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The United States Needs a National Reefing Program

The National Plan

In March, 2008 representatives from both governmental and non-governmental organizations (NGOs) of several reefing states held a joint meeting in New Jersey. One of the things learned during that meeting was that, in fact, the Navy and the Maritime Administration (MARAD) do not appear to really want ships reefed. It is easier for them to pay a private contractor to haul them away and dismantle them. By making it difficult and expensive to get a ship for reefing, they can limit, or even eliminate the program. Navy and MARAD make only an occasional ship available to the states and make them compete for it. This makes the states so eager to get a ship that they will accept the "as is – where is" policy. "As is – where is" means that whoever gets the ship, is stuck with all the expenses, including cleaning it of toxics, which for recycling and SinkEX is paid for by Navy or MARAD. In addition, the Federal Government retains ownership of recycled vessels until they are completely dismantled, but does not for reefing.

In law, reefing is named as an equally valid disposal method for ships, yet it is being treated differently, to the detriment of our programs and the nation. The *USAFS General Hoyt S. Vandenberg* is a case in point: First, the amount of toxics aboard was tremendously understated, whether by accident or design, no one knows. Second, EPA changed the rules on how clean she had to be in the middle of the game, causing massive cost overruns. The *USS Kittiwake* was recently donated to the Republic of the Cayman Islands, "as is – where is". **The result is that reefing organizations of the U. S. are being treated no better than a foreign government.**

The Navy and MARAD can currently recycle a MAXIMUM of 16 ships per year because there are only 8 certified yards to perform the work, one on the West Coast. More ships than that are placed in disposal status each year. Instead of shrinking, inventory is actually increasing. Navy and MARAD have no incentive to reef vessels because neither will ever see the money that reefing generates to the Local, State and Federal tax base as it flows into the General Funds, not their budgets, and, as stated above, having someone else haul it away and dismantle it is easier. The ONLY way we will get Navy and MARAD to give reefing equal or preferred status as a disposal method will be to have Congress direct them to comply with the law and cooperate with reefing organizations. NAVY and MARAD must also start talking to the NGOs who are doing the majority of reefing activities in their states. **Without this effort, there is an extremely good chance that we will NEVER see another ship donated.**

Ship-based artificial reefs have demonstrated that they are not only economically beneficial to the ports and communities local to them, but to the State, Federal and Local Government treasuries as well, and are also beneficial in the creation and/or enhancement of habitat for many species of marine life.

The development and implementation of a United States National Reefing Program is of the utmost importance to the economies of the coastal States and the environment of the oceans bordering them.

This program should contain **AT A MINIMUM**, provisions as follows:

1. Reefing of surplus Navy and Maritime Administration (MARAD) vessels shall be the preferred method of disposal unless these vessels are needed for live-fire training purposes (SinkEX) or there are other compelling reasons for other disposal, i.e., nuclear powered vessels.
2. That equitable allotment of ships to the various States with reefing programs shall be made on a continuing basis.
3. That NGOs engaged in reefing activities which have established a working relationship (Public/Private Partnership) with their State Governments be recognized and dealt with in good faith by Navy and MARAD.
4. That Navy and MARAD be responsible for the removal of all toxic materials and wire in these vessels prior to donation for reefing, or to provide a grant to cover the full cost thereof with a vessel, and retain title to the vessel until the actual reefing event.
5. That the National Guidance: Best Management Practices for Preparing Vessels Intended to Create Artificial Reefs, filed in the Federal Register, May, 2006 be adopted as the Federal Standard for permitting on a programmatic basis.