UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930

January 15, 2026

Todd Schaible, Chief
Regulatory Branch
U.S. Army Corps of Engineers
Philadelphia District
1650 Arch Street
Philadelphia, PA 19103

RE: Aurora Submarine Fiber Optic Cable
NAP-2024-00555; NWP 57

Dear Mr. Schaible:

We have reviewed the Essential Fish Habitat (EFH) Assessment dated May 30, 2025, and the associated June 10, 2025, document entitled *New Jersey Department of Environmental Protection & US Army Corps of Engineers Permitting for Aurora Submarine Fiber Optic Cable Installation for the Manasquan, New Jersey Landing*. Alcatel Submarine Networks proposes to install and maintain approximately 3,925 nautical miles (nm) of 1.5 inch submarine fiber optic communications cable between the town of Manasquan in Ocean County, New Jersey and Blaaberg, Denmark. The applicant's preferred route will use existing upland subsurface infrastructure at the Manasquan connection point and then enter New Jersey state waters and cross the entire 200 nm US Exclusive Economic Zone (EEZ) before continuing through international waters to landfall in Denmark. The applicant proposes to bury the cable from the landfall point in New Jersey out to a depth of 3,281 feet (ft), or the distance of approximately 97 nautical miles (180 km), after which the cable will be laid on the seafloor surface.

Pre-lay route clearance activities will consist of a grapnel run to remove debris and a screeding tool to level the seabed. The proposed cable installation methods include the use of Remotely Operated Vehicles (ROVs) or divers with jetting tools, horizontal directional drilling (HDD), and cable plow. ROVs, divers, and HDD are proposed in the nearshore environment while the cable plow is anticipated to begin working at the 49 ft depth contour out to the 3,281 ft depth contour. As needed, divers may be used within the safe air diving range of up to 82 ft for more precise routing or surface lay where burial is not possible. The target burial depth is 6.6 ft. The applicant anticipates using an underwater cable plow of approximately 26.25 ft width within an 82 ft construction corridor to install the cable between the 49 ft and 3,281 ft depth contours. The anticipated temporary sediment disturbance caused by cable burial is 362.6 acres (ac). Sediment disturbance is not anticipated for the surface laid cable.

The submarine route is anticipated to intersect with numerous in-service and out-of-service communication cables but the exact crossing locations were not provided. For crossings with out-of-service cables, the applicant proposes to cut the cable, cap the ends, weight the ends with clump weights, and abandon them on the seafloor without reburial. No intersection with offshore wind energy leases or its potential electric infrastructure is proposed.

Magnuson Stevens Fishery Conservation and Management Act
The Magnuson Stevens Fishery Conservation and Management (MSA) and the Fish and Wildlife Coordination Act (FWCA) require federal agencies to consult with us on projects that may adversely affect EFH and other aquatic resources. Our recommendations may include measures to avoid, minimize, mitigate, or otherwise offset adverse effects on EFH resulting from actions or proposed actions authorized, funded, or undertaken by that agency. This process is guided by the requirements of our EFH regulation at 50 CFR 600.905, which mandates the preparation of EFH assessments and generally outlines each agency's obligations in this consultation procedure.

The project area (where the cable occurs inside the U.S. EEZ) has been designated as EFH for nearly every federally managed species under the purview of the Mid-Atlantic Fishery Management Council (MAFMC) or the New England Fishery Management Council (NEFMC), as well as several highly migratory species (HMS) managed by NOAA Fisheries. Species include, but are not limited to, summer flounder (*Paralichthys dentatus*), scup (*Stenotomus chrysops*), black sea bass (*Centropristis striata*), winter flounder (*Pseudopleuronectes americanus*), windowpane flounder (*Scophthalmus aquosus*), Atlantic herring (*Clupea harengus*), bluefish (*Pomatomus saltatrix*), Atlantic butterfish (*Peprilus triacanthus*), Atlantic mackerel (*Scomber scombrus*), longfin squid (*Doryteuthis pealeii*), Atlantic surfclam (*Spisula solidissima*), Atlantic sea scallop (*Placopecten magellanicus*), red hake (*Urophycis chuss*), white hake (*Urophycis tenuis*), witch flounder (*Glyptocephalus cynoglossus*), monkfish (*Lophius americanus*), butterfish (*Peprilus triacanthus*), golden tilefish (*Lopholatilus chamaeleonticeps*), and several species of skates. There are several HMS also, including shortfin mako (*Isurus oxyrinchus*), swordfish (*Xiphias gladius*), basking shark (*Cetorhinus maximus*), and several other tunas and billfishes.

As the cable route approaches the continental shelf break, the cable is proposed to be located within the broad deep-sea coral zone known as the Frank R. Lautenberg Coral Protection Zone and the discrete coral protection zone known as the Mey-Lindenkohl Slope. Both coral protection zones were established by the Mid-Atlantic Fishery Management Council (MAFMC) and NOAA Fisheries under Amendment 16 to the Squid, Mackerel, and Butterfish Fishery Management Plan (FMP) and became effective January 13, 2017. The MAFMC recognized that deep sea corals are fragile, slow-growing invertebrates that serve an important role in unique and diverse deep sea ecosystems and are particularly vulnerable to bottom-tending fishing gear. The Amendment sets forth the boundaries of the zones and fishing gear restrictions within those zones. The MAFMC established the broad and discrete coral zones based primarily on modeled coral habitat and confirmed presence of deep-sea corals. Confirmed presence of deep-sea corals includes, but is not limited to gorgonian corals (*Acanella spp*.), sea pens (*Pennatulacea spp.*, *Protoptilum* spp., *Kophobelemnon spp., Scleroptilum grandiflorum*), glass sponges (*Hexactinellida spp.*), calcareous sponges (*Leucosolenia spp.*), stony corals (cup corals - *Desmophyllum dianthus*, *Caryophyllia ambrosia*), stony corals (branching - *Solenosmilia variabilis*) and soft corals (*Gersemia fruticosa*).

In addition to the coral protection zones, the proposed cable is also located within the Toms, Middle Toms, and Hendrickson Canyons Habitat Area of Particular Concern (HAPC). This HAPC is a smaller subset of the Mey-Lindenkohl Slope and is recognized as a HAPC under the

New England Fishery Management Council's (NEFMC) Omnibus Habitat Amendment 2 (OHA2), updated in October 25, 2017. HAPCs are a subset of EFH, comprising habitat types and/or geographic areas identified by the one of the regional fishery management councils and NOAA Fisheries as priorities for habitat conservation, management, and research. As discussed in the OHA2, the Toms Canyon complex is topographically and geologically complex, with rather unique sedimentary rock outcrop features. In particular, this includes exposed chalky sedimentary rocks dissected by furrows which are suitable for coral attachment. Various types of corals have been found in the area, including species that inhabit soft sediments and species that require bedrock or other hard substrates for attachment (Hecker and Blechschmidt 1979, Hecker et al. 1983 as cited in the OHA2). Camera tows completed during a July 2012 survey in Toms, Middle Toms, and Hendrickson Canyons, found a diversity of organisms including corals within this area. Most of the corals were octocorals, with fewer stony corals and sea pens observed. While corals were noted on every tow, of the areas examined, the greatest abundances were found in Middle Toms Canyon.

Essential Fish Habitat Conservation Recommendations
Pursuant to Section 305(b)(4)(A) of the MSA we recommend that you adopt the following EFH conservation recommendations to avoid, minimize or offset adverse impacts on EFH:

1. Adjust the cable route to avoid traversing the Toms, Middle Toms, and Hendrickson Canyons HAPC, as well as the Mey-Lindenkohl Slope coral protection area.
2. Beginning at the shelf break (approximately the 565 ft or 200 m contour and the western boundary of the Frank R. Lautenberg Coral Protection Zone), discontinue all pre-lay grapnel and screeding tool cable route clearance activities and subsequent burial of the cable. Instead, surface lay the cable beginning at this contour and continuing down the continental slope and through the remainder of the U.S. EEZ.

Please note that Section 305(b)(4)(B) of the MSA requires you to provide us with a detailed written response to these EFH conservation recommendations, including a description of measures adopted by you for avoiding, minimizing, mitigating, or offsetting the impacts of the project on EFH. In the case of a response that is inconsistent with our recommendations, Section 305(b)(4)(B) of the MSA also indicates that you must explain your reasons for not following the recommendations. Included in such reasoning would be the scientific justification for any disagreements with us over the anticipated effects of the proposed action and the measures needed to avoid, minimize, mitigate, or offset such effects pursuant to 50 CFR 600.920(k). This response must be provided within 30 days after receiving our EFH conservation recommendations. Please also note that further EFH consultation must be reinitiated pursuant to 50 CFR 600.920(j) if new information becomes available, or if the project is revised in such a manner that affects the basis for the above determination.

Endangered and Threatened Species- Endangered Species Act
Federally listed species may be present in the project area. The federal action agency will be responsible for determining whether the proposed action may affect listed species. Please be aware that we have recently provided on our website guidance and tools to assist action agencies with their description of the action and analysis of effects to support their determination. You can also find information about the temporal and spatial distribution of species and their different life

stages on our interactive ESA Section 7 Mapper. If it is determined that the proposed action may affect a listed species, determination of effects, along with justification and a request for concurrence to the attention of the Section 7 Coordinator, nmfs.gar.esa.section7@noaa.gov. After receiving a complete, accurate comprehensive request for consultation, in accordance with the guidance and instructions on our website, we would then be able to conduct a consultation under Section 7 of the ESA. Should project plans change or new information become available that changes the basis for this determination, further coordination should be pursued. If you have any questions regarding these comments, please contact Darcie Webb at darcie.webb@noaa.gov.

We appreciate the opportunity to work with your staff to provide these comments. If you have any questions or need additional information, please contact Kira Dacanay at kira.dacanay@noaa.gov.

Sincerely,

Louis A. Chiarella
Assistant Regional Administrator
for Habitat and Ecosystem Services

cc. USACE - T. Schiable, B. Anthony
NOAA PRD - D. Webb
USFWS - E. Schrading, M. Ciappi
EPA Region 2 - M. Finocchiaro
MAMFC - J. Coakley
NEFMC - M. Bachman
ASMFC - S. Kaalstad
NJDEP - G. Nickerson, K. Davis

Literature Cited

New England Fishery Management Council (NEFMC). 2017. Final Omnibus Essential Fish Habitat Amendment 2. Volume 2: EFH and HAPC Designation Alternatives and Environmental Impacts. Prepared by the New England Fishery Management Council in cooperation with the National Marine Fisheries Service. https://d23h0vhsm26o6d.cloudfront.net/OA2-FEIS_Vol_2_FINAL_171025.pdf