

## 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 Bensonhurst  
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  
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  
Kiwans Club of Manasquan  
Kiwans 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  
NYG 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  
Piscatiny 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-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

# Clean Ocean Action



Ocean Advocacy  
Since 1984

## ■ Main Office

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October 15, 2008

Richard Tomer  
Acting Chief, Regulatory Branch  
US Army Corps of Engineers  
New York District  
26 Federal Plaza  
New York, NY 10278-0090

VIA EMAIL AND REGULAR MAIL

RE: Public Notice #: NAN-2008-01018-EJE, BP Products North America, Inc., Carteret, NJ  
10-year Maintenance Dredging

Dear Mr. Tomer,

These comments are submitted on behalf of Clean Ocean Action (COA, a regional, broad-based coalition of 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. The Public Notice describes the maintenance dredging of the Carteret Terminal that would remove 26,220 cubic yards of material.

We object to the allowance of dredging with "barge overflow" and that decanted water may be returned to the waterway without any conditions, such as a 24-hour settling period. Because of pollution impacts of these activities, the State of New Jersey's Department of Environmental Protection (NJDEP) does not allow barge overflow for contaminated sediments and has specific decanting procedure requirements unless the dredged material has been tested and shown to meet Category I standards. The Corps must also require the applicant to comply with NJDEP requirements for environmental dredging techniques, which include using a closed clamshell bucket, maximizing each bucket volume of extracted sediments, maintaining a slow hoist speed, as well as not hosing and rinsing sediments off the sides and gunwales of the barge.

Due to the likely release of contaminants to the water column from the dredging practices described, this permit should not be approved until the processing procedures are corrected to prohibit barge overflow and coordinate with environmentally protective requirements specified by NJDEP. Further, should the application be amended and approved requiring these conditions, we request that the Corps provide details on how such permit conditions will be monitored and upheld.

A written response to these comments is requested.

Sincerely,

Cindy Zipf  
Executive Director

Heather Saffert, Ph.D.  
Staff Scientist