

Participating Organizations

Alliance for a Living Ocean

American Littoral Society

Arthur Kill Coalition

Asbury Park Fishing Club

Bayberry Garden Club

Bayside Saltwater Flyrodders

Belford Seafood Co-op

Belmar Fishing Club

Beneath The Sea

Bergen Save the Watershed Action Network

Berkeley Shores Homeowners Civic Association

Cape May Environmental Commission

Central Jersey Anglers

Citizens Conservation Council of Ocean County

Clean Air Campaign

Coalition Against Toxics

Coalition for Peace & Justice

Coastal Jersey Parrot Head Club

Coast Alliance

Communication Workers of America, Local 1034

Concerned Businesses of COA

Concerned Citizens of Bensonhurst

Concerned Citizens of COA

Concerned Citizens of Montauk

Dosil's Sea Roamers

Eastern Monmouth Chamber of Commerce

Environmental Response Network

Explorers Dive Club

Fisheries Defense Fund

Fishermen's Dock Cooperative

Fisher's Island Conservancy

Friends of Island Beach State Park

Friends of Liberty State Park

Friends of Long Island Sound

Friends of the Boardwalk

Garden Club of Englewood

Garden Club of Fair Haven

Garden Club of Long Beach Island

Garden Club of Morristown

Garden Club of Navesink

Garden Club of New Jersey

Garden Club of New Vernon

Garden Club of Oceanport

Garden Club of Princeton

Garden Club of Ridgewood

Garden Club of Rumson

Garden Club of Short Hills

Garden Club of Shrewsbury

Garden Club of Spring Lake

Garden Club of Washington Valley

Great Egg Harbor Watershed Association

Highlands Business Partnership

Highlands Chamber of Commerce

Hudson River Fishermen's Association/NJ

Interact Clubs of Rotary International

Jersey Coast Shark Anglers

Jersey Shore Audubon Society

Jersey Shore Captains Association

Jersey Shore Running Club

Junior League of Monmouth County

Junior League of Summit

Kiwanis Club of Manasquan

Kiwanis Club of Shadow Lake Village

Leonardo Boat & Pleasure Boat Association

Leonardo Tax Payers Association

Main Street Wildwood

Marine Trades Association of NJ

Monmouth Conservation Foundation

Monmouth County Association of Realtors

Monmouth County Audubon Society

Monmouth County Friends of Clearwater

Montauk Fisherman's Emergency Fund

National Coalition for Marine Conservation

Natural Resources Protective Association

Navesink River Municipalities Committee

Newcomers Club of Monmouth County

NJ Beach Buggy Association

NJ Commercial Fishermen's Association

NJ Council of Dive Clubs

NJ Environmental Federation

NJ Environmental Lobby

NJ Marine Educators Association

NJ PIRG Citizen Lobby

NJ Sierra Club

NJ Windsurfing Association

Nottingham Hunting & Fishing Club

NYC Sea Gypsies

NY/NJ Baykeeper

NY Marine Educators Association

Ocean Advocates

Ocean Conservancy

Ocean County Citizens for Clean Water

Ocean Divas

Ocean Wreck Divers

Outreach/First Presbyterian Church of Rumson

Piscataway Saltwater Sportsmen Club

Raritan Riverkeeper

Riverside Drive Association

Rotary Club of Long Branch

Saint George's by the River Church, Rumson

Saltwater Anglers of Bergen County

Sandy Hook Bay Catamaran Club

Save Barnegat Bay

Save the Bay

SEAS Monmouth

Seaweeders Garden Club

Shark River Cleanup Coalition

Shark River Surf Anglers

Sheepshead Bay Fishing Fleet Association

Shore Adventure Club

Shore Surf Club

Sierra Club, Shore Chapter

Soroptimist Club of Cape May County

South Monmouth Board of Realtors

Staten Island Friends of Clearwater

Strathmere Fishing & Environmental Club

Surfers' Environmental Alliance

Surfrider Foundation, Jersey Shore Chapter

TACK 1

Terra Nova Garden Club

Unitarian Universalist Congregation of Mon. County

United Boatmen of NY/NJ

United Bowhunters of NJ

Volunteer Friends of Boaters

Waterspint

Women's Club of Brick Township

Women's Club of Keyport

Women's Club of Long Branch

Women's Club of Merchantville

Zen Society

Clean Ocean Action

www.CleanOceanAction.org



Ocean Advocacy
Since 1984

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October 15, 2008

New York State Department of State
Division of Coastal Resources
Attn: Consistency Review
41 State Street
Albany, NY 12231-001

VIA E-MAIL AND REGULAR MAIL

RE: PN # 09 JAMAICA Bay Federal Navigation Project

To Whom It May Concern:

These comments are on behalf of Clean Ocean Action, a regional, broad-based coalition of over 125 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.

COA is concerned about the placement location of this dredged material at HARS, as there has been over-placement in certain Priority Remediation Areas (PRA) and lack of any coverage in others. Based on monitoring data, placement of remediation material has clearly been mismanaged. In PRAs 1 and 2, 1998-2007 depth difference maps of capping material show "several deposits measured nearly 19 ft (5.8 m) thick."¹ Some of these mounds almost exceed the management depth of 35 feet deep. And yet, remediation material has continued to be placed in PRAs 1 and 2 in these same elevated regions, in an effort to fill in some of the valleys between these mounds. However, as Joel Peichioli from NJDEP mentioned at a recent Scientific Review Panel Meeting (which has not convened in years), at some point the rate of return is so diminished for this management strategy that it needs to be abandoned and other regions need to be capped, even if there are some small valleys that do not have 1 m of cap.

Given the projected shortage of remediation materials in the near future and the near completion of PRA 1 and 2, COA recommends that the material be placed in PRA 3 and 4 (and then possibly PRA 5) over regions where remediation material has not yet been placed. Guidance disposal points should be positioned to cover the maximum area

¹ SAIC 2007. Results of the 2007 Multibeam Bathymetric and Backscatter Surveys at the Historic Area Remediation Site. Prepared for the USACE New York District, December 2007.


that has not yet received capping dredged material while avoiding Historic Shipwreck Buffer Zones.

A written response to these comments is requested.

Sincerely,



Cindy Zipf
Executive Director



Jennifer Samson, Ph.D.
Principal Scientist



Heather Saffert, Ph.D.
Staff Scientist

cc: Richard Tomer, Chief Regulatory Branch, US Army Corps of Engineers
New York District, and Doug Pabst, Team Leader, Dredged Material Management Team,
US Environmental Protection Agency