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 22, 2026
via electronic mail

Peter Weppler, Chief
Environmental Analysis Branch
Planning Division
New York District
U.S. Army Corps of Engineers
26 Federal Plaza
New York, NY 10278-0900

RE: Draft Integrated General Reevaluation Report and Environmental Assessment
Sandy Hook to Barnegat Inlet, Sea Bright to Manasquan, New Jersey
Coastal Storm Risk Management General Reevaluation Study

Dear Mr. Weppler:

We have reviewed the draft integrated general reevaluation report (GRR) and environmental assessment (EA) for the Sandy Hook to Barnegat Inlet, Sea Bright to Manasquan, New Jersey Coastal Storm Risk Management General Reevaluation Study dated October 2025 by the US Army Corps of Engineers (USACE), New York District. The proposed project includes dredging and placement of sand from offshore borrow areas to create a dune and berm complex along 21 miles of shoreline from the Borough of Sea Bright to the Manasquan Inlet in Monmouth County, New Jersey, which are the first two of three sections of the existing Sandy Hook to Barnegat Inlet Beach Erosion Control Project. The construction of the existing project was initiated in 1994; Section I (Sea Bright to Loch Arbour) was completed in 1998, except for Elberon, Deal, Allenhurst, and Loch Arbour, which was completed in 2016 and construction of Section II (Asbury Park to Manasquan) was completed in 2000.

Based upon the information provided, dredging is proposed to retrieve material from the existing Sea Bright Offshore Borrow Area (SBOBA) and an unknown number of additional borrow areas offshore the coast of Belmar, New Jersey that are currently being investigated in a separate EA effort. As indicated in the January 8 and January 14, 2026, emails from Katie Amirr of your staff, initially only material from the SBOBA will be used, but additional borrow areas will be needed over the project life. Additionally, the essential fish habitat (EFH) assessment states that renourishment cycles are not included under the EFH assessment included with the EA, however the proposed action described in the EA includes multiple beach renourishment activities as part of the 18-year activity cycle. Because the EFH assessment evaluates the effects of only a single placement cycle and does not address cumulative and synergistic effects, our comments and EFH conservation recommendations pursuant to the Magnuson Stevens Fishery Conservation and Management Act (MSA) for project activities are provided for the placement of sand along the shoreline using dredged sand from the SBOBA and for the initial placement activities only. EFH consultation must be reinitiated for the use of other borrow areas and for future renourishment activities.

Project Description
The tentatively selected plan (TSP) consists of a +16 foot (ft) North American Vertical Datum of 1988 (NAVD88) crest elevation dune and 100 ft wide berm. The extent of the dune would vary based on local conditions and topography, though the seaward toe of the dune would generally extend approximately 90 ft east of the existing project baseline. To maintain the existing berm width at the same elevation, the berm would extend 52 ft further seaward than the existing project and up to 92 ft if advanced fill is implemented into the design. The 18-year plan selected by your agency involves the placement of approximately 2.2 million cubic yards (cy) of sand for the initial dune and berm placement, slated to begin in 2031. Periodic renourishment of 2.5 million cy of sand is expected every six years over the life of the project, which is to be covered under a separate authorization. The proposed sand source for the project includes the existing SBOBA, located approximately 15 miles away from the midpoint of the project area.

Authorities
As you are aware, the MSA and the Fish and Wildlife Coordination Act (FWCA) require federal agencies to consult with one another on projects such as this. Because this project affects essential fish habitat (EFH), this process is guided by the requirements of our EFH regulation at 50 CFR 600.905, which mandates the preparation of EFH assessments, lists the required contents of EFH assessments, and generally outlines each agency's obligations in this consultation procedure. The FWCA also requires federal action agencies to consult with us "with a view to the conservation of wildlife resources by preventing loss of and damage to such resources as well as providing for the development and improvement thereof in connection with such water-resource development" (16 USC 662).

To support our EFH CRs and to assist you with the development of the final GRR/EA, future EAs related to additional renourishment cycles, and the use of other borrow areas we offer the following comments under the MSA and FWCA.

General Comments
Proposed Action
The EFH assessment describes the project location as between Sea Bright to Manasquan, but the draft GRR/EA only seems to describe existing conditions for Asbury Park to Manasquan. The location for project activities should be consistent between all final reports. The EFH assessment also states that a cutterhead or hopper dredge will be used to dredge sand from borrow areas and that a pipeline will be used to place the material. It is not clear if this is the only equipment to be used for the initial dredging and placement activities, or if other equipment may be used for grading or other activities related to the action. Renourishment cycles are also not included under the EFH assessment, yet renourishment activities are mentioned to be part of the 18-year activity cycle. Future assessments should include a description of all of the activities anticipated over the full life of the project, inclusive of materials, methods, and anticipated schedule so the direct, indirect, and cumulative impacts of the project can be evaluated.

Habitat
The EFH assessment and draft GRR/EA do not include a complete description of the existing habitats from Sea Bright to Asbury Park as well as the proposed borrow areas. Instead of a

habitat description, a Biological Monitoring Program conducted between 1994-2000 is referenced. However, the survey referenced is not a replacement for a physical description of the existing habitat. Site specific habitat characteristics are compared to habitat descriptions described in fisheries management plans (FMPs), to determine which federally-managed species and life stages use a project area. The FMPs are what defines EFH for federally managed species. Site specific habitat characteristics are also needed to understand how habitats are used for project activities so the effects can be evaluated. This includes a quantification of the area of the habitat that may be adversely affected, depths, sediment composition, and benthic communities.

While we appreciate that there were some fish surveys in the vicinity of the project area, surveys are a snapshot in time. Additionally, the survey undertaken during the Biological Monitoring Program was between 26 to 32 years ago and the details of the survey including timing, survey methods, equipment used, and how much of the survey area overlaps with the existing project area were not included in the materials provided. A Northeast Area Monitoring and Assessment Program (NEAMAP) trawl survey was also referenced throughout the species assessment sections of the EFH assessment. However, it is unclear where these surveys took place in reference to the project area and if the data is comparable to the original Biological Monitoring Program. A full description of the habitats within the project area, including the placement and proposed and borrow areas should be included in all final reports and assessments.

Direct, Indirect, and Cumulative Impacts

The mining of sand from the borrow areas may change the geomorphic characteristics of these areas. We are particularly concerned with impacts to features that may not recover or currently provide valuable habitat for fish and shellfish, especially Atlantic surfclam (*Spisula solidissima*). As you evaluate alternative borrow areas, consideration should also be given to shoals that may be present. Shoals are dynamic and irreplaceable features that diversify the sea floor, producing a variety of substrate types and foraging opportunities for finfish and epibenthic fauna. These areas also serve as congregating features for finfish and provide guiding features for coastal migratory species. For future assessments, long-term or permanent alteration of the sediment characteristics and topography of the borrow areas, and the individual and cumulative effects to sand shoals and to surfclams and their EFH should be discussed. To determine if any long-term adverse effects have occurred, you should also conduct sampling of each of the borrow areas at regular intervals to monitor sediment characteristics and use of the area by benthic organisms, including surfclams.

Alternatives, Avoidance, and Minimization

We appreciate that the draft GRR/EA includes an alternatives analysis for the dune and berm portion of the project. Future assessments that may consider multiple borrow areas should also include a discussion on how the alternatives avoid and minimize effects to EFH. Additionally, while the concept of using construction best management practices (BMPs) was mentioned in both the EFH assessment and draft GRR/EA, specific details of the BMPs proposed were not included.

The EFH assessment also referenced EFH conservation recommendations (CRs) provided on April 16, 2014, for renourishment activities that are not included under this assessment. The CRs included the following:

- Notification should be provided to our office prior to commencement of each dredging event and should include the location of the segment to be nourished, volumes of sand to be dredged, depth of sand to be removed, and the boundaries of the dredging within the borrow area.
- Annual reporting of the acres of borrow area disturbed, the location of the dredging, cubic yardage removed, depth of removal, and post dredging bathymetry of the borrow area.
- Avoid working on the Deal Lake and Lake Takanassee outfall and adjacent beach from 3/1 to 6/30 to allow migration of alewife and blueback herring into the lakes to spawn and from 9/1 to 11/30 to allow out migration. If work occurs in the fall, measures should be taken to prevent blockage of outfalls.

It is unclear why these CRs were referenced and if they will be incorporated into the current project or future renourishment cycles. While these CRs were specific past renourishment activities, they are still applicable and should be incorporated into the current project including the current and future renourishment events. Except for the referenced CRs, no other avoidance and minimization measures for the project for initial dredging or placement activities were included in the EFH assessment or draft GRR/EA. A full description of all BMPs and avoidance and minimization measures that will be incorporated into the project should be included in future environmental and EFH assessments, so we can better tailor our comments and EFH CRs to activities proposed and their impacts to EFH.

Magnuson Stevens Fishery Conservation and Management Act
The project area has been designated as EFH under the MSA for a number of federally managed Species including but not limited to winter flounder (*Pseudopleuronectes americanus*), windowpane (*Scophthalmus aquosus*), Atlantic herring (*Clupea harengus*), bluefish (*Pomatomus saltatrix*), Atlantic butterfish (*Peprilus triacanthus*), summer flounder (*Paralichthys dentatus*), Atlantic surfclam, black sea bass (*Centropristus striata*), red hake (*Urophycis chuss*), longfin inshore squid (*Doryteuthis pealeii*), several species of skates, and a number of highly migratory species such as sand tiger shark (*Carcharius taurus*), sandbar shark (*Charcharhinus plumbeus*) and others.

The outfalls along the Atlantic ocean leading to Deal Lake in Asbury Park and Takanassee Lake are also migratory and spawning corridors for anadromous fish such as alewife (*Alosa pseudoharengus*) and blueback herring (*Alosa aestivalis*) (collectively river herring). River herring, spend most of their adult life at sea, but return to freshwater areas to spawn in the spring. Both species demonstrate some degree of repeat spawning behavior, generally returning to their natal rivers. Following spawning, some proportion of adults out-migrate to the ocean while their offspring rear in freshwater areas. River herring are prey items for a number of federally managed species such as juvenile bluefish, windowpane flounder, and summer flounder. Activities that impact prey items may adversely impact EFH and our managed species. In addition, adverse impacts to EFH can occur both inside or outside areas designated as EFH.

The dredging of sand for beach nourishment has the potential to impact both the EFH of a particular species as well as the organisms themselves in a variety of ways. Dredging can damage fishery resources and their habitats through direct impingement of eggs and larvae, through the creation of undesirable suspended sediment levels in the water column, and through deposition of sediments on immobile eggs and early life stages. Suspended sediment levels in the can reduce dissolved oxygen, mask pheromones used by migratory fish, and smother immobile benthic organisms or juvenile demersal fish. Sustained turbidity in the water column can also reduce the feeding success of sight-seeing feeder fish such as winter flounder, tautog, and summer flounder. Dredging can also remove the substrate used by federally managed species as spawning, refuge and forage habitat. Benthic organisms that are food sources for federally managed species may also be removed during the dredging. These impacts may be temporary in nature if the substrate conditions return to preconstruction condition and the benthic community recovers with the same or similar organisms. The impacts may be permanent if the substrate is altered in a way that reduces its suitability as habitat, if the benthic community is altered in a way that reduces its suitability as forage habitat or if the dredging occurs so often that the area does not have time to recover.

We are particularly concerned with the direct and cumulative effects on surfclams and their EFH. According to the EFH assessment, surfclams were found in the SBOBA as part of the 2014 *Atlantic Coast of New Jersey Sandy Hook to Barnegat Inlet Beach Erosion Control Project, Section I – Sea Bright to Ocean Township: Elberon to Loch Arbour Reach. Integrated Hurricane Sandy Limited Reevaluation Report and Environmental Assessment.* While surfclams are not present in the shoreline areas according to recent NEAMAP surveys, it's unclear where and how abundant surfclams are within the SBOBA, as well as how impacts to surfclams will be avoided and minimized. In 2024, NJ commercial surfclam landings were over 14.3 million pounds with a value of over $16.8 million dollars (https://www.fisheries.noaa.gov/foss/f?p=215:200:13329021461950:::::). The EFH assessment indicates that individuals may be captured during dredging activities and potential impacts would be minimized through the implementation of BMPs, which are not described. The repeated dredging may alter the sediment characteristics of the borrow area and change the topography in a manner that may make the areas less suitable for surfclams. Without more information on the existing presence and effects of repeated dredging on surfclams and their habitat, we recommend that you include sampling of surfclam densities within the SBOBA as part of the SBOBA management plan you are currently drafting and survey for surfclams within the SBOBA between each renourishment cycle so areas with higher densities of surfclams can be avoided. Sampling data should be displayed on a map over the borrow area. Depths and sediment data should be included on the map as well. A similar map should be produced after each monitoring event. This sampling effort should also be applied to future borrow areas to document the presence of surfclams and allow for avoidance of areas of high density.

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. Avoid working on the adjacent beaches to the Deal Lake and Lake Takanassee outfalls from 3/1 to 6/30 to allow migration of river herring alewife and blueback herring into the

lakes to spawn and from 9/1 to 11/30 to allow out migration. If work occurs in the fall, measures should be taken to prevent blockage of outfalls.

2. Provide detailed construction BMPs that will be incorporated into the project prior to the initiation of project construction.
3. Provide current (within the past 5 years) mapping with densities of surfclams within the SBOBA prior to dredging and placement activities.
    a. Include depths and sediment characteristics.
4. Areas of high surfclam densities within the SBOBA should be avoided.
5. Monitor surfclams within the SBOBA between every dredge event to determine use and to document avoidance areas.
6. Notify our office prior to commencement of each dredging event and include the location of the segment to be nourished, volumes of sand to be dredged, depth of sand to be removed, and the boundaries of the dredging within the borrow area.
7. Report annually of the acres of borrow area disturbed, the location of the dredging, cubic yardage removed, depth of removal, and post dredging bathymetry of the borrow area.

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 the measures adopted by you for avoiding, mitigating, or offsetting the impact 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 effect 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 a distinct and 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 EFH conservation recommendations.

Technical Assistance

To assist you with drafting the final GRR/EA and for future assessments related to the proposed new borrow area(s) and future renourishment events which were not considered in the EFH assessment included with the draft GRR/EA, please be sure to provide an EFH assessment that fully evaluates all of the direct, indirect, individual and cumulative effects of the proposed project on EFH with your EFH determination.

The mandatory contents of an EFH assessment include:

- A description of the action.
- An analysis of the potential adverse effects of the action on EFH and the managed species.
- The federal agency's conclusions regarding the effects of the action on EFH.
- Proposed mitigation, if applicable.

Additional information, if appropriate, the assessment should also include:

- The results of an on-site inspection to evaluate the habitat and the site-specific effects of the project.

- The views of recognized experts on the habitat or species that may be affected.
- A review of pertinent literature and related information.
- An analysis of alternatives to the action. Such analysis should include alternatives that could avoid or minimize adverse effects on EFH.
- Other relevant information.

Please note that the definition of adverse effect from the EFH Final Rule is as follows:

> *Adverse effect* means any impact that reduces quality and/or quantity of EFH. Adverse effects may include direct or indirect physical, chemical, or biological alterations of the waters or substrate and loss of, or injury to, benthic organisms, prey species and their habitat, and other ecosystem components, if such modifications reduce the quality and/or quantity of EFH. Adverse effects to EFH may result from actions occurring within EFH or outside of EFH and may include site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions.

The level of detail in an EFH assessment should be commensurate with the complexity and magnitude of the potential adverse effects of the action. A detailed EFH assessment should be developed and submitted to us including:

- A full and complete evaluation of all of the impacts of the proposed project on EFH.
    - Include all existing habitats within the project area, inclusive of placement and alternative dredging areas.
        - This includes a quantification of the area of the habitat that may be adversely affected, depths, sediment composition, and benthic communities.
        - If studies/surveys are included, they should provide details of the survey including timing, survey methods, equipment used, and how much of the survey area overlaps with the existing project area.
        - Areas should also be quantified.
    - Consider all of the direct, indirect, individual, and cumulative effects of the action on EFH and federally managed species.
        - This includes repeated dredging in the borrow areas, and the potential permanent loss of sand shoals and changes in sediment characteristics as well as the individual and cumulative effects to surf clams and their EFH.
    - Include temporary and permanent changes to the habitat such as the loss or conversion of aquatic habitats and impacts to prey species from all of the activities.
- Project plans that clearly show all of the work proposed and the habitats affected.
    - Include areas of sand shoals or surfclam habitat that should be avoided.
- A clear and detailed description of all of the construction activities proposed including materials, methods (inclusive of BMPs), and timeframes for construction.
- A full and complete analysis of alternatives to the action, which includes alternatives that could avoid or minimize adverse effects on EFH.
- Results of site specific surveys for new areas included in the project (i.e., new borrow areas).

The EFH assessment should consider the full range of effects of the construction activities associated with the dredging of material as well as each time material will be placed in the project area. The analysis of effects should focus on impacts that reduce the quality and/or quantity of the habitat or result in conversion to a different habitat type for all life stages of species with designated EFH within the study area. Simply stating that fish will move away or that the project will only affect a small percentage of the overall population is not a sufficient analysis of the effects of an action on EFH. Also, since the intent of the EFH consultation is to evaluate the direct, indirect, individual and cumulative effects of a particular federal action on EFH and to identify options to avoid, minimize or offset the adverse effects of that action, it is not appropriate to conclude that an impact is minimal just because the area affected is a small percentage of the total area of EFH designated. The focus of the consultation is to reduce impacts resulting from the activities evaluated in the assessment. Similarly, a large area of distribution or range of the fish species is also not an appropriate rationale for concluding the impacts of a particular project are minimal.

Endangered Species Act

Threatened or endangered species under the jurisdiction of NMFS may be present in the project area. We understand that you are currently coordinating with our Protected Resources Division. Should you have any additional questions related to your consultation on Section 7 of the Endangered Species Act, please contact Edith Carson-Supino at edith.carson-supino@noaa.gov.

Conclusion

As always, we are available to discuss this project, needed information and analysis, and the EFH consultation with you or your staff if you have any questions or require clarification on our comments. If you have any questions or need additional information, please do not hesitate to contact Jessie Murray at jessie.murray@noaa.gov or (732) 872-3116.

Sincerely,

Karen M. Greene 2026.01.22 15:24:41 -05'00'

For

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

cc: GARFO PRD – E. Carson-Supino
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