NEW JERSEY MARINE FISHERIES COUNCIL

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June 27, 2025

Mr. Jason Shea

Project Manager

US Army Corps of Engineers

26 Federal Plaza - # 17-413-5

New York, NY 10278

Dear Mr. Shea:

The NJ Marine Fisheries Council (Council) appreciates the opportunity to provide comments on the US Army Corps of Engineers (ACOE) proposal to identify new offshore borrow sites for the Sea Bright to Manasquan Coastal Storm Risk Management project. The Council advises the DEP Commissioner on issues related to management of New Jersey’s valuable marine resources, as well as the commercial and recreational fisheries which these resources support.

New Jersey’s commercial and recreational marine fisheries support over 72,000 jobs and contribute approximately $2 billion annually to the state economy. Council recognizes ACOE’s mandate to maintain coastal beaches for storm protection and recreational purposes, but the proposed project raises significant concern over impacts to our valuable marine resources and fisheries. These include impacts to valuable fish habitat and species composition, impacts to fishing operations during and following sand extraction, and site mitigation and other environmental review requirements, among others. Collectively, these impacts result in loss of important fish habitat which in turn affects fishing access and could lead to social and economic impacts to New Jersey’s valuable marine fisheries.

Sand borrow areas are sited in nearshore areas where there is sufficient quantity and quality of sand for use as beach fill. These areas often contain features that are important as fish habitat, such as lumps and ridges, and may contribute to broader ecological processes, such as upwelling. As such, these areas can be important sites for both commercial and recreational fishing activity. Extraction of sand such that the physical structure and topography are significantly altered at a minimum reduces the amount of habitat available, and more drastically, may diminish the characteristics that fish seek as habitat or influence other ecological functions. At the extreme, full depletion of a borrow site not only removes the physical structure but alters the sediment composition. This not only erodes its use as habitat but may also make the site unfishable for certain gears.

Selection of suitable sites should include evaluation of baseline data that includes species composition and current uses (eg fishing activity). Areas frequented by anglers or other ocean users, or by species that are important to commercial or recreational fisheries, or their forage, should be given lower priority. Further, ACOE should prioritize the removal of sand from previous replenishment projects that has accumulated in and around inlets, channels, and other navigable waterways. Shoaling of these areas due to sand accumulation reduces access for commercial and recreational vessels and may lead to navigational hazards. The quantity of material may not be sufficient for a complete project, but maintenance of access and mitigation of hazards should be a priority over removal of natural habitat.

Timing, duration, and intensity of sand mining operations should be planned accordingly to minimize impacts to marine species and activities. Sand mining can result in “takes” of endangered species, such as marine mammals, sea turtles, and Atlantic sturgeon, present in the project area. Mining activities may also result in both direct impacts (ie capture) and indirect impacts (eg sound, turbidity) to other important species. These impacts could lead to reduced stock productivity from habitat loss, increased mortality, and spawning disruptions, and reduced availability as fish disperse from the area of impact, which may have cascading effects on commercial and recreational quotas due to real or perceived reductions in population size. Further, access to fishing grounds may be impeded by mining operations. These effects are magnified when multiple mining projects operate concurrently. Minimization of impacts to NJ’s marine resources and valuable fisheries should be given greater consideration when managing operations. ACOE must schedule projects to avoid presence of protected species and critical life history phases (eg migration, spawning). Projects should be coordinated to limit the number of projects and/or dredges that are authorized to work at the same time within a region.

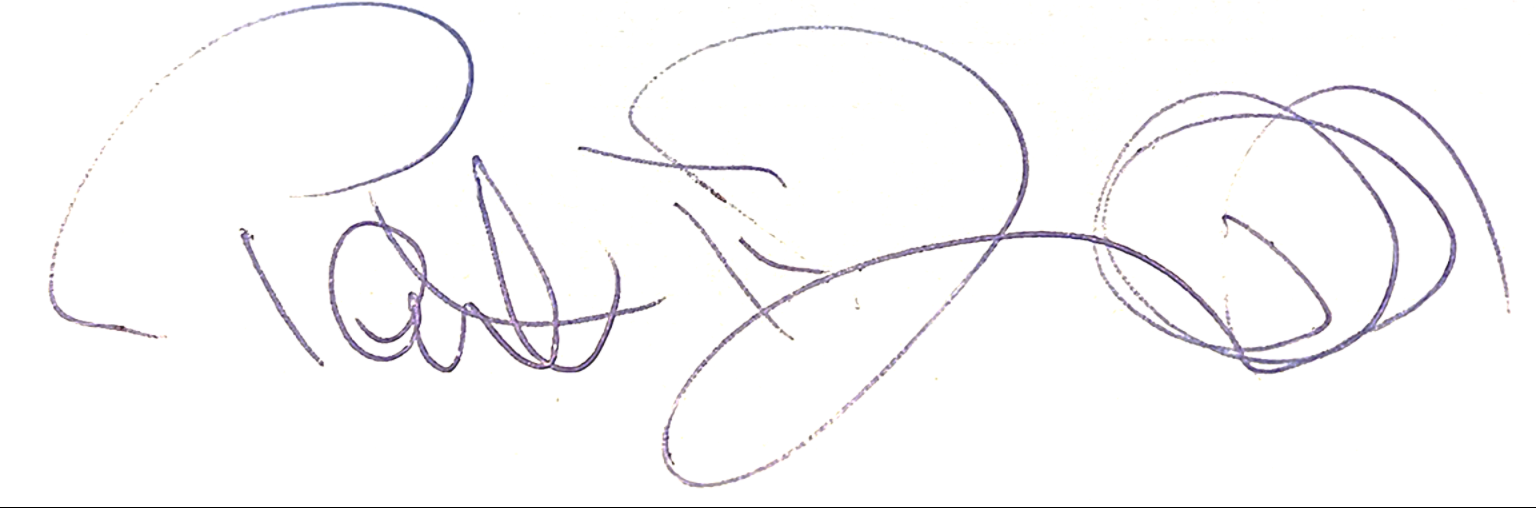
Council expressed considerable concern about cumulative impacts, not only of multiple sand mining operations, but from all ocean development, such as offshore wind, cable crossings, and others. Many of these projects either restrict access to traditional fishing grounds or alter the environment to make them unfishable. Over the years, these projects have collectively resulted in a significant loss of access and a suite of associated social and economic impacts. It is recommended that ACOE research and evaluate methodologies to promote the use of less heavily utilized areas for source material.

Council recommends that the project plan include mitigation strategies following sand extraction for both the depleted site and the newly selected site. Although the project is required to follow the NEPA process, the original project was approved nearly 40 years ago when environmental protection rules were less rigorous. Evidence shows that borrow sites do not recover naturally, resulting in permanent removal of habitat suitability and other ecological processes the original site provided. Mitigation strategies should be implemented to facilitate restoration of the site to previous functionality.

Council expressed concern over the review process and whether there would be additional time for review of the project before approval. In particular, the project timeline indicates that the draft Environmental Assessment will be completed in fall of 2026, but there was uncertainty whether the draft EA would be available for public comment. Council recommends that the draft EA be made publicly available for a minimum of 30 days, including at least one public hearing, and that comments received during that period should be incorporated into the project plan.

I would like to thank you again for your participation at our May 2025 Council meeting and the opportunity to provide comments on the proposed project. Your presentation and the ensuing discussion were very informative and crucial to the development of these comments. Consideration of these concerns in the selection of a final project area will achieve ACOE shore protection goals while minimizing impacts to New Jersey’s valuable marine resources.

Sincerely,



Patrick F. Donnelly, DMD

Acting Chairman

Cc: Stephen Rochette, Philadelphia District