



*Ocean Advocacy  
Since 1984*

March 30, 2006

Gautam R. Patel, Chief  
Bureau of Financing and Construction Permits  
PO Box 425  
Trenton, NJ 08625

RE: Middlesex County Utilities Authority - Draft Surface Water Major Modification Permit  
Action, NJPDES Permit # NJ0020141

SENT VIA FACSIMILLE

Dear Mr. Patel:

Clean Ocean Action (COA) reviewed the permit modification above and submits the following comments. COA is a regional, broad-based coalition of conservation, environmental, fishing, boating, diving, student, surfing, women's, business, service, and community groups with a mission to improve the degraded water quality of the marine waters of the New Jersey/New York coast. The draft major modification to the Middlesex County Utilities Authority (MCUA) NJPDES Permit requires the Permittee to determine the feasibility and cost of receiving, treating and discharging additional sewage flows as and means of reducing CSO discharges.

COA commends New Jersey Department of Environmental Protection (NJ DEP) for requiring the Permittee to engage in a comprehensive public participation process that will involve the public in the decision-making process of developing, evaluating and selecting the long-term CSO controls. The information and items described in Appendix CSS-DTW A clearly define actions required of the Permittee to adequately include the public through out the process. Clean Ocean Action strongly believes that public review and comment is an integral part of intelligent, fact-based development and we looks forward to participating in MCUA's public outreach campaign.

It is not clear what the next step will be once the Permittee has evaluated the different alternatives for utilizing the treatment works for Combined Sewer Overflow (CSO) control. Maximizing water quality improvements must take priority over economic considerations. For example, it may be more costly to increase the primary **and** secondary capacity treatment works to be able to handle the increased volume from the CSO, but it will provide significant environmental benefits to the Raritan Bay.

Sincerely,

Cindy Zipf  
Executive Director

Jennifer Samson, Ph.D  
Principal Scientist