



Alliance for a Living Ocean

April 29, 2003

Mr. Jack Kaskey
N.J. Dept. of Environmental Protection
P.O. Box 402
Trenton, NJ 08625-0402

Dear Mr. Kaskey:

I am writing this letter on behalf of the Alliance for a Living Ocean (ALO), a non-profit grassroots environmental group on Long Beach Island, New Jersey, in response to the NJDEP press release of April 9, 2003 regarding a Public Hearing on Wastewater Recycling. ALO is dedicated to promoting clean waters and a healthy aquatic environment. We are delighted to learn that DEP Commissioner Campbell is committed to investigating wastewater recycling.

This very idea is one that we recently supported in a letter to our Ocean County Utilities Authority (OCUA) and Ocean County Board of Chosen Freeholders. The wastewater received at OCUA facilities is currently being discharged exclusively into the Atlantic Ocean. Per summary sheets of discharges from all three of the OCUA's facilities for the 2002 calendar year, the average daily flow of wastewater is: 21.00, 22.13 and 6.91 MGD. In layman's terms, this translates to 18 billion gallons of water in Ocean County alone that is being transferred to the ocean on a yearly basis.

The ocean would seem to be one of the last places that needs more water, particularly in light of severe drought situations our state has been facing in recent years. Certainly such a great volume of water would be much more **beneficial** were it re-routed elsewhere. Our organization has also begun to question the **detrimental** effects of freshwater intrusion on the marine habitats in the area of these outflow pipes. We fear that changes in salinity levels may be affecting the flora and fauna on the ocean floor and in turn causing fish to move elsewhere.

Our investigation into this topic began February 2002, when commercial fishermen in our area raised concerns about the quality of water at the outflow pipes into the Atlantic Ocean. After ALO's extensive research into this subject, short of performing our own testing, we have concluded that the OCUA treatment plants meet the National Pollution Discharge Elimination System (NPDES) limits and, in fact, produce a discharge "cleaner" than required by permit. We could not necessarily attribute the decline in fish to hazardous discharge. We did, however, raise the question whether these limits are perhaps stringent enough, knowing that the permit limitations for discharge into the ocean is less than that required for streams and rivers. Seemingly anecdotal data that the fish are no longer existent in the area of the outflow pipes is deeply concerning. Additional studies are needed to understand what is contributing to this phenomenon: (1) increased fresh water volume in the area, (2) discharge parameters which are not acceptable to ocean species as once thought, (3) some other factor(s).

ALO hopes that a current feasibility study in Ocean County will be intensified to investigate the practicality of diverting a percentage, if not all, of the wastewater away from the ocean. Reintroducing such a large quantity of water would hopefully rejuvenate our stressed aquifers. The benefits would be two-fold: (1) address the increased demand for groundwater created by unprecedented development in Ocean County with thousands of new homes and businesses, and (2) address our concerns for stress to the delicate marine ecosystems (plant and wildlife) that are also fighting for water in our surrounding lakes, streams, watersheds, and bays.

ALO strongly supports all efforts which will re-route **clean** wastewater away from the ocean, such as irrigation and industrial purposes. We especially support recharging our Pinelands – a unique ecosystem in the world, which is being severely threatened as nature and development compete for finite water resources.

Sincerely,

Larrell R. Brown

Larrell R. Brown
President – ALO
Board of Trustees

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-cc: Commissioner Bradley M. Campbell \