

Participating Organizations

Alliance for a Living Ocean
American Littoral Society
Arthur Kill Coalition
Asbury Park Fishing Club
Bayberry Garden Club
Bayshore 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 Bensonthurst
Concerned Citizens of COA
Concerned Citizens of Montauk
Dossil'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 Lake
Garden Club of Spring Lake
Garden Club of Washington Valley
Great Egg Harbor Watershed Association
Greater Point Pleasant Charter Boat Association
H-Mar Striper Club
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 Party & 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 Bay Anglers Club
Raritan Riverkeeper
Riverside Drive Association
Rotary Club of Long Beach
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 I
Terra Nova Garden Club
Unitarian Universalist Congregation of Mon. County
United Boatmen of NY/NJ
United Bowhunters of NJ
Volunteer Friends of Boaters
Waterspirit
Women's Club of Brick Township
Women's Club of Keyport
Women's Club of Long Branch
Women's Club of Merchantville
Zen Society



Ocean Advocacy
Since 1984

Clean Ocean Action

www.CleanOceanAction.org

☐ **Main Office**
18 Hartshorne Drive
P.O. Box 505, Sandy Hook
Highlands, NJ 07732-0505
Voice: 732-872-0111
Fax: 732-872-8041
SandyHook@CleanOceanAction.org

☐ **Institute of Coastal Education**
3419 Pacific Avenue
P.O. Box 1098
Wildwood, NJ 08260-7098
Voice: 609-729-9262
Fax: 609-729-1091
Wildwood@CleanOceanAction.org

Bill Figley, Reef Coordinator
NJ Division of Fish and Wildlife
P.O. Box 418
Port Republic, NJ 08241

December 6, 2004

RE: New Jersey Draft Artificial Reef Plan

VIA FASCIMILE

Dear Mr. Figley,

Clean Ocean Action (COA, representing 170 organizations) has reviewed the above referenced draft plan submit the following comments.

In general, the Draft Plan works towards ensuring that only appropriate materials be used to develop New Jersey's Artificial Reef Program. However, it is clear that the program is under-funded and lacks supportive resources to be effective. It is important to note that because of content, the document reads much more like a program than a plan. Perhaps the NJDEP should consider revising the title.

Upon careful review of the document to address marine water quality issues there are a few specific issues that we feel still need additional attention. They are as follows:

1. TRAC Committee

It is our understanding that the TRAC Committee has only had one meeting thus far and has yet to begin the process of developing, much less implementing, monitoring requirements for the 8-year study on subway cars. The TRAC Committee is an integral part of the reef program and serves the important role of providing balanced and independent scientific and technical advisory regarding future (and current) reef materials. The DEP is urged to activate the committee and allow it to provide the technical and scientific expertise needed for the reef program

2. CONCRETE/REEF BALLS ISSUES

This section requires clarification in several areas. Page 66, Section 6.2 Construction Material, 2nd states:¶ “*Type II Portland cement, which is used to manufacture **Reef Ball habitats**, can be expected to have a life expectancy of 20 to 35 years in the marine environment (American Society of Testing Materials in the Designation Standard Specifications for Portland Cement).*”

This statement is misleading for two reasons and should be revised:

- a. Type II Portland Cement ASTM Standards refer to an engineering lifespan and are only appropriate for land-based applications. The biological lifespan (maintaining 90% integrity) of unamended Type II Portland Cement in the marine environment is approximately **100 years**¹.
- b. Reef Balls are not an appropriate example and should be excluded from this paragraph as they are made with a Microsilica additive, which resists chemical breakdown in marine environments, which increases the lifespan of the Reef Ball to **500 years**¹.

¹ Information provided by W.R. Grace Concrete and the Reef Ball Foundation

3. MISCELANEOUS CABLE

a. Section 6.2.6 Undersea Telecommunication Wire, Page 69

There are several concerns about the appropriateness of using obsolete telecommunication wires as reef materials (100’ diameter piles of cable 3’ to 10’ in profile)

The Plan clearly states that:

- Environmentally hazardous material should not be used:

Page 6, Section 7 (C)

“5. *The reef materials shall not be toxic*”

“6. *The reef materials shall not be hazardous*”

- Plastic materials should not be used:

- Page 69, Section 6.2.7, 2nd Sentence: “*Lightweight materials, such as plastic or fiberglass, are unacceptable as major components of reef structures*”
- Page 81, 5th ¶, 1st Sentence: “*The use of manmade materials, such as auto tires (not used anymore), plastic (not used), concrete debris and ships, to construct reefs opens the potential for introducing chemical compounds into the marine environment.*”

b. There is no scientific evidence to support the statement in this section

“*After laying on the ocean floor for 50 to 100 years, they show little sign of wear*”

A study analyzing failures of ocean communications cable cited commercial fishing operations as the most significant hazard to the cables resulting in damage². On their own these cables may be fairly resistant to deterioration, but many of the older ones have already sustained significant damage while in place. These cables can contain contaminants such as copper wire cores, coal-tarred hemp or polyethylene plastic coverings and lead based stabilizers.

² A. J. Munitz. 1966 Analyzing Failures of Ocean Communications Cable. Undersea Technology 7: 45-49.

Cables clearly do not meet the specific conditions stated in Section 1.2 Department Policy and are therefore not appropriate artificial reef material.

4. MONOFILLAMENT

It is evident that the structural composition of some of the reef material leads to excessive snagging of fishing tackle and creates an entanglement hazard to marine life. COA recommends future discussions with divers and fishing groups, to develop guidelines to reduce and/or prevent tackle entanglement on reef materials.

5. CLEAN UP PROCEDURES

The Plan lacks guidelines for clean-up procedures that are required prior to sinking of materials. All material types need specific clean-up procedures to ensure they are in appropriate condition for reef building.

6. LANGUAGE ISSUES

Page 69, 1st Sentence: There is a reference to standards in Paragraph 4. This needs to be clarified and should state:

*“standards set forth in paragraph 4 **of the Policy Directive 2003-02**”*

Page 71, Section 6.2.8 Other Suitable Material: The language needs to be clarified to properly reflect the Policy Directive 2003-02, we recommend a change from:

“with the exception of subway cars” to

*“with the exception **of the proposed study** on subway cars”*

7. FUNDING ISSUES

The success of the artificial reef program in New Jersey is going to require a much more substantial commitment of funding and resources to support the purchase of high quality reef materials and adequate scientific monitoring.

The incorporation of our comments into the final NJ Artificial Reef Plan would ensure proper protection of the marine environment and result in a document that will serve as the foundation for the Artificial Reef Program.

Sincerely,



Cindy Zipf
Executive Director



Jennifer Samson, PhD
Principal Scientist