



Public Participation Process Report

A Guide to Developing Your Public Participation Report

for New Jersey's Combined Sewer Overflow Permits and Long Term Control Plans

Introduction

Public participation is an integral part of the Long Term Control Plan (LTCP) development and implementation process. The NJPDES CSO permit (hereafter "the permit") has requirements for public participation activities and the submission of the Public Participation Process Report and the formation of a Supplemental CSO Team. Since LTCPs are more complex and extensive than previous permit requirements, it is important to seek more public input and identify CSO control alternatives that are supported by the public given that alternatives will likely involve significant costs.

This resource is intended to assist permittees in the development of their Public Participation Process Report (Report) consistent with Part IV.G.2 of the permit. The Report is due on July 1, 2018. **Permittees are encouraged to submit early drafts of their Report for preliminary review by the Department.**

This resource has two sections: Public Participation Process Report and Implementation and Supplemental CSO Team. Both sections include a checklist of items to include in the Report that align with permit requirements for public participation and the Supplemental CSO Team. These questions are for self-evaluation, are illustrative, and serve to provide a suggested list of information and activities that can be a part of the Report and public participation process.

There are two additional resources that can be utilized as you are developing and implementing your Public Participation Process Report:

DEP's CSO Public Participation Presentation

<http://www.nj.gov/dep/dwq/pdf/cso-public-partic-ltcp-permittee-trng-10-19-15-v2.pdf>

DEP's Resource on Forming and Utilizing Your Supplemental CSO Team

<http://www.nj.gov/dep/dwq/pdf/supplemental-team-resource-doc-5.9.16.pdf>

The permit requires a public participation process that engages the affected public, including hydraulically connected communities, throughout the three phases of the LTCP and through the use of various outreach methods. The permit also requires the establishment of a Supplemental CSO Team. The establishment of a Supplemental CSO Team alone will not satisfy the entirety of the public participation permit requirements. Permittees are to be conducting public participation activities that extend beyond the Supplemental CSO Team. It is important to note that the public and the Supplemental CSO Team may be interested in reviewing your Public Participation Process Report for opportunities to engage in the public participation process and to provide feedback on the public participation approach and methods identified in the Report.



Permit Excerpt: Part IV.G.2

2. Public Participation Process

a. The permittee shall submit the Public Participation Process Report to include appropriate input and participation with other hydraulically connected communities, in accordance with D.3.a and G.10.....

b. Implementation shall actively involve the affected public throughout each of the 3 Steps of the LTCP process. The affected public includes rate payers (including rate payers in the separate sewer sections), industrial users of the sewer system, persons who reside downstream from the CSOs, persons who use and enjoy the downstream waters, and any other interested persons. A Public Participation Process Report shall include the following elements:

i. Conduct outreach to inform the affected/interested public (during the development of the permittee's LTCP) through various methods which may include: public meetings, direct mailers, billing inserts, newsletters, press releases to the media, postings of information on the permittee's website, hotline, development of advisory committees, etc.; and to.

ii. Invite members of the affected/interested public to join a Supplemental CSO Team to work with the permittee's assigned staff, consultants and/or contractors as required in Part IV, Section G.2.c. of the permit.

c. The permittee shall invite members of the affected/interested public to establish a Supplemental CSO Team to work with the permittee's assigned staff from Section F.1 and to work as an informal work group as a liaison between the general public and the decision makers for the permittee. The goals of the Supplemental CSO Team could consist of the following elements:

i. Meet periodically to assist in the sharing of information, and to provide input to the planning process;

ii. Review the proposed nature and extent of data and information to be collected during LTCP development;

iii. Provide input for consideration in the evaluation of CSO control alternatives; and

iv. Provide input for consideration in the selection of those CSO controls that will cost effectively meet the Clean Water Act requirements.



Keys to Public Participation Success

- Engage the public early and often. Use a variety of methods to share and engage with diverse populations.
- Visually explain and depict the issues. Provide graphics and pictures to explain and demonstrate the issues, alternatives, and goals of the LTCP.
- Use [effective communication skills](#); translate complex issues into an understandable format; and provide information that is relatable to the target audience.
- Include and encourage participation of your local planning, zoning, environmental, redevelopment and governing body boards and commissions. Engaging these decision makers will help to identify preferred alternatives, possibly increase public participation and awareness, and identify opportunities to incorporate abatement of CSOs into current, planned, or future projects.
- Leverage any relevant public engagement opportunities to get the word out about CSOs and how people can provide feedback (such as community groups' standing meetings, tables at a community fair, or other planned community events).
- Set public participation goals and measurable outcomes.
- Evaluate the effectiveness of your public participation process and adjust as needed to better achieve participation goals.
- Make information available to the public on an easily accessible platform (website or other sharing platform) that is regularly updated and provides an opportunity for feedback.
- Provide information in formats and languages appropriate to your community demographics.



Public Participation Process & Implementation

The Public Participation Process Report is due on July 1, 2018. The Report should cover information on how the public has been and will continue to be engaged, including descriptions of the various forms of messaging, outreach methods, information sharing, and information gathering methods. Goals and objectives should be established to guide the development of the public participation process and plan implementation. The Report should also include information on how and when hydraulically connected communities are incorporated into the public participation process.

The Report should define and provide information on who the permittee(s) identified as the affected public and how they have been and will continue to be engaged throughout the LTCP development process. The Report should also provide information on the permittees' approaches to solicit information from and provide information to the interested public. There could be a variety of meeting types, times, and avenues to reach a variety of stakeholders beyond the Supplemental CSO Team.

Does the Report include clear discussion of the following:	Y/N
Goals and desired outcomes for actively involving the affected public.	
A description of outreach to hydraulically connected municipalities served by the same sewer treatment plant, including municipalities with separate sewer systems.	
Identification of the affected public.	
Information on the variety of outreach and engagement activities already completed: <ul style="list-style-type: none"> • description of outreach methods used, • why each outreach method was selected, and • outcome of the engagement activity (such as completed surveys, number of those in attendance, or summary of feedback from attendees). 	
Information on planned outreach and engagement activities: <ul style="list-style-type: none"> • description of outreach methods to be used, • why each outreach method was selected, and • description of desired outcomes. 	
How the public engagement activities provide opportunities for the public to be engaged throughout all three stages of the LTCP development process. <ul style="list-style-type: none"> • System Characterization • Development and Evaluation of Alternatives, and • Selection of Alternatives and Implementation of the LTCP 	
How the feedback from the public will be considered in the decision-making process.	
Information on how the public and hydraulically connected communities will be provided with periodic updates on LTCP implementation.	
How the public is provided an opportunity to review key draft submittals, such as the Characterization Report, the Public Participation Process Plan, the Consideration of Sensitive Areas, and the Development and Evaluation of Alternatives, and the Selection of Alternatives.	



Examples of Various Engagement Methods

Examples of various types of engagement activities include:

Does the Public Participation Plan include the following engagement methods*?	Y/N
• Social Media Posts	
• Emails	
• Maintained & Routinely Updated Website	
• News Articles	
• Mailers/Inserts	
• Posters	
• Attending and Presenting at Existing Community Group Meetings	
• Hosting a booth at community/neighborhood fairs/events	
• Holding an Open House	
• Public Meetings	
• Distributing Surveys	
• Conducting Interviews	
• Offering CSO Infrastructure Tours	
• Other	

*Methods can include any of the activities listed as well as others that are not listed. Doing all activities is not required to meet the permit requirements.

Resources/Supplemental Information

EPA Public Participation Guidance:

<https://www.epa.gov/international-cooperation/public-participation-guide>

Unearthing Infrastructure: Communicating Water Infrastructure to New Jersey’s Communities and Stakeholders:

http://www.jerseywaterworks.org/wp-content/uploads/2017/02/unearthing_infrastructure_Feb.2017.pdf

Three Steps of the LTCP Development Process:

Step One:

- System Characterization Work Plan: Due January 1, 2016
- System Characterization Report: Due July 1, 2018
- Public Participation Process Report: Due July 1, 2018
- Consideration of Sensitive Areas Information: Due July 1, 2018

Step Two:

- Development and Evaluation of Alternatives Report: Due July 1, 2019

Step Three:

- Selection and Implementation of Alternatives Report: Due June 1, 2020



Supplemental CSO Team

In addition to the above, the Report should describe the operation of the Supplemental CSO Team. Multiple communication tools should be considered. Meeting periodically with the Supplemental CSO Team could and should include multiple meeting types, locations and targeted audiences. Periodic meetings with the Supplemental CSO Team or the public are an opportunity to take very technical information and make it accessible and understandable.

The Supplemental CSO Team should be consulted for input regarding the evaluation and selection of CSO alternatives. How and when this feedback will be solicited should be described in the Public Participation Process Report as well as how the information will be compiled, reviewed and used by the permittee.

Does the Report include clear discussion of the following:	Y/N
Has the Supplemental CSO Team been established?	
<ul style="list-style-type: none"> Who was invited to participate on the team? 	
<ul style="list-style-type: none"> Who has joined the Supplemental CSO Team? 	
<ul style="list-style-type: none"> Is the membership representative of the area and its needs? 	
<ul style="list-style-type: none"> When was the Supplemental CSO Team formed and first convened? 	
<ul style="list-style-type: none"> Does the Supplemental CSO Team have goals or statements of purpose? 	
Identification of the periodic meetings/events for the Supplemental CSO Team.	
Description of how information is shared with the Supplemental CSO Team.	
<ul style="list-style-type: none"> Does the Report provide a plan for sharing information and data collected throughout the development of the LTCP? 	
<ul style="list-style-type: none"> Does the Report provide when and how the Supplemental CSO Team will be informed of alternatives and provide input to be considered for the evaluation and selection of alternatives? 	
<ul style="list-style-type: none"> Does the Report provide the means by which the public and/or the Supplemental CSO Team will be informed of the ongoing implementation of the LTCP? 	
<ul style="list-style-type: none"> Does the report explain how the Supplemental CSO Team is provided an opportunity to review key draft submittals, such as the Characterization Report, the Public Participation Process Plan, the Consideration of Sensitive Areas, and the Development and Evaluation of Alternatives, and the Selection of Alternatives? 	
Does the Report cover when and how input will be collected from the Supplemental CSO Team and considered in the decision-making process?	



Below are several best practices that the permittee should consider adopting for the Supplemental CSO Team:

Does the Report include a discussion of these best practices:	Y/N
Is the Supplemental CSO Team meeting schedule, agendas, and meeting material posted on your website or other platform for sharing information?	
Are meeting agendas provided to the Supplemental CSO Team in advance of the meeting? (For example, at least one week in advance of meeting.)	
Are meeting agendas and meeting minutes posted on your website?	
How the meeting materials shared with the Supplemental CSO Team participants after meetings?	
The Supplemental CSO Team's goals or statements of purpose.	