GWQS DEP PUBLIC COMMENTS

April 4, 2024

To: New Jersey Department of Environmental Protection (NJDEP)

From: Climate Action Revolution Network (CRAN)

RE: Ground Water Quality Standards Rule Amendments

Climate Action Revolution Network (CRAN) is writing to contribute comments on the proposed amendments to the ground water quality standards rule in the state of New Jersey. CRAN's goal is to engage youth in environmental action to address issues which affect local New Jersey communities.

Groundwater of the highest quality is vital to the health of surface water, as it and the reservoirs it fills, will be inadvertently affected through their natural connection. Knowing that New Jersey residents rely on both public water and well water, this means that a change in the GWQS could affect the quality of drinking water of nearly all the New Jersey population that has the right to the consumption of clean water. CRAN advocates for the most stringent standards of water quality in New Jersey in order to most protect the health of the communities and ecosystems that rely on it as a resource.

The following statement from page 5 of the proposal causes some concern: "of these 65 proposed ground water quality standards…13 will become less stringent". Rigorous, health-based water quality standards are necessary to ensure the population of New Jersey is ingesting water that is considered safe to consume over both short and long periods of time. Lessening the stringency of 13 constituent standards poses serious considerations to impacts on human health as a result. The state of New Jersey has shown signs of leadership in regards to strong water quality standards in the instances of arsenic and PFAS, and the state should continue to pursue examples of these robust standards. And in knowing there are multiple instances when a PQL is higher than the drinking water quality criterion, developments should be made to continue improving the analytical methods used to reliably measure lower concentrations of a constituent.

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