

**REPORT TO CONGRESS:
COASTAL BARRIER RESOURCES SYSTEM**

Recommendations for Additions to or Deletions from
the Coastal Barrier Resources System

**VOLUME 11
NORTH CAROLINA**

U.S. Department of the Interior



REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

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**Recommendations for Additions to or Deletions from
the Coastal Barrier Resources System**

NORTH CAROLINA

Mapped, edited, and published by the Coastal Barriers Study Group

United States Department of the Interior
William P. Horn, Assistant Secretary for Fish and Wildlife and Parks

1988

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NORTH CAROLINA

INTRODUCTION

The Coastal Barrier Resources Act (CBRA) of 1982 (Public Law 97-348) established the Coastal Barrier Resources System (CBRS), a system of undeveloped coastal barriers along the Atlantic and Gulf of Mexico coasts. This atlas of coastal barriers in North Carolina has been prepared in accordance with Section 10 of CBRA (16 U.S.C. 3509), which states:

Sec. 10. Reports to Congress.

(a) In General.--Before the close of the 3-year period beginning on the date of the enactment of this Act, the Secretary shall prepare and submit to the Committees a report regarding the System.

(b) Consultation in Preparing Report.--The Secretary shall prepare the report required under subsection (a) in consultation with the Governors of the States in which System units are located and with the coastal zone management agencies of the States in which System units are located and after providing opportunity for, and considering, public comment.

(c) Report Content.--The report required under subsection (a) shall contain--

(1) recommendations for the conservation of fish, wildlife, and other natural resources of the System based on an evaluation and comparison of all management alternatives, and combinations thereof, such as State and local actions (including management plans approved under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.)), Federal actions (including acquisition for administration as part of the National Wildlife Refuge System), and initiatives by private organizations and individuals;

(2) recommendations for additions to, or deletions from, the Coastal Barrier Resources System, and for modifications to the boundaries of System units;

(3) a summary of the comments received from the Governors of the States, State coastal zone management agencies, other government officials, and the public regarding the System; and

(4) an analysis of the effects, if any, that general revenue sharing grants made under section 102 of the State and Local Fiscal Assistance Amendments of 1972 (31 U.S.C. 1221) have had on undeveloped coastal barriers.

Under the direction of the Assistant Secretary for Fish and Wildlife and Parks, this report has been prepared by the Coastal Barriers Study Group, a task force of professionals representing the National Park Service, U.S. Fish and Wildlife Service, U.S. Geological Survey, and other Departmental offices.

This volume of the report contains delineations of the existing CBRS units in North Carolina and delineations of additions to and modifications of the CBRS in this State which the Department of the Interior recommends to the Congress for its consideration.

BACKGROUND

The State of North Carolina has 23 separate islands on an ocean coastline 324 miles in length. The coast is characterized by gently sloping sandy beaches, small sand dunes, larger dune fields and maritime forests in broad areas, and back barrier marsh complexes. North of Morehead City, the barrier islands form the seaward boundary of Albemarle and Pamlico Sounds. Wave energy is the dominant agent shaping the shoreline and has formed long narrow barriers with relatively few tidal inlets. Two significant public holdings, Cape Hatteras and Cape Lookout National Seashores, constitute 127 miles of ocean frontage. Additional Federal and State lands open to the public, combined with the National Seashores, result in 48 percent of the ocean coast being in public ownership.

Natural resources are abundant in the coastal region; the North Carolina estuarine system is the second largest among the lower 48 states. The estuarine system is composed of 4,500 square miles of shallow sounds, bays, tidal creeks, and salt marshes. These habitats for crabs, shrimp, shad, striped bass, Atlantic croaker, flounder, and mullet provide abundant quantities of finfish and shellfish. Waterfowl and shorebirds traverse this region in large numbers during spring and fall. Migratory bird populations are high during spring after they spend the winter farther south.

The general development pattern in the past was low density residential and recreational development; however, high density development is dramatically increasing. Industry in the coastal area is mostly agriculture, manufacturing, mining (phosphate and peat), and tourism. Two deep-water ports, at Morehead City and Wilmington, handle a great deal of shipping commerce both in export and import cargo.

COASTAL RESOURCE MANAGEMENT

North Carolina Coastal Resource Management

North Carolina's coastal management program was passed by the State legislature in 1974. Prior to that date there was no specific State authority to manage coastal development. Problems associated with polluted shellfishing areas and unsafe beachfront developments prompted the passage of a dredge and fill permit law in 1969. This was incorporated later into the Coastal Area Management Act (CAMA). The CAMA legislation emerged as an experiment in land-use planning and has been controversial since its inception.

The primary policymaking and regulatory body under CAMA is the 15-member Coastal Resources Commission (CRC). Its members are appointed to staggered 4-year terms by the Governor and must, by statute, represent various interest groups such as agriculture, marine biology, and commercial fisheries. A 47-person Coastal Resources Advisory Council (CRAC) advises the CRC and is composed mostly of coastal residents appointed by county commissioners and municipal officials in the 20-county coastal area. The Council members also serve as liaisons with their respective local governments. The Division of Coastal Management (DCM) in the Department of Natural Resources and Community Development provides the staff for the CRC and the CRAC and is charged with carrying out the policies and programs adopted under CAMA. The North Carolina Management Program joined the Federal Coastal Zone Management Program in 1978.

The main elements of CAMA are local land use planning, regulations for development in areas of environmental concern, and permit coordination in the State's 20 coastal counties. Special programs for beach access and estuarine sanctuaries are also included. A brief discussion of the major elements of CAMA follows.

Comprehensive land-use plans. CAMA requires land-use plans for all 20 of the State's coastal counties. If county governments do not prepare plans, the Coastal Resources Commission must adopt a plan for them. Counties may delegate the responsibility of planning for municipal areas to the municipal governments. By 1976, 19 counties and 34 municipalities had adopted their own plans. By 1983, all 20 counties and 53 municipalities had done so. All plans must be updated every 5 years.

Permits. A second part of the CAMA program is the issuance and review of permits for any development in environmentally sensitive

coastal areas. The CRC designates areas of environmental concern (AEC) and sets standards as mandated by CAMA. Four categories of AEC have been designated: the estuarine system, ocean hazard areas, public water supplies, and natural and cultural resource areas. The AEC's cover about 3% of the land area in the coastal counties and all coastal waters; these are the only areas that require CAMA permits. Permits in AEC's guide development through the use of performance standards and fall into two categories: major development and minor development.

Major development permits are required for any development over 20 acres, any structure covering more than 60,000 square feet, or any project requiring another State or Federal permit. These permit applications are administered by DCM staff based on a comprehensive review by all interested State and Federal agencies. Minor development permits are required of all developments that do not qualify as "major," such as home construction or other upland developments that disturb less than one acre of ground. Minor development permits are administered by a permit officer within the local government who is trained and funded by DCM. Approximately two-thirds of all CAMA permits are classified as minor. All development, whether major or minor, must follow the same guidelines for development.

The State has adopted an oceanfront setback based on the long-term average annual erosion rate. Small structures must be located a distance of at least 30 times the long-term average annual erosion rate from the first line of stable natural vegetation, with a minimum setback of 60 feet. Larger structures, including any building with more than four residential units or 5,000 square feet total floor area, must be set back a distance of 60 times the erosion rate with a minimum of 120 feet from the vegetation line. All structures must also be located behind the crest of the primary dune (the first dune with an elevation equal to the 100-year storm level plus 6 feet), and/or behind the landward toe of the frontal dune (the first dune back from the vegetation line).

The single (30 times) and double (60 times) setbacks do not always correlate with the divisions into minor and major development. For example, an 8-unit motel, which would be required to comply with the double setback for large structures, often will be a minor development for permitting purposes and the permit, therefore, will be issued by a local permit officer.

Federal project review. Another part of the CAMA permit program is the review of Federal projects in the coastal area for consistency with the coastal management program. If a State permit is denied, the Federal agency cannot issue a Federal permit for the project. On the other hand, if a State permit is issued, the Federal agency can still deny the Federal permit based on Federal regulations. Overall, the CAMA program streamlines the permit process. A CAMA permit in an AEC satisfies five State and Federal permits.

Additional programs included in CAMA. Other programs include a beach access program designed to improve public access to beaches

and coastal waters, and the estuarine sanctuary program, which protects and preserves valuable estuarine areas for scientific study and public enjoyment.

These additional components help provide a thorough and comprehensive coastal management program in North Carolina. This management system is designed to effectively manage long- and short-term growth and changes along the coast.

Taxes. An income tax credit has been initiated for individuals or corporations that make qualified donations of interests in real property for conservation purposes (N.C. General Statute 105-130.34, enacted 1983). The credit will equal 25% of the fair market value of the donated property interest, up to a maximum credit of \$5,000 for a taxable year. Credits are allowed for gifts of interest in real property useful for public beach access, public access to public waters or trails, fish and wildlife conservation, or other conservation purposes found suitable by the State Department of Natural Resources and Community Development.

Another State law (G.S. 105-275) exempts from property taxes any real property owned by a qualified nonprofit organization that holds and uses the land as a "protected natural area" for educational and scientific purposes.

Local Actions

Taxes. Land assessments for tax purposes generally are made every 8 years and will not be calculated again for several years. Most undeveloped lands, however, are generally valued lower for tax purposes. An exception is the Topsail Island undeveloped area. Recent development there has had an approximately \$10 million impact on the Onslow County tax base. A major percentage of this increase is the \$5.3 million in improvements by the developers of the Topsail Dunes Complex (Godschalk 1984).

Permits and zoning. Local CAMA officials are in charge of permitting on minor development projects in coastal counties. Their responsibilities have been discussed previously and no further changes or modifications on a local level have occurred.

In early 1984, two minor zoning changes were enacted in the New Hanover County land-use plan. One change prohibits residential development on undeveloped barrier islands with no evacuation network of roads and bridges; the second adds a subdivision ordinance which requires hurricane evacuation plans in certain areas.

The coastal region in North Carolina has continued to experience growth and development, particularly during the past 5 years. High density multifamily and commercial construction has become the development pattern in the Topsail unit (L06).

Private sector initiatives. According to a local official, an initiative undertaken by the private sector involves donations and bargain sales of some tracts for conservation purposes; e.g., Pamlico Properties, Inc. has designated a protected wilderness area.

EXISTING CBRS UNITS

In general, the CBRS units in North Carolina are barrier beaches and associated wetlands. The Hatteras Island unit (L03) is on the Pamlico Sound side of Cape Hatteras.

A brief description of each existing CBRS unit in North Carolina is provided below. Each unit is identified by its ID code and name (established by Congress in 1982) and the county in which it is located.

L01-Currituck Banks (Currituck). This unit includes vegetated dune ridges with back barrier flats, tidal marshlands, beachfront, and extensive actively migrating dune fields. The unit abuts False Cape State Park in Virginia and Currituck National Wildlife Refuge is part of this unit. Abundant species of shorebirds, seabirds, waterfowl, and marshbirds use this area for breeding and wintering grounds. This unit is accessible by sand roads from both the north and south. Recently, single family units and an associated canal system have been constructed. House lots have been subdivided in some areas, particularly near the Virginia border.

L03-Hatteras Island (Dare). This unit consists of vegetated beach ridges, back barrier flats, and open water. The unit is used mostly for recreation, although some logging has been done in Buxton Woods. A State highway, NC Highway 12, borders part of the unit.

L03A-Shackleford Banks (Carteret). This unit is within Cape Lookout National Seashore and was privately owned until 1982. Vegetated dune ridges, tidal marshlands, and beach/dune systems are typical environments of this unit.

L05-Onslow Beach Complex (Onslow). This unit is composed of two barriers which shelter extensive wetlands including tidal marshlands, vegetated dune ridges, active beach/dune systems, and ebb-tidal shoals. A light duty road along the western two-thirds of the unit provides access. A substantial development of approximately 20 structures is located in the middle of the southern island at Onslow Beach. The entire unit is part of Camp Lejeune Military Reservation.

L06-Topsail (Onslow). This unit contains tidal marshlands and ponds, vegetated beach/dune ridges, and active shoreface beach/dune complexes. Topsail Island is an important migration and wintering ground for waterfowl, shorebirds, and marshbirds. An improved road, Route 210, runs through the unit. Construction of a condominium complex in this unit is underway. Development pressure is a critical issue in this unit.

L07-Lea Island Complex (Pender and New Hanover). This unit includes two sections, Lea Island and Hutaffs Beach, both of which are accessible by boat only. Characteristic environments include tidal marshlands, tidal creeks, and low beach/dune complexes.

Approximately seven structures are now located on these islands. However, a development project of 57 units, including a

CBRS UNITS IN NORTH CAROLINA ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	County	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Currituck Banks	L01	Currituck	11.3	8,260.1	2,519.1
Hatteras Island	L03	Dare	0.0	328.7	134.8
Shackleford Banks	L03A	Carteret	9.5	8,527.6	2,041.5
Onslow Beach Complex	L05	Onslow	10.1	2,962.0	1,250.1
Topsail	L06	Onslow	6.3	2,617.8	902.1
Lea Island Complex	L07	Pender and New Hanover	5.1	3,373.3	414.7
Wrightsville Beach	L08	New Hanover	1.1	307.3	117.4
Masonboro Island	L09	New Hanover	9.1	5,202.0	1,098.2
Waites Island Complex	M01	Brunswick	2.1	334.0	132.0
Totals:			54.6	31,912.8	8,609.9

20-slip docking facility, is planned and at least 10 of these units have already been sold.

L08-Wrightsville Beach (New Hanover). This unit has a beach length of about 1.1 miles, and is accessed by bridge and paved road. Characteristic environments include tidal marshlands, ebb-tidal delta, beach/dune systems, and some vegetated high ground (spoil sites). Developments are located north and south of the unit.

L09-Masonboro Island (New Hanover). This unit includes extensive tidal wetlands, vegetated spoil islands, an inlet system (Masonboro Inlet), and an active beach/dune complex. Many shorebirds use this island as a nesting area. Masonboro Island is authorized as part of the North Carolina National Estuarine Sanctuary. The unit is accessed by boat only.

M01-Waites Island Complex (Brunswick). The North Carolina portion of this unit contains a sand spit extending south from Bald Beach and Bird Island, into New River Inlet.

REFERENCE

Godschalk, D.R. 1984. Impacts of the Coastal Barrier Resources Act, Report to NOAA, January, 1984.

RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in North Carolina be added to the Coastal Barrier Resources System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. One existing CBRS unit, L03A, Shackleford Banks, is now owned by the National Park Service and part of another unit, L01, Currituck Banks, is included in Currituck National Wildlife Refuge; the Department recommends that those areas be deleted from the CBRS. However, if any otherwise protected, undeveloped coastal barrier is ever made available for development that is inconsistent with the purposes

of the CBRA, the DOI recommends that it then be automatically included in the CBRS. A complete discussion of DOI's recommendations concerning otherwise protected, undeveloped coastal barriers, including suggested guidelines for acceptable development, appears in Volume 1. Maps of all otherwise protected, undeveloped coastal barriers in North Carolina appear in the following section.

The DOI also recommends that all military and Coast Guard lands on coastal barriers be excluded from the CBRS. Onslow Beach (L05) is part of the Marine Corps' Camp Lejeune Military Base; the Department recommends that this unit be deleted from the CBRS. A table presenting the Department's position on each unit or proposed unit identified in North Carolina follows this discussion.

The Department of the Interior's recommendations were developed after full consideration of the many public, State and Federal agency, and Congressional comments on the delineations in the Draft Report released in March 1987. The State of North Carolina reviewed this Draft Report and supports the CBRS expansion in North Carolina. The State opposes deleting and excluding otherwise protected coastal barriers and military lands on undeveloped barriers from the CBRS. The State made no specific comments on individual existing or proposed CBRS units. The State's positions on the DOI's general recommendations are discussed in Volume 1.

The Department received 14 other comment letters concerning North Carolina. Eight of these supported the CBRS expansion and six opposed the deletion of military and Coast Guard lands from the CBRS, especially L05, Onslow Beach Complex. Three letters suggested Bald Head Island, in southern North Carolina, should be added to the CBRS. All of Bald Head Island that is not otherwise protected, however, is in the process of being developed and thus does not qualify for addition to the CBRS. The North Carolina Department of Cultural Resources wrote supporting the CBRS expansion because it will help prevent destruction of valuable archaeological and historic sites. Substantive public comments concerning individual existing or proposed CBRS units are discussed and reprinted in the following section, interspersed with the appropriate maps.

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN NORTH CAROLINA

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shoreline Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
L01	Currituck Banks	Currituck	1	8.4	9,243	1,782	Delete federally (FWS) protected area from and add wetlands to existing CBRS unit
L03	Hatteras Island	Dare	1	0.0	329	135	No change to existing CBRS unit
L03A	Shackleford Banks	Carteret	1	—	—	—	Federally protected (NPS); delete from CBRS
L05	Onslow Beach Complex	Onslow	3	—	—	—	Military (Marine Corps); delete from CBRS
L06	Topsail	Onslow	3	6.9	5,742	902	Add new area to existing CBRS unit
L07	Lea Island Complex	Pender New Hanover	3	5.1	5,839	415	Add wetlands to existing CBRS unit
L08	Wrightsville Beach	New Hanover	7	1.0	567	115	Delete developed segment from CBRS; add wetlands to existing CBRS unit
L09	Masonboro Island	New Hanover	7	9.1	6,651	1,098	Add wetlands to existing CBRS unit
M01	Waites Island Complex	Brunswick	7	2.1	1,370	132	Add wetlands to existing CBRS unit
Total - CBRS as Recommended				32.6	29,741	4,579	
Existing CBRS				54.6	31,913	8,610	
Net Change in CBRS				-22.0	-2,172	-4,031	

^aUNIT ID CODE - State initials (NC) plus a number identify a proposed new unit. An existing unit is identified by the legal code letter (L or M) and number established by Congress in 1982.

^bUNIT NAME - For proposed new units, this is a provisional name based on a prominent local feature. For existing CBRS units, this is the legal name.

^cCONGRESSIONAL DISTRICT - U.S. Congressional District in which unit is located.

^dSHORELINE LENGTH - For existing units with additions or deletions, this length is for the entire unit, as modified.

^eTOTAL AREA - For existing units with additions or deletions, this area is for the entire unit, as modified.

^fFASTLAND AREA - This acreage is a rough estimate of the portion of the total area that is above the mean high tide line (i.e., the non-wetland area). It is a very general representation of the potentially developable land.

^gRECOMMENDATION - A brief explanation of the Department's recommendations to Congress. For more detailed explanations, see the following section. Abbreviations: FWS = Fish and Wildlife Service, NPS = National Park Service, CBRS = Coastal Barrier Resources System.

STATE COMMENT LETTER



1224

State of North Carolina
Department of Natural Resources and Community Development
Division of Coastal Management
512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

David W. Owens
Director

June 24, 1987

Coastal Barriers Study Group
National Park Service
U.S. Department of the Interior
P.O. Box 37127
Washington, D. C. 20013-7127

Dear Sir/Madam:

Thank you for the opportunity to review the latest draft Report to Congress: Coastal Barrier Resources System. We have circulated the report to all affected state agencies. On behalf of Governor James G. Martin we offer the following comments for the State of North Carolina.

On whole we strongly support the Coastal Barrier Resources Act and its implementation. The elimination of federal subsidies for development of presently undeveloped barrier islands has been an important addition to our overall coastal management efforts.

We support the inclusion of associated aquatic habitats and secondary barriers in the system. We believe that "otherwise protected" lands should also be included in the system with the explicit reservation that such inclusion does not in any way affect funding to further the purposes for which the areas are being protected (such as recreation, wildlife, and educational projects). This inclusion should apply to both publicly and privately held lands.

We are concerned about the proposed deletion of undeveloped military lands from the system. Since military activities essential to national security are already exempt from the limitations of the Act, deletion seems unwarranted and unnecessary and is certainly not supported by the very limited analysis provided in the Executive Summary.

PO Box 27687 Raleigh North Carolina 27611-7687 Telephone 919-733-2291

An Equal Opportunity Affirmative Action Employer

Page Two
June 24, 1987

Finally, we are disappointed in the lack of attention given by the report to securing more consistent, cost-effective and environmentally sensitive federal policies on barrier islands. Rather than proposing a new study to develop proposals regarding redevelopment, such proposals should have been included in this report. Further attention to federal policies that affect development timing, location, and intensity on all barrier islands is also warranted but unaddressed. This policy review should address natural hazard areas and environmentally sensitive areas that are on both developed and undeveloped barriers. It should include a serious review of acquisition, investment, regulatory, tax, and educational alternatives and should be done in coordination with not only other federal agencies but state and local governments as well.

Again, thank you for this comment opportunity. Please feel free to call on us for additional information as needed.

Sincerely,

David W. Owens

DWO/cj

OTHER GENERAL COMMENT LETTERS CONCERNING NORTH CAROLINA



1157

North Carolina Department of Cultural Resources

James C. Martin, Governor
Patric Dorsey, Secretary

Division of Archives and History
William S. Price, Jr., Director

June 17, 1987

Coastal Barriers Study Group
Department of the Interior
National Park Service
P. O. Box 37127
Washington, D.C. 20013-7127

Re: Coastal Barrier Resources System: Proposed
Recommendations for Additions to or Deletions
CH 87-E-0000-0804

Dear Sir:

We have received notification from the State Clearinghouse concerning the above project.

As the coastal region develops in North Carolina, vast numbers of archaeological and historic sites are destroyed. In the process, we lose a significant and irreplaceable body of information about our past. The Coastal Barrier System offers an important mechanism for protecting at least a portion of those resources.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106, codified at 36 CFR Part 800, and to Executive Order 11593, "Protection and Enhancement of the Cultural Environment."

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Ms. Renee Gledhill-Earley, Environmental Review Coordinator, at 919/733-4763.

Sincerely,

Renee Gledhill-Earley
David Brook, Deputy State
Historic Preservation Officer

DB:slw

cc: Clearinghouse

109 East Jones Street • Raleigh North Carolina 27611
919/733-7305



610

NORTH CAROLINA COASTAL FEDERATION

Route 5, Box 603 (Ocean) • NEWPORT, NORTH CAROLINA 28570 • 919-393-8185

May 29, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service-498
P.O. Box 37127
Washington, D.C. 20013-7127

Dear Sirs:

These comments respond to the draft to be reported to Congress for modification of the Coastal Barrier Resources System. Our comments and concerns are directed towards the impact of the proposed modifications on the barrier islands in North Carolina.

We oppose the deletion from CBRS of military lands, specifically the Onslow Beach Complex referred to as L05. The proposal of this deletion stems from a conflict between the Departments of Defense and Interior over the funding of an officers club on Onslow Beach. The Defense Department defends this and all of its spending as "essential to national security." Clearly not all defense spending, especially that for entertainment, is essential to national security. "L05" should not be deleted from the CBRS. Criteria for determination of national security should also be clarified.

Much of Bald Head Island in Brunswick County is undeveloped. The undeveloped portions of this island should be included in the CBRS.

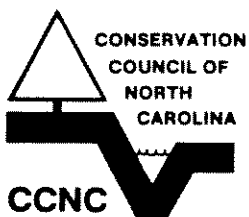
The proposed additions of coastal wetlands will strengthen the CBRS. However, it is unlikely that user fees will ever add up to enough money to pay to buy undeveloped barrier islands. The federal government should act quickly to purchase the few remaining undeveloped barrier islands before they are bulldozed for high density oceanfront condominiums.

The recommended study to develop alternative guidelines concerning redevelopment of coastal barriers following storms or hurricanes has much potential. Timely implementation of this strategy should prove beneficial for the barrier islands.

Thank you for considering these comments and for your concern with wise management of our coastal resources.

Sincerely,

Joseph Causey
Joseph Causey
Research Associate



808

112 Dixie Trail
Raleigh, N. C. 27607
June 8, 1987

Coastal Barriers Study Group
U. S. Department of Interior
National Park Service - 498
Box 37127
Washington, D. C. 20613-7127

Dear Sirs:

I am writing to comment on modifications proposed to the Coastal Barrier Resources Act. I strongly support the proposed addition of all aquatic habitats, including wetlands, associated with coastal barrier islands. Wetlands should be covered by the act.

I support the proposed study of redevelopment of barrier islands after storms or hurricanes. Federal policies should not encourage unsound development after major storms.

I also oppose deletion of military and coast guard lands from the act, particularly L05, the Onslow Beach Complex and the proposed officer's club on the beach.

Thank you for your consideration.

Sincerely,

Bill Holman
Bill Holman, Member of the Board
Conservation Council of N. C.

cc: The Honorable David Price
The Honorable Walter Jones

2410 Brices Creek Road
New Bern, N.C. 28560

806

6 June 1987

Coastal Barriers Study Group
U.S. Department of Interior
National Park Service-498
P.O. Box 37127
Washington, D.C. 20013-7127

Dear Sirs:

Our comments are submitted to reflect our concern for the impact of changes planned for the Coastal Barrier Resources System in North Carolina.

Military lands should not be deleted from CBRS under the guise of "national security". Our military uses that excuse for nearly every petty project it thinks up.

All undeveloped barrier areas should be protected from development to ensure that taxes will not be wasted in disaster relief and similar wasted spending.

Thank you for considering our comments.

Sincerely,

Susan Mays
Roger and Susan Mays

807

Lee Maria Lewis
J-6 Berkshire Manor
Carrboro, N. C. 27510
June 9, 1987

Coastal Barriers Study Group
U. S. Department of the Interior
National Park Service- 498
P. O. Box 37127
Washington, D. C. 20613-7127

Dear Sirs:

I am currently the summer legal intern for the N. C. Chapter of the Sierra Club and am writing to comment on the draft modifications of the Coastal Barrier Resources Act which is to be reported to Congress. My comments and concerns focus on the influence the proposed modifications will have on the barrier islands and associated aquatic habitats in North Carolina.

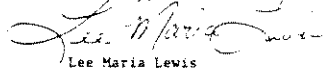
I strongly support the proposed addition of all aquatic habitats associated with the N. C. coastal barriers. This addition will strengthen the CBRS while protecting the fragile balance of this ecosystem. The CBRS could be further strengthened by protecting the scant remainder of undeveloped N. C. barrier islands, such as Bald Head Island and Currituck, from impending coastal development.

The proposed study to generate alternatives for the redevelopment of coastal barriers following storms or hurricanes is greatly needed in N. C. and has excellent growth potential. Noting the significant problems N. C. is experiencing with beach erosion, particularly in Dare, Onslow, and Brunswick counties, prompt enactment of this plan would prove beneficial and would prevent our tax collars from further subsidizing the on-going unsound coastal development.

I oppose the deletion of military and Coast Guard lands from the CBRS, particularly LOS, the Onslow Beach Complex. The proposal arises from a conflict between the Defense Department and the Interior concerning funding for an officer's club on the Onslow Beach Unit. Other military and Coast Guard lands should not fall victim to the proposed deletion and be exempt from CBRS protection due to a localized dispute. The Defense Department defends all of its spending as "essential to national security." It is clear that spending for a clubhouse is not "essential to national security" and the allocation of defense funds should not determine the environmental protection afforded to these military coastal barriers. It would be detrimental to our coastal resources to differentiate between coastal barriers simply on the basis of whether they are owned by the military or by private individuals. Both are subject to equivalent degrees of destruction and thus should be similarly protected.

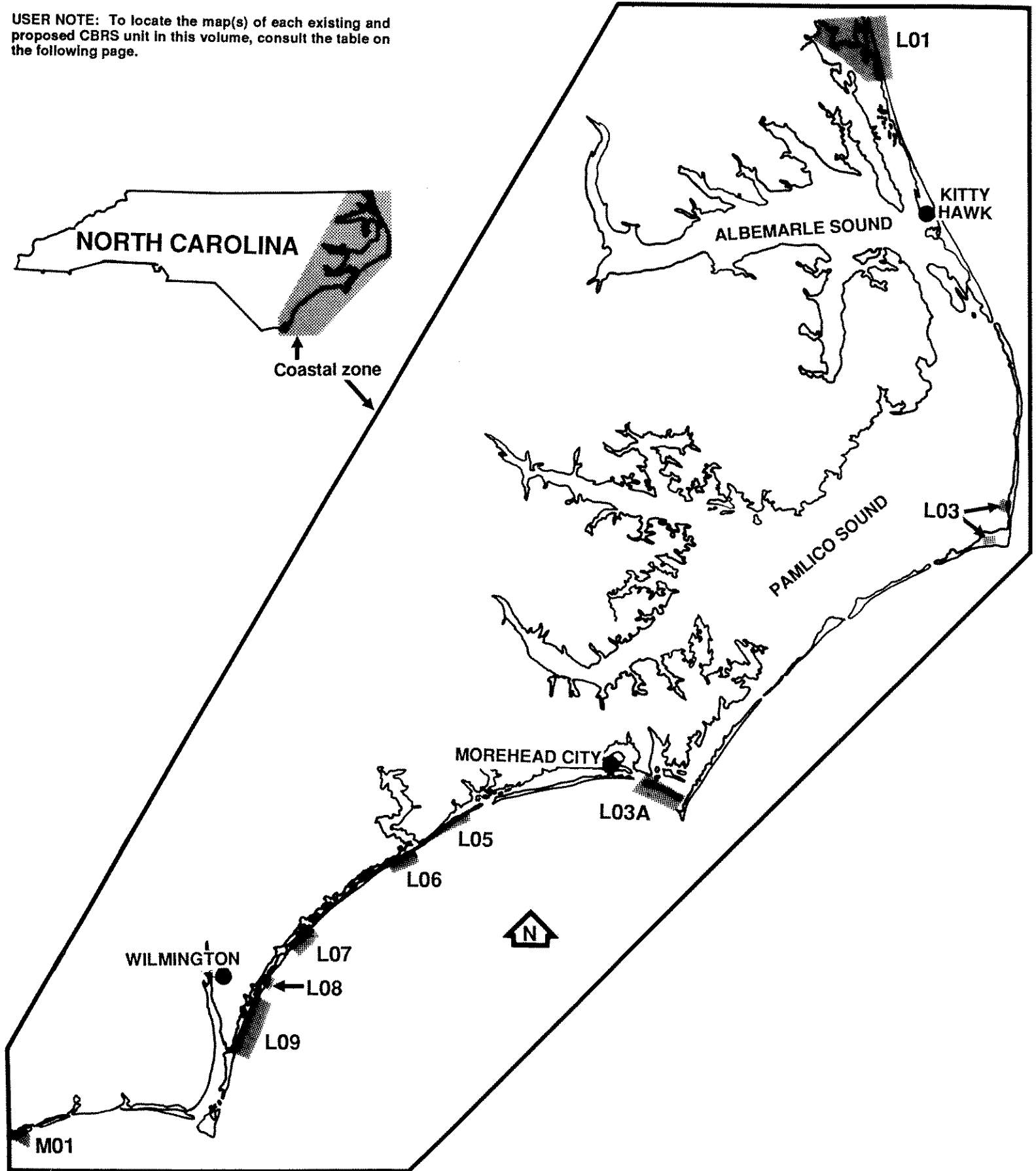
Thank you for considering my local concerns and comments and also for your work to protect the delicate balance of our important coastal resources.

Sincerely,


Lee Maria Lewis

INDEX TO EXISTING AND PROPOSED CBRS UNITS IN NORTH CAROLINA

USER NOTE: To locate the map(s) of each existing and proposed CBRS unit in this volume, consult the table on the following page.



MAPS DEPICTING EXISTING AND PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
L01*	Currituck Banks	Knotts Island	12
		Barco	13
		Corolla	14
L03	Hatteras Island	Buxton	21
L03A	Shackleford Banks	Harkers Island	30
		Cape Lookout	31
		Beaufort	32
L05	Onslow Beach Complex	Browns Inlet	35
		New River Inlet	36
L06	Topsail	New River Inlet	36
		Sneads Ferry	37
		Spicer Bay	38
		Hampstead	39
L07*	Lea Island Complex	Wrightsville Beach	41
L08*	Wrightsville Beach	Wrightsville Beach	41
L09*	Masonboro Island	Wrightsville Beach	41
		Carolina Beach	44
M01*	Waites Island Complex	Little River	48

*Public comment summaries and DOI responses follow unit maps.

MAPS DEPICTING OTHERWISE PROTECTED, MILITARY, AND COAST GUARD LANDS ON UNDEVELOPED COASTAL BARRIERS*

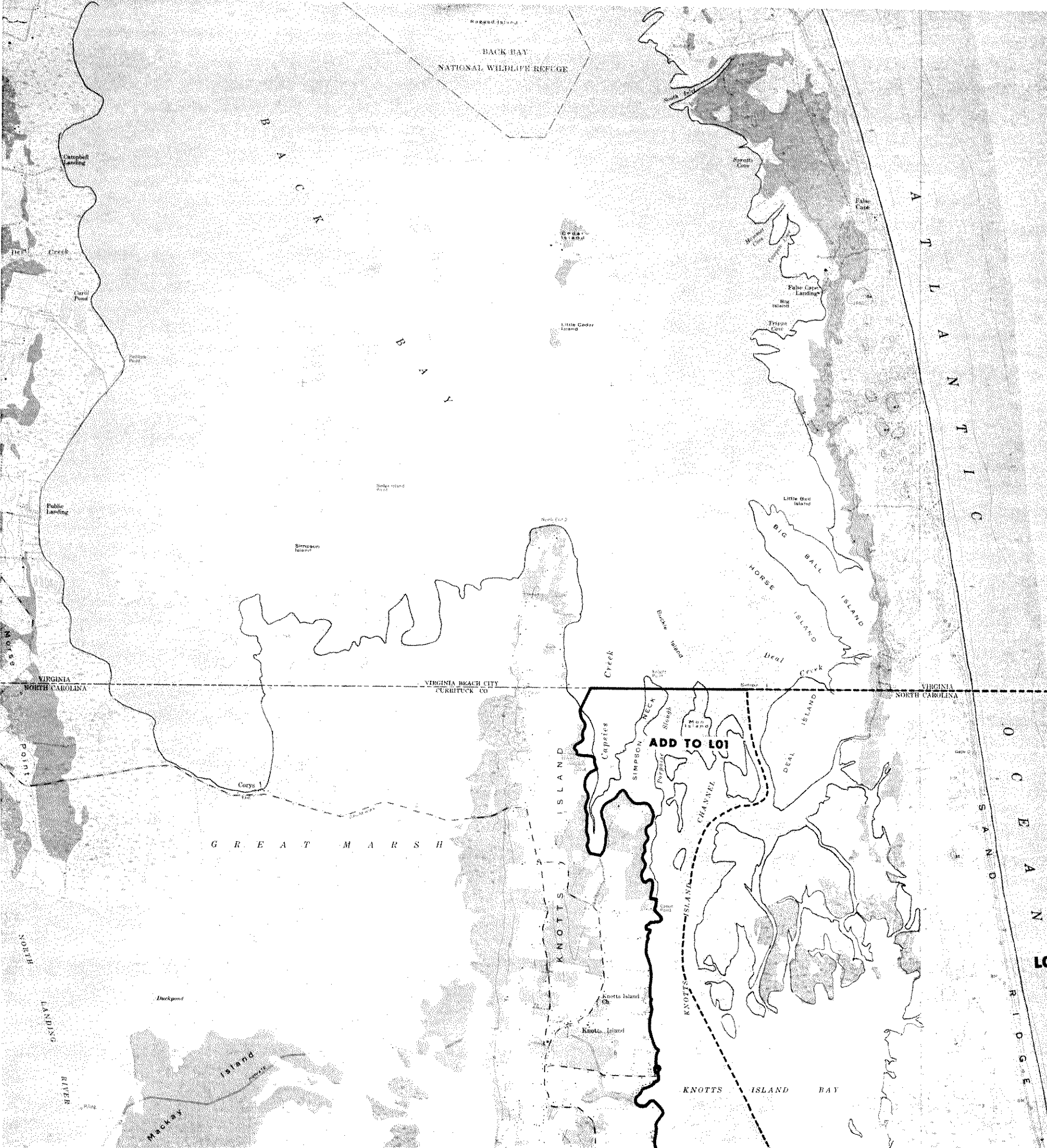
USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Barco	Federal	13
Corolla	Federal	14
Jarvisburg	Private	16
Oregon Inlet	Federal	17
Pea Island	Federal	18
Rodanthe	Federal	19
Little Kinnakeet	Federal	20
Buxton	Federal	21
Hatteras	Federal	22
Green Island	Federal	23
Ocracoke	Federal	24
Portsmouth	Federal	25
Wainwright Island	Federal	26
Styron Bay	Federal	27
Davis	Federal	28
Horsepen Point	Federal	29
Harkers Island	Federal	30
Cape Lookout	Federal	31
Beaufort	Federal, State, Coast Guard	32
Mansfield	State	33
Swansboro	State	34
Browns Inlet	State, Military	35
New River Inlet	Military	36
Kure Beach	State	47

*These maps are provided for information purposes only. DOI is not recommending the addition of these areas to the CBRS unless they are made available for development that is inconsistent with the CBRA purposes.

MAP KEY

-----	Existing CBRS units
_____	Recommended additions to or deletions from the CBRS
.....	Military, Coast Guard, or otherwise protected, undeveloped coastal barrier
ADD	Area recommended for addition to the CBRS
DELETE	Area recommended for deletion from the CBRS
EXCLUDED	Area excluded from an existing or proposed CBRS unit because it is developed
FEDERAL	Federally protected, undeveloped coastal barrier; for information only
STATE	State protected, undeveloped coastal barrier; for information only
LOCAL	Locally protected, undeveloped coastal barrier; for information only
PRIVATE	Privately protected, undeveloped coastal barrier; for information only
MILITARY	Undeveloped coastal barrier owned by the military; for information only
COAST GUARD	Undeveloped coastal barrier owned by the Coast Guard; for information only

Maps are arranged in geographic order from north to south.



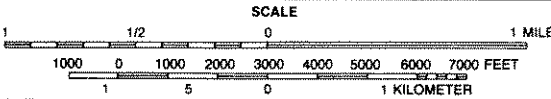
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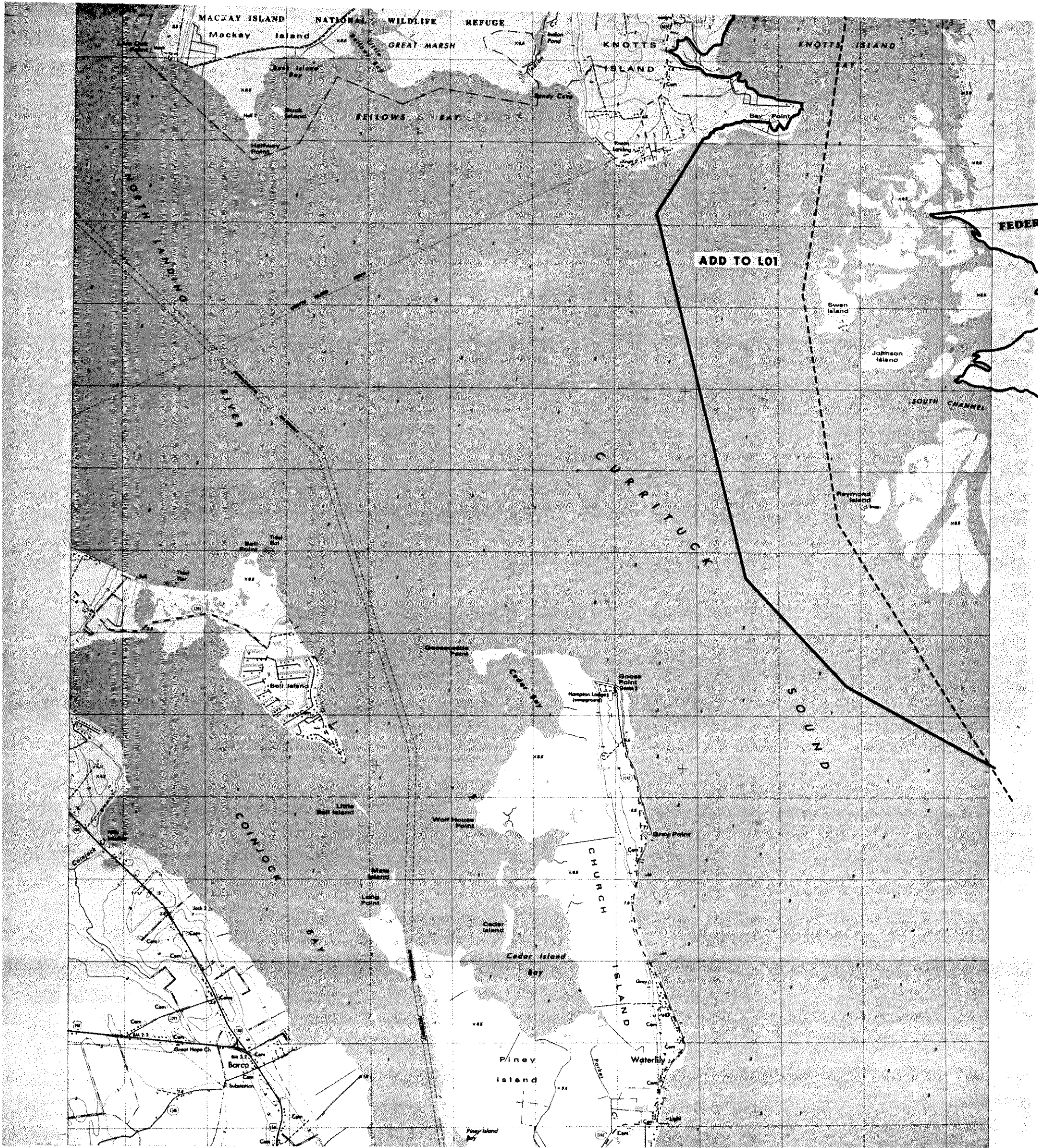
QUADRANGLE
KNOTTS ISLAND
NORTH CAROLINA



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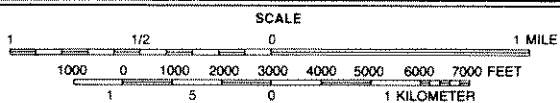
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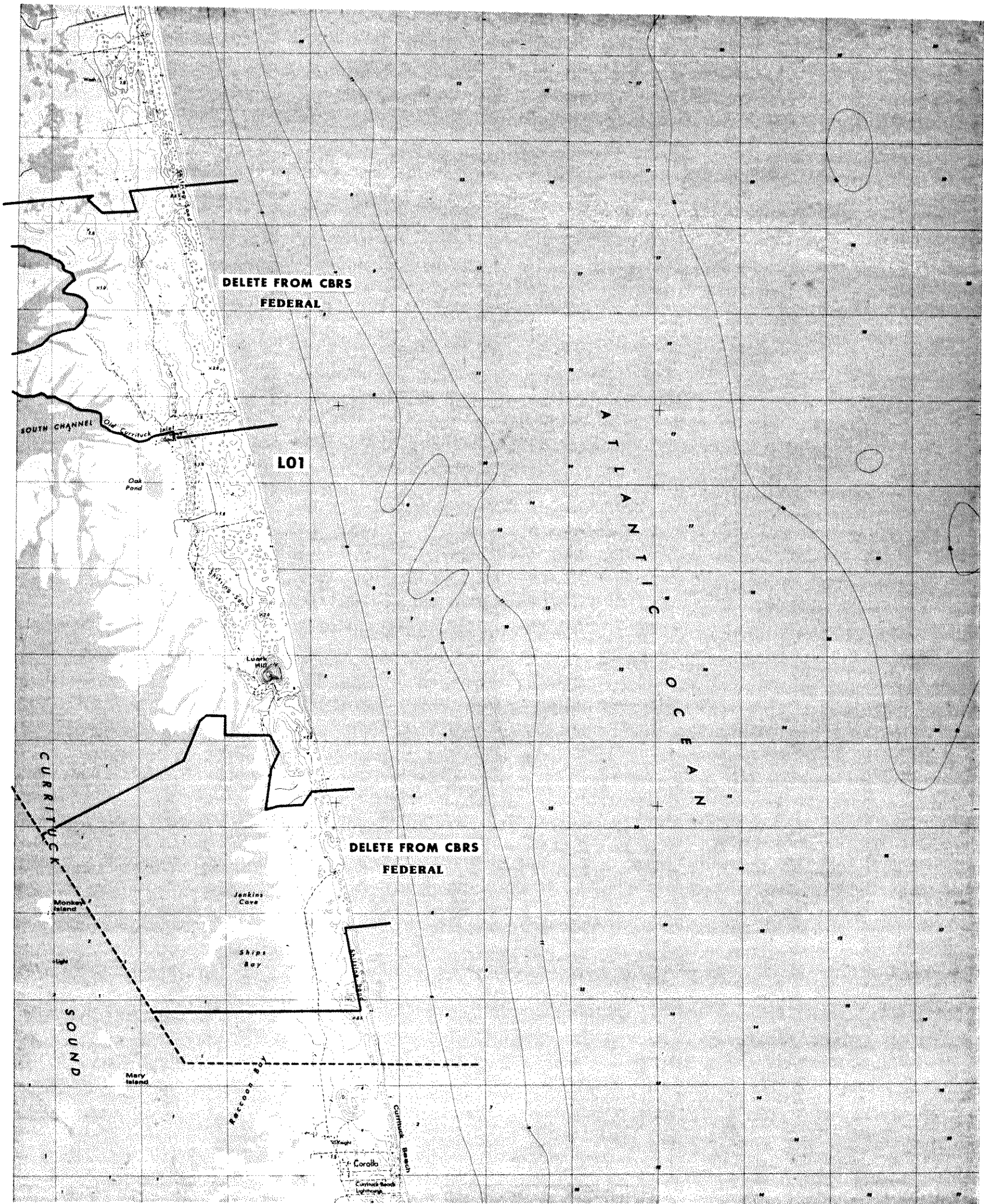


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QUADRANGLE
BARCO
NORTH CAROLINA



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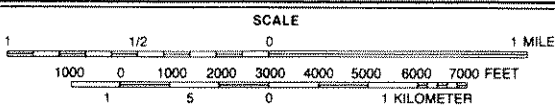
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QUADRANGLE
COROLLA
NORTH CAROLINA



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L01 - CURRITUCK BANKS

State Position: The State of North Carolina supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: A resolution from the Currituck County Board of Commissioners opposing any expansion of the CBRS in the County was received. It is reprinted below.

Response: The additions to L01 recommended by the DOI are all fully qualified associated aquatic habitat.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to L01. The DOI also recommends deleting that portion of the existing unit that is federally protected (Currituck National Wildlife Refuge) from the CBRS.



COUNTY OF CURRITUCK
RESOLUTION AGAINST THE FEDERAL GOVERNMENT ACQUIRING
PROPERTY IN CURRITUCK COUNTY

WHEREAS, the U. S. Department of Interior plans to place an additional nine thousand acres of land located in Currituck County in the National Coastal Barrier Resources System; and

WHEREAS, the U. S. Department of Interior at the present time has approximately eight thousand two hundred sixty acres of land in Currituck County under its protection in the National Coastal Barrier Resources System; and

WHEREAS, the Currituck County Board of Commissioners have been requested by many citizens of Currituck County to take action where possible to prevent further acquisition of Currituck County lands by the U. S. Department of Interior;

NOW, THEREFORE, be it resolved by the Currituck County Board of Commissioners that:

1. The Currituck County Board of Commissioners strongly oppose any further acquisition of Currituck County lands by the U. S. Department of Interior.

2. That a copy of this resolution be forwarded to North Carolina Governor James Martin, North Carolina Lieutenant Governor Robert Jordan, North Carolina Senator Marc Basnight, North Carolina Representative Vernon James, North Carolina Representative R.M. Pete Thompson, United States Senator Jesse Helms, United States Senator Terry Sanford and United States Congressman Walter Jones.

CERTIFICATE

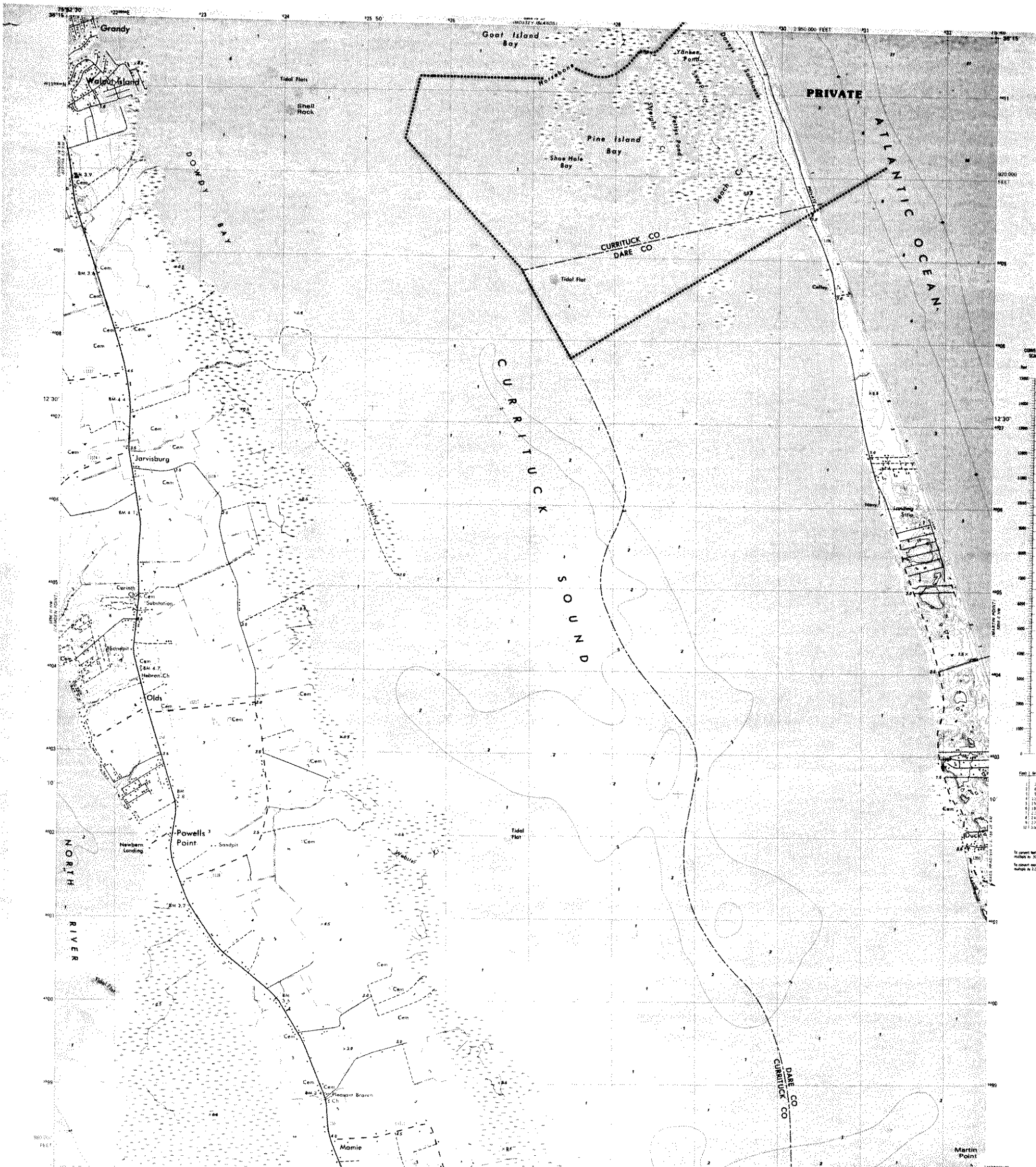
The foregoing Resolution was duly adopted by the Board of Commissioners of the County of Currituck at a meeting on the 5th day of October, 1987.

WITNESS my hand and official seal this 5th day of October, 1987.

ATTEST:


Ronald L. Matthews, Sr.
Clerk to the Board


Frances F. Walker
Chairman, Board of
County Commissioners



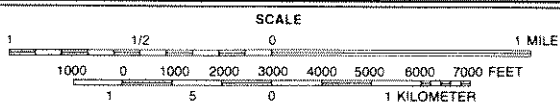
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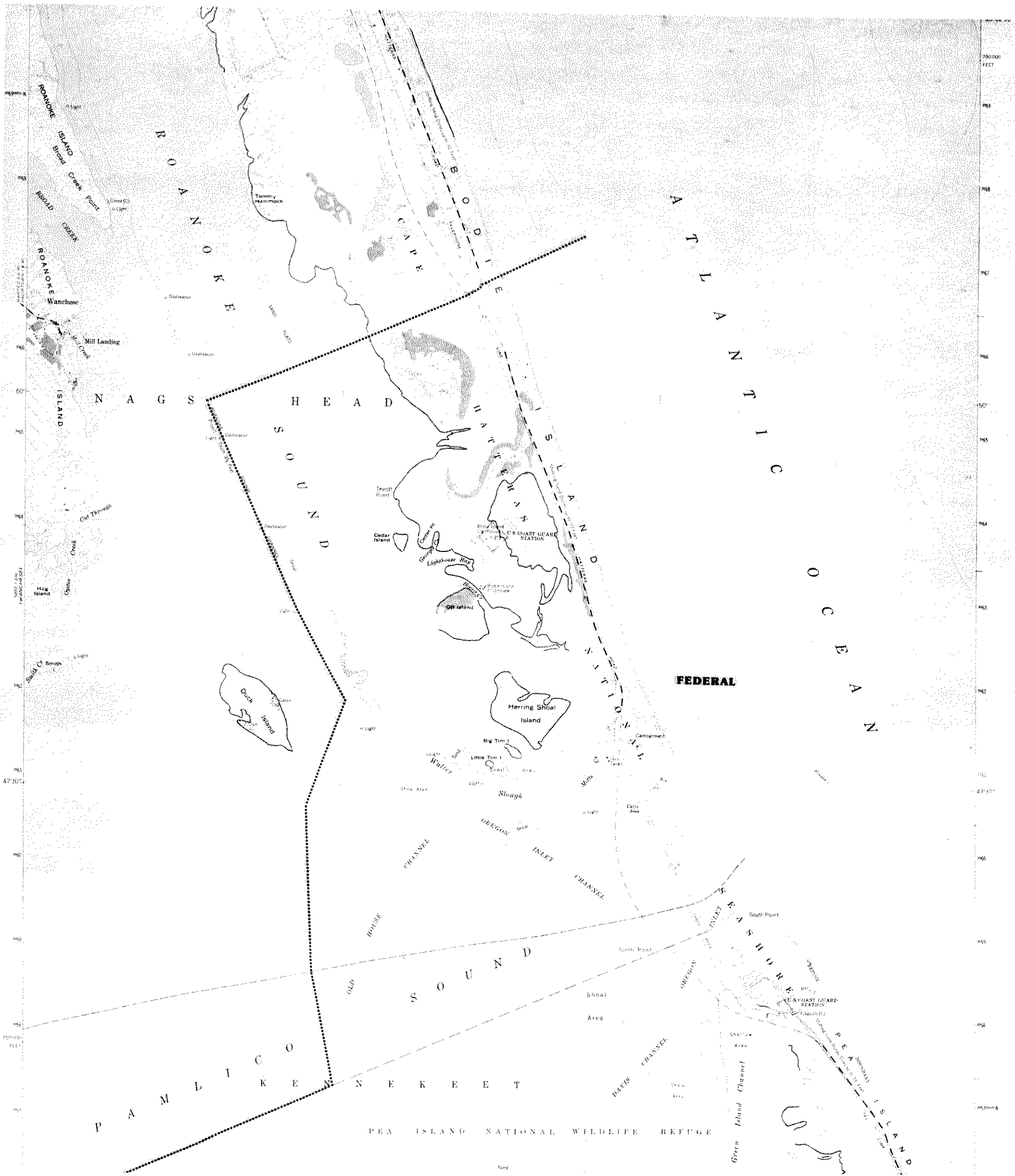
QUADRANGLE
JARVISBURG
NORTH CAROLINA



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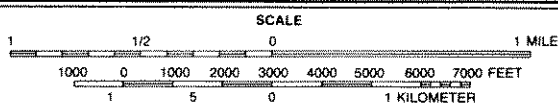
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QUADRANGLE
OREGON INLET
NORTH CAROLINA



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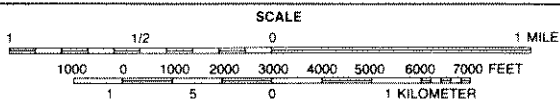
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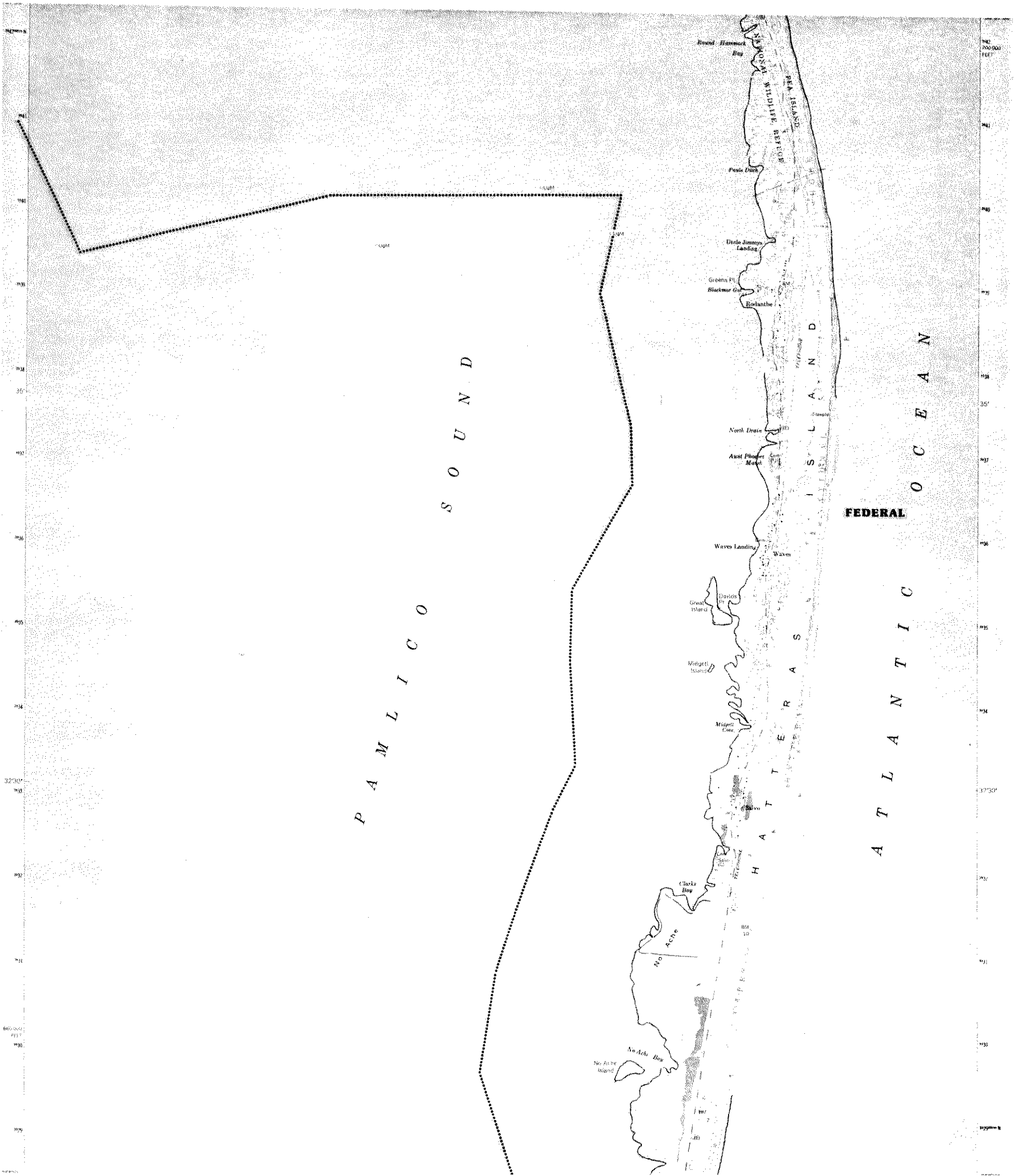


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QUADRANGLE
PEA ISLAND
NORTH CAROLINA



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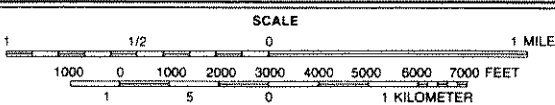
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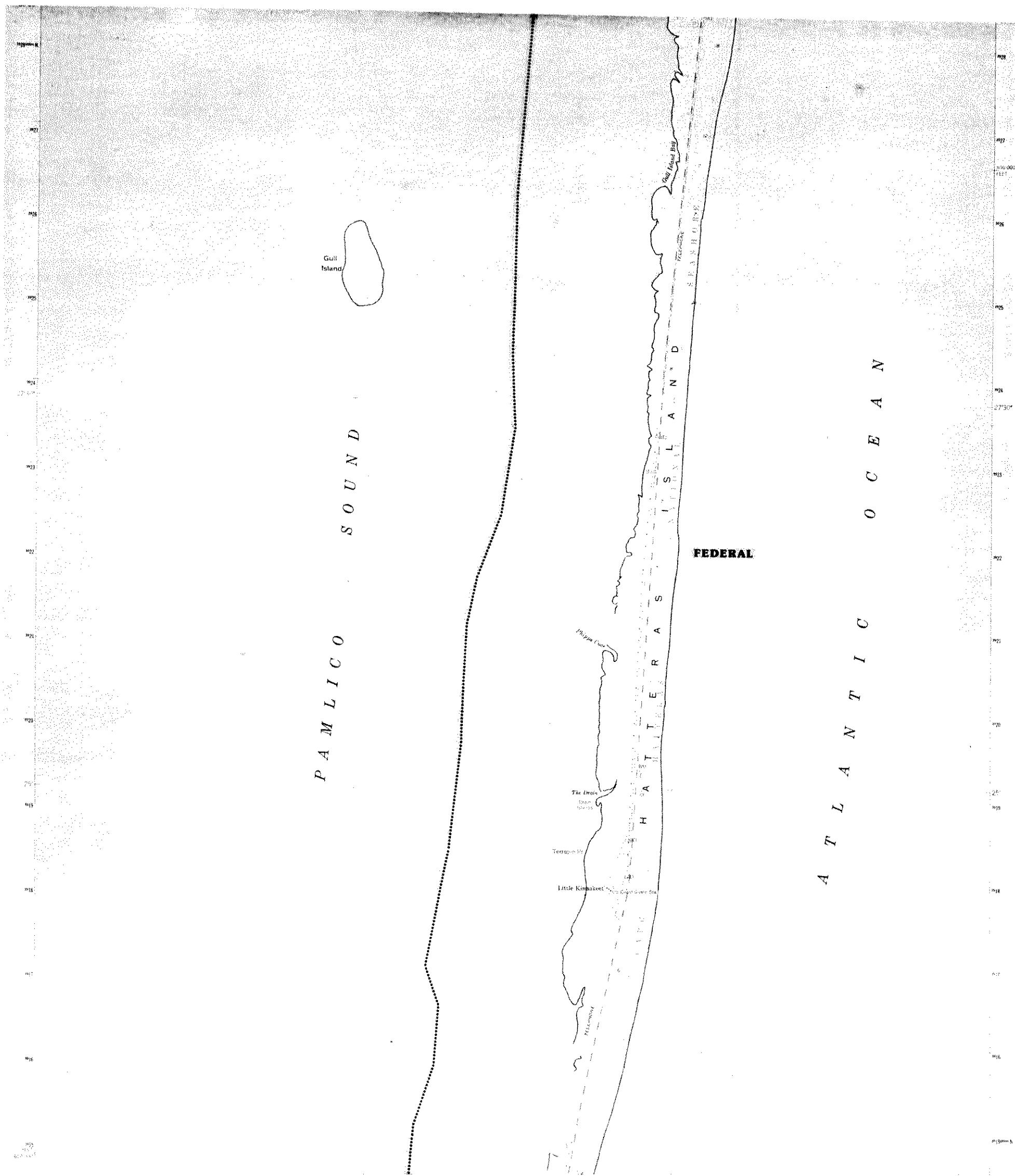
QUADRANGLE
RODANTHE
NORTH CAROLINA



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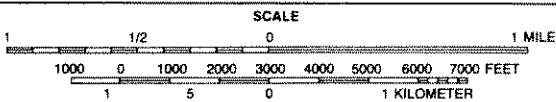
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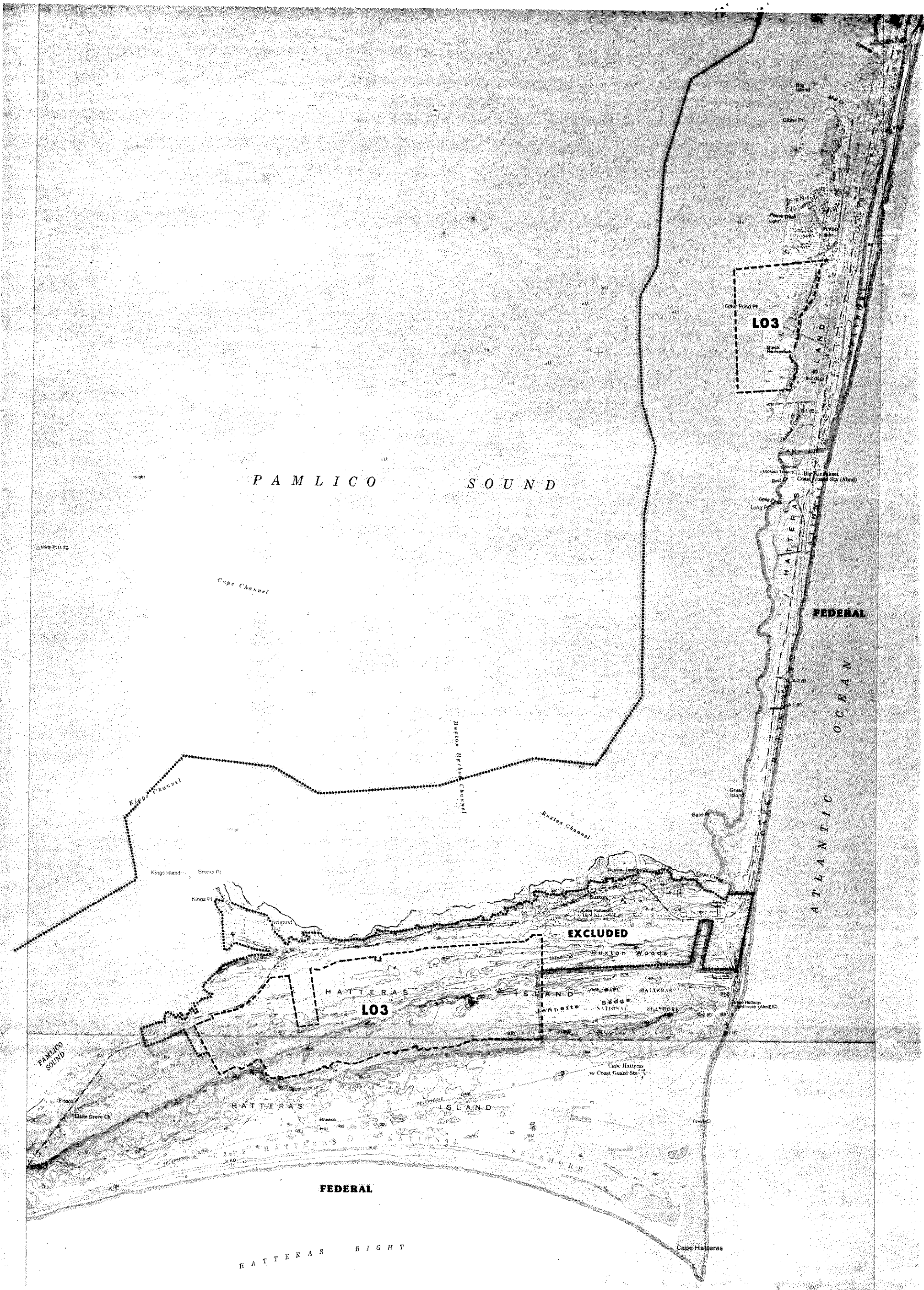
QUADRANGLE
LITTLE KINNAKEET
NORTH CAROLINA



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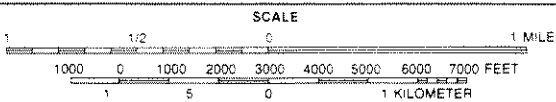
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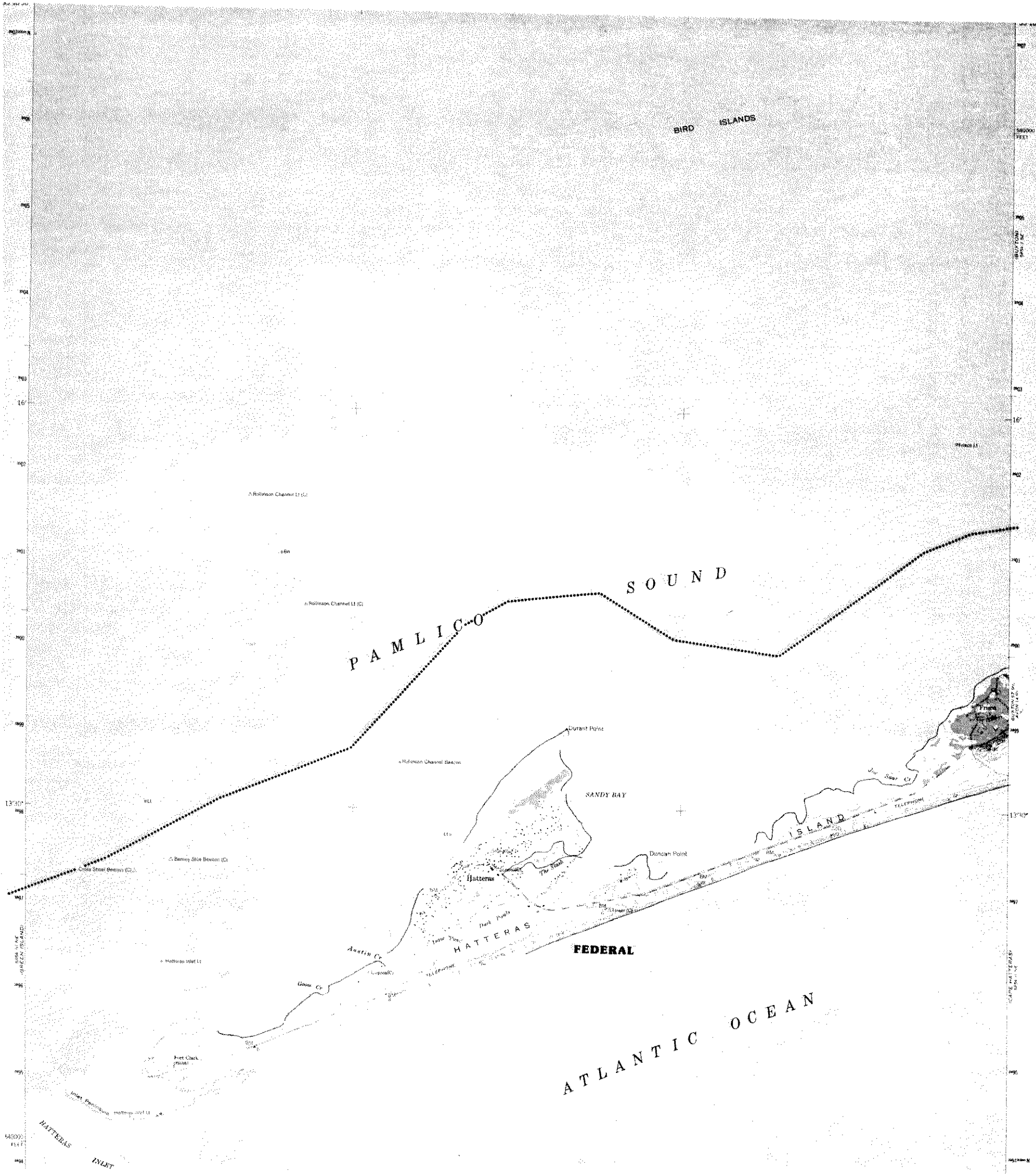
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QUADRANGLE
BUXTON
NORTH CAROLINA



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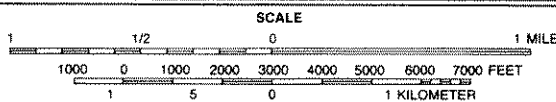
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QUADRANGLE
HATTERAS
NORTH CAROLINA



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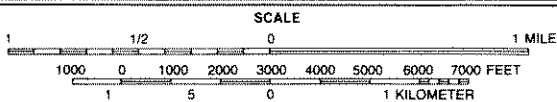
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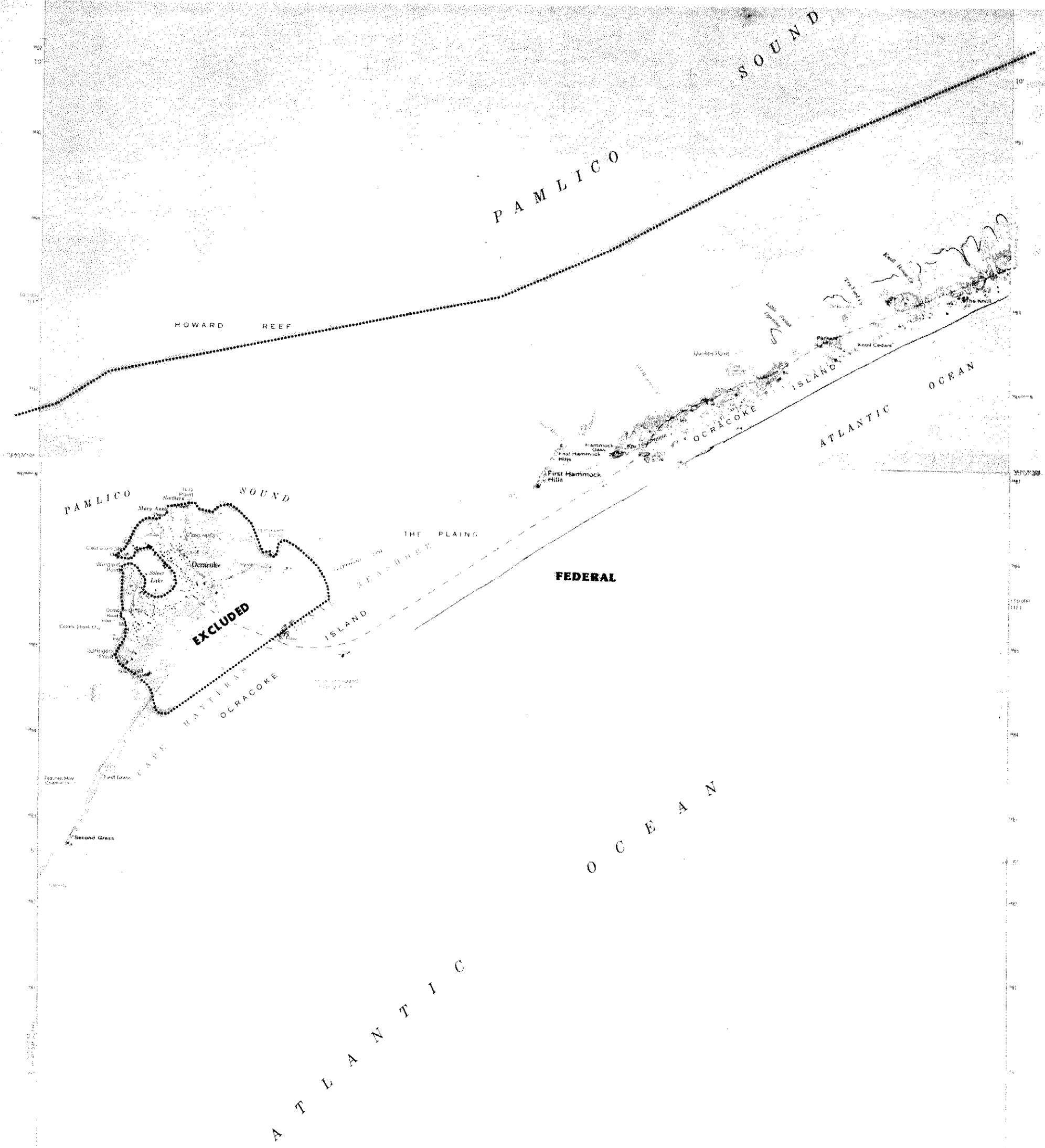
QUADRANGLE
GREEN ISLAND
NORTH CAROLINA



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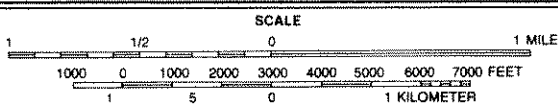
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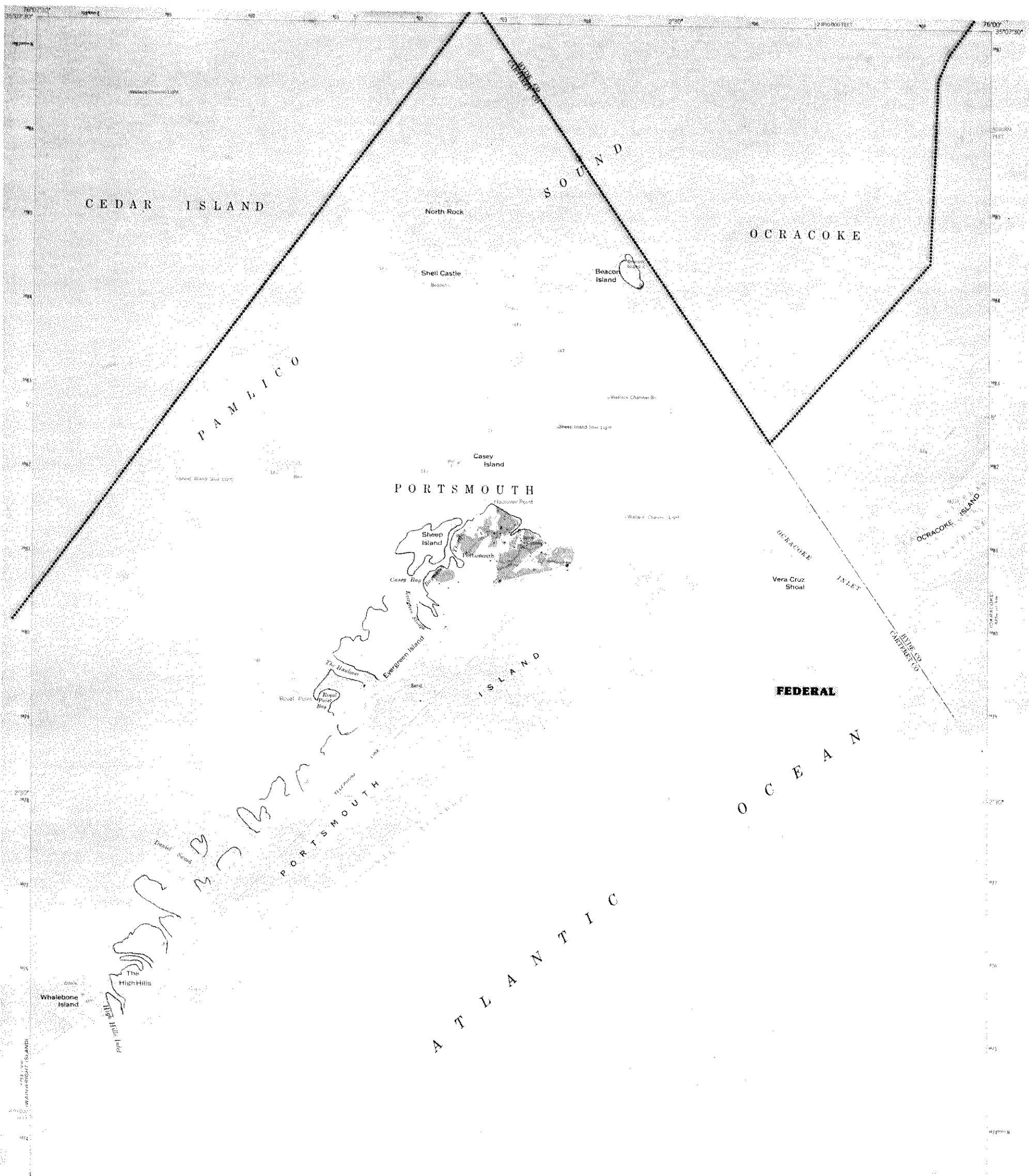
QUADRANGLE
OCRACOKE
NORTH CAROLINA



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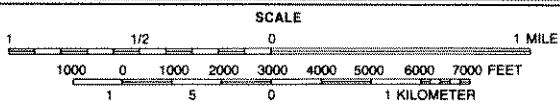
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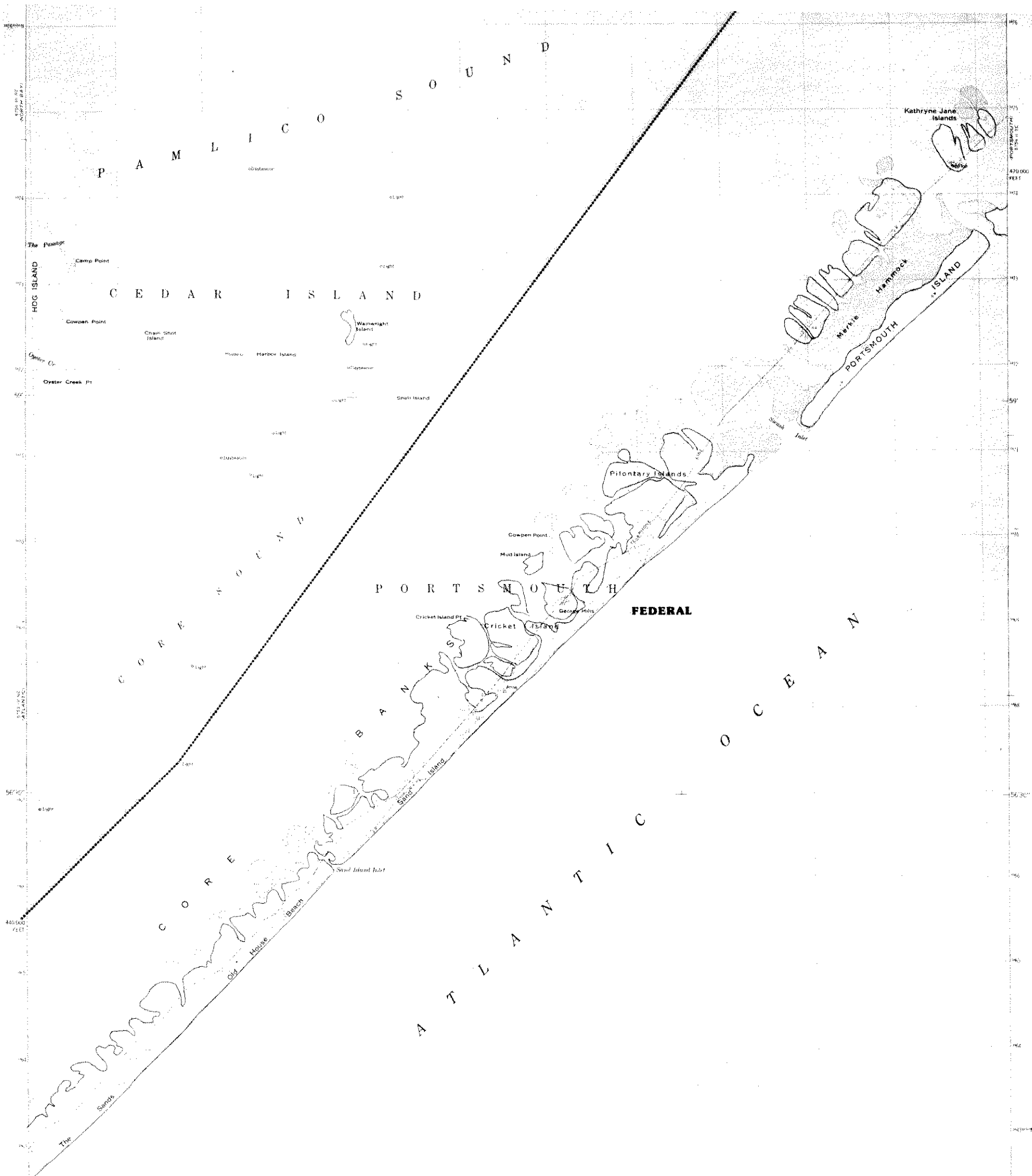
QUADRANGLE
PORTSMOUTH
NORTH CAROLINA



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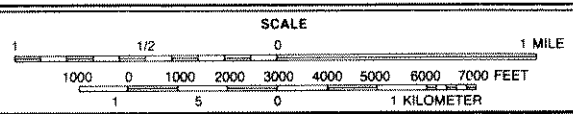
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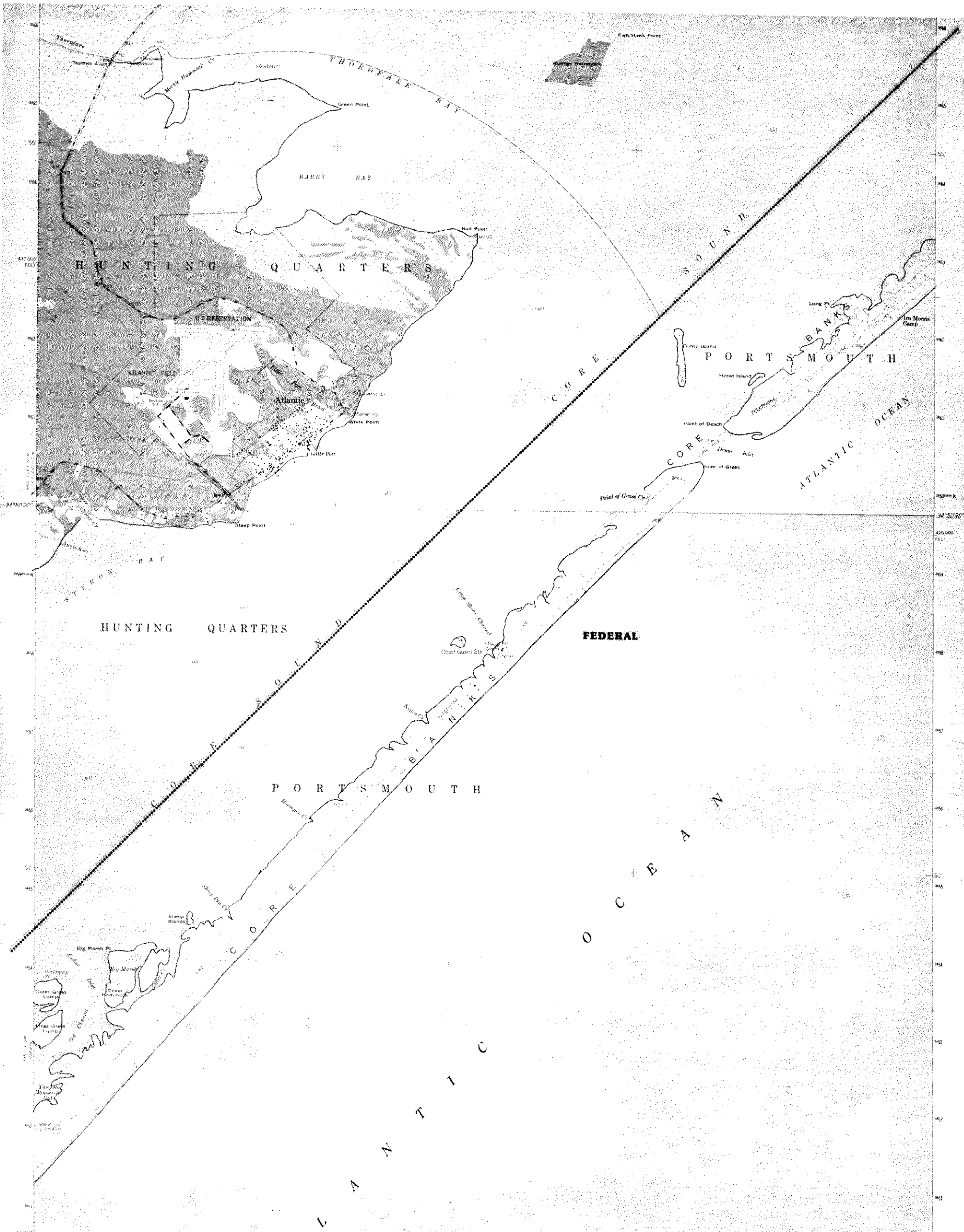
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WAINWRIGHT ISLAND
NORTH CAROLINA



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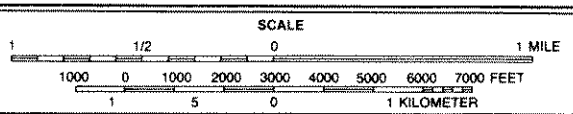
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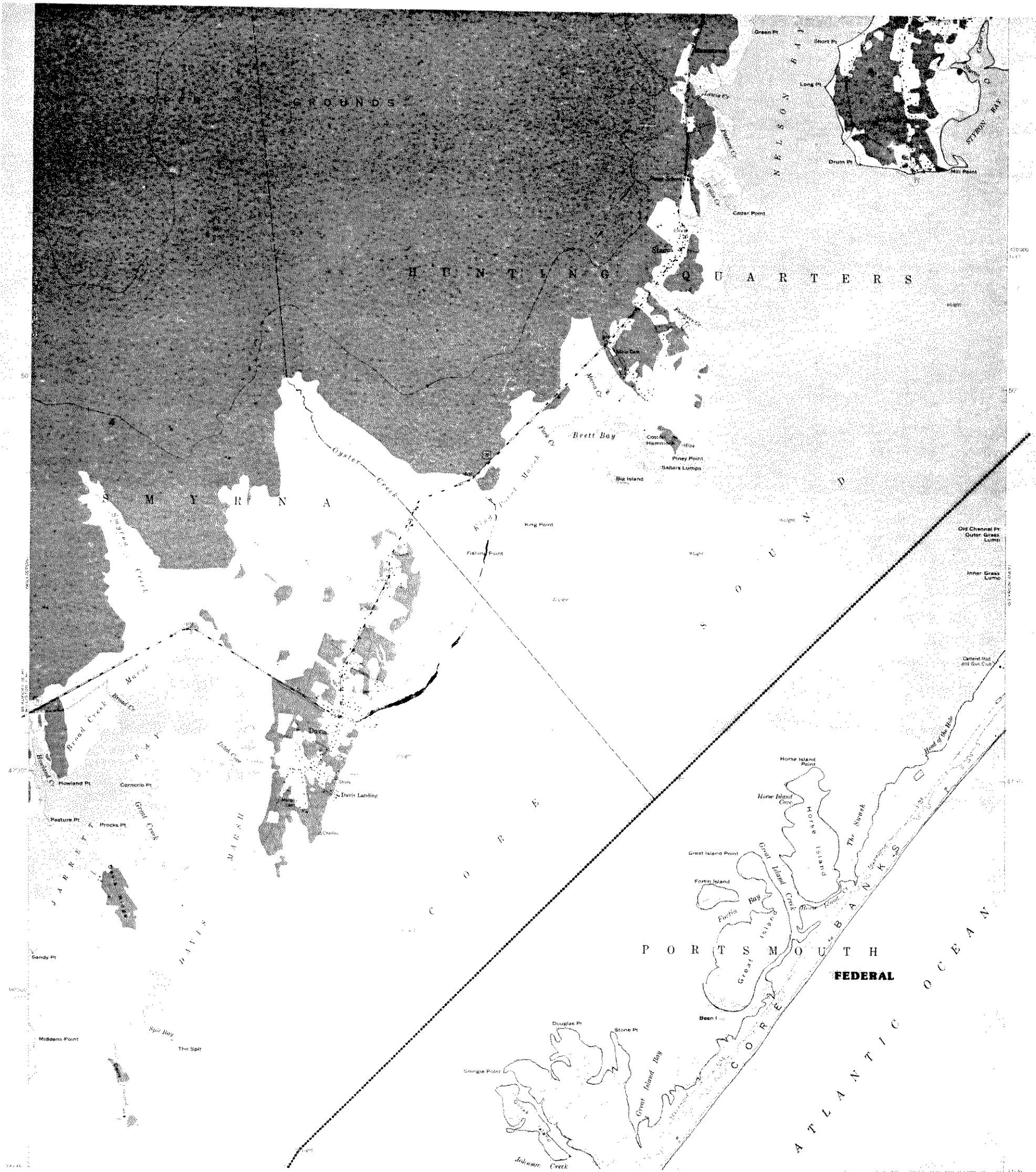
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QUADRANGLE
STYRON BAY
NORTH CAROLINA



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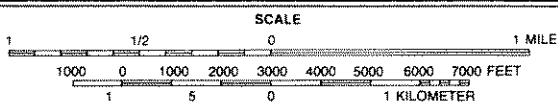
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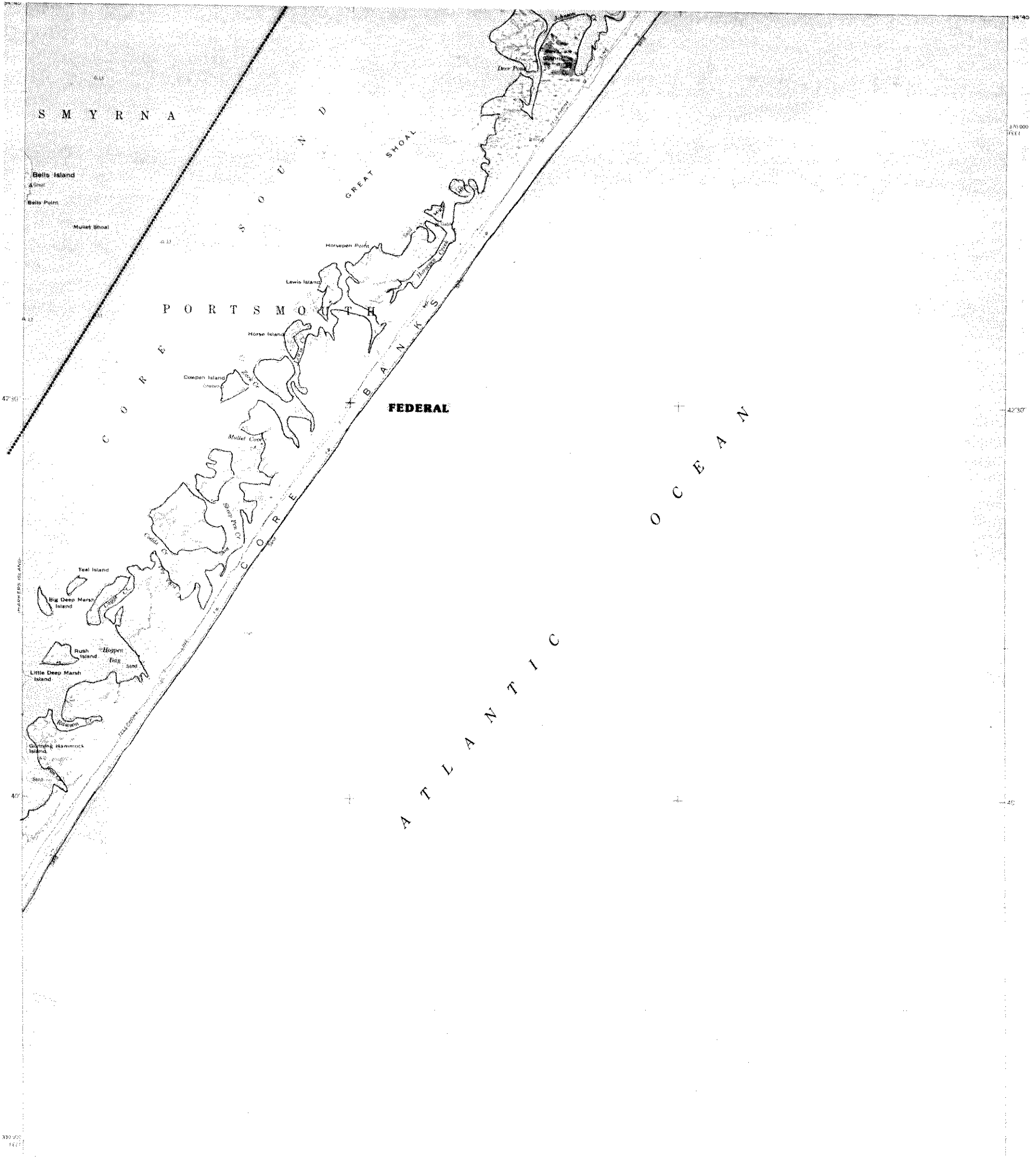
QUADRANGLE
DAVIS
NORTH CAROLINA



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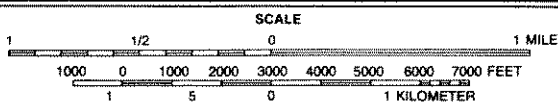
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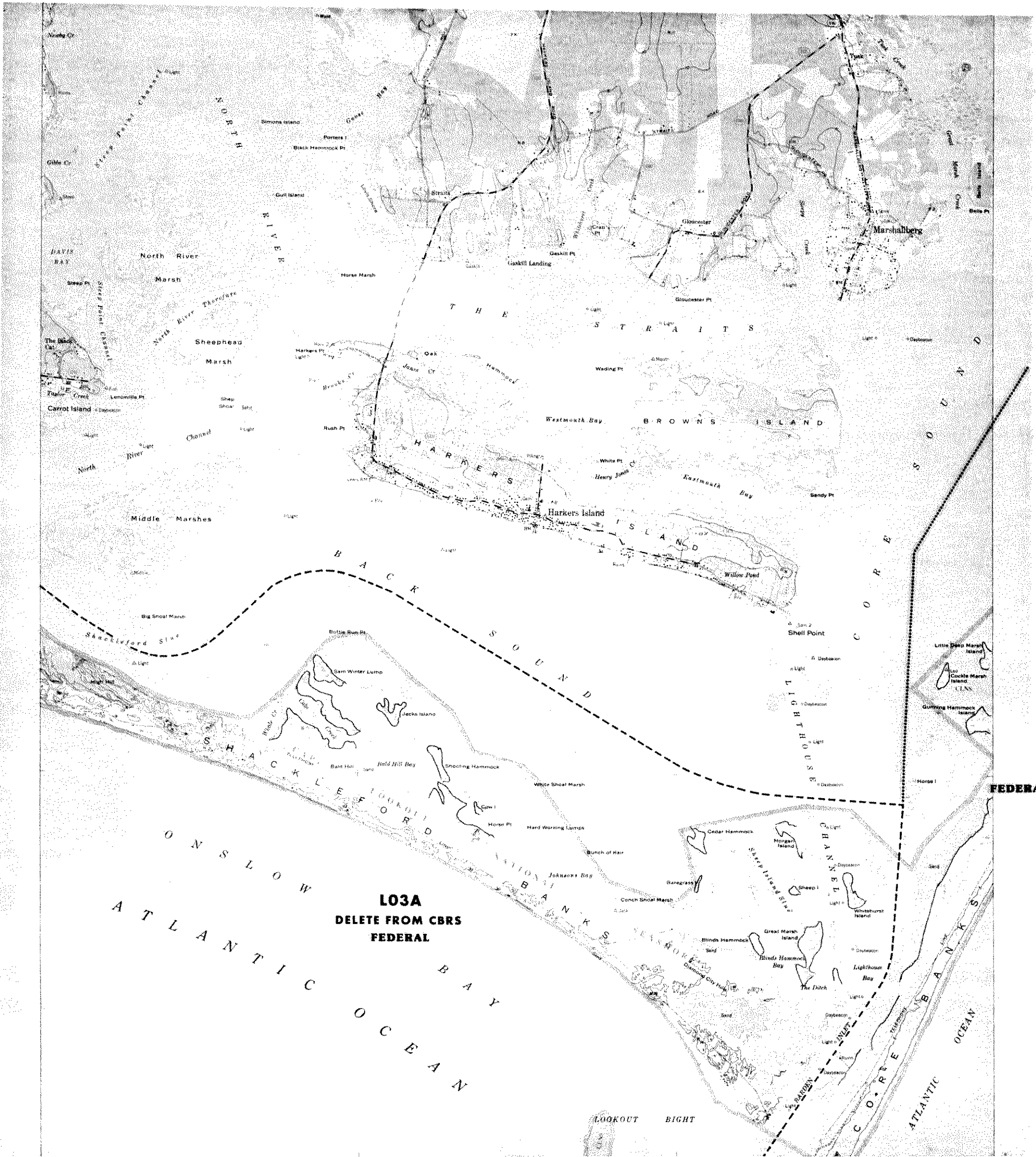


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QUADRANGLE
HORSEPEN POINT
NORTH CAROLINA



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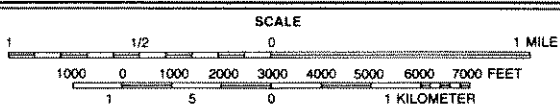
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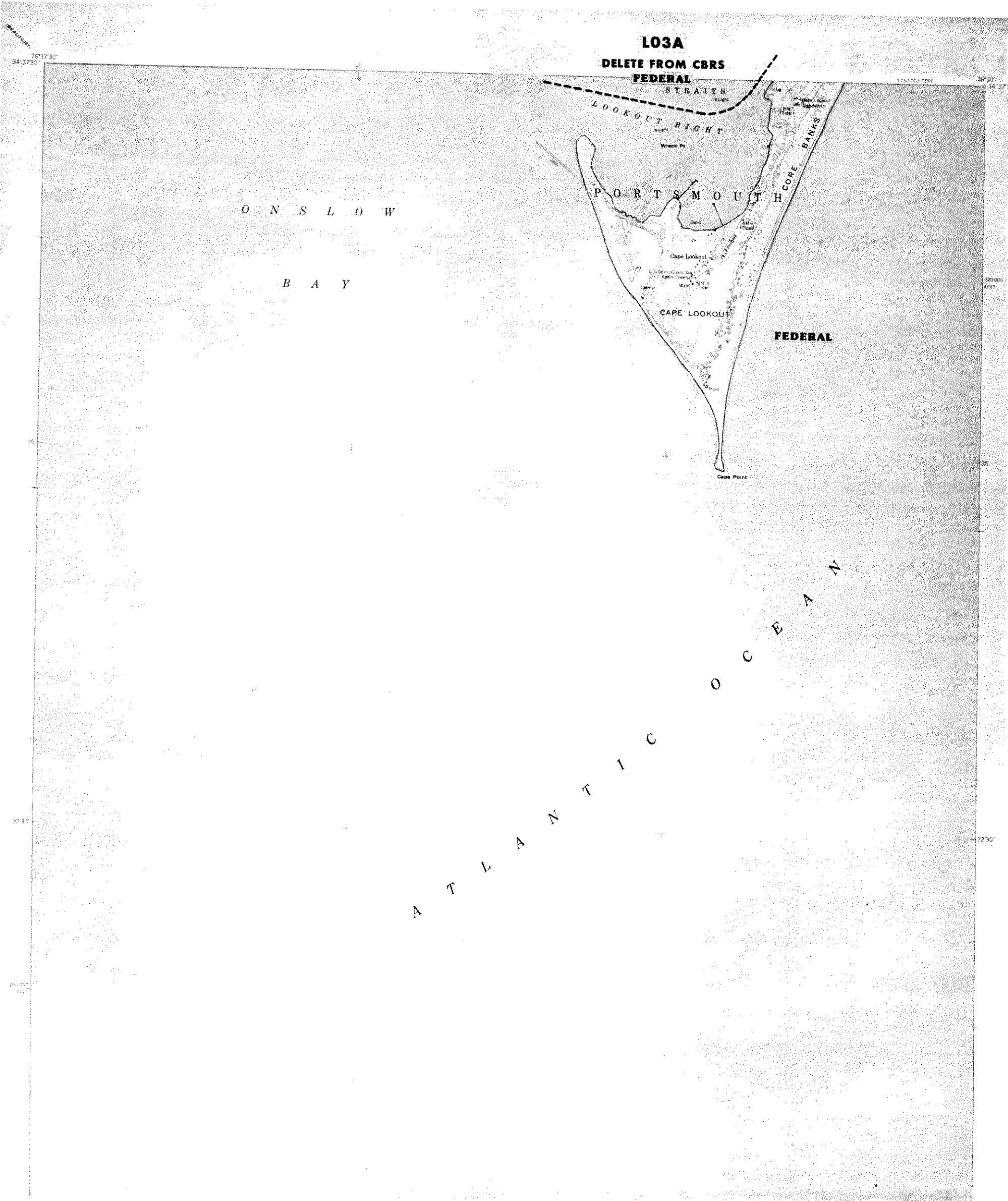
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HARKERS ISLAND
NORTH CAROLINA



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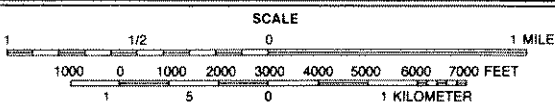
UNITED STATES
 DEPARTMENT OF THE INTERIOR



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 by the Coastal Barriers Study Group
 U.S. Department of the Interior
 Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

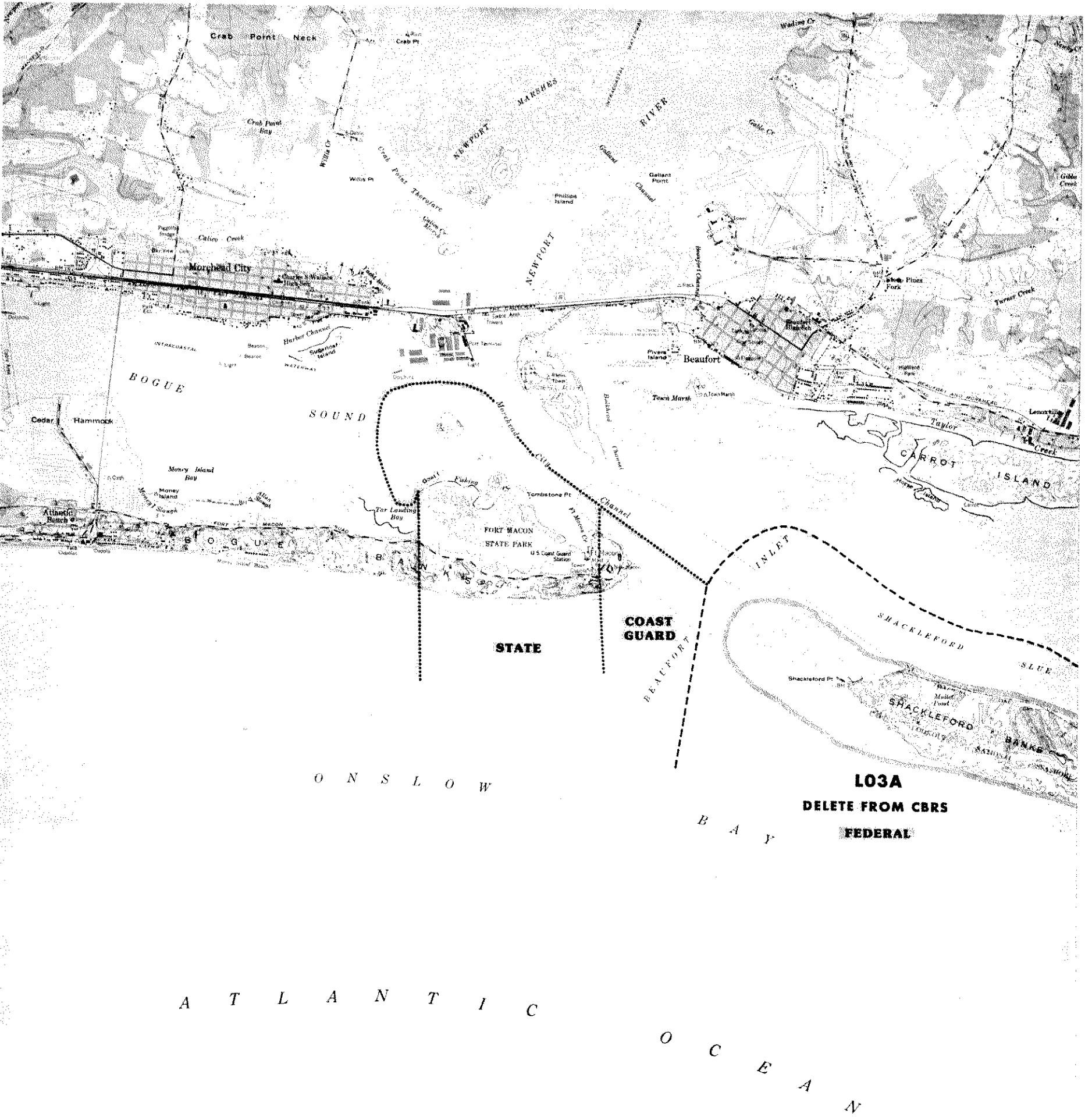
QUADRANGLE
CAPE LOOKOUT
 NORTH CAROLINA



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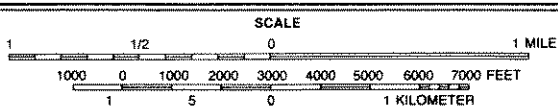
Report to Congress on the Coastal Barrier Resources System

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DEPARTMENT OF THE INTERIOR**



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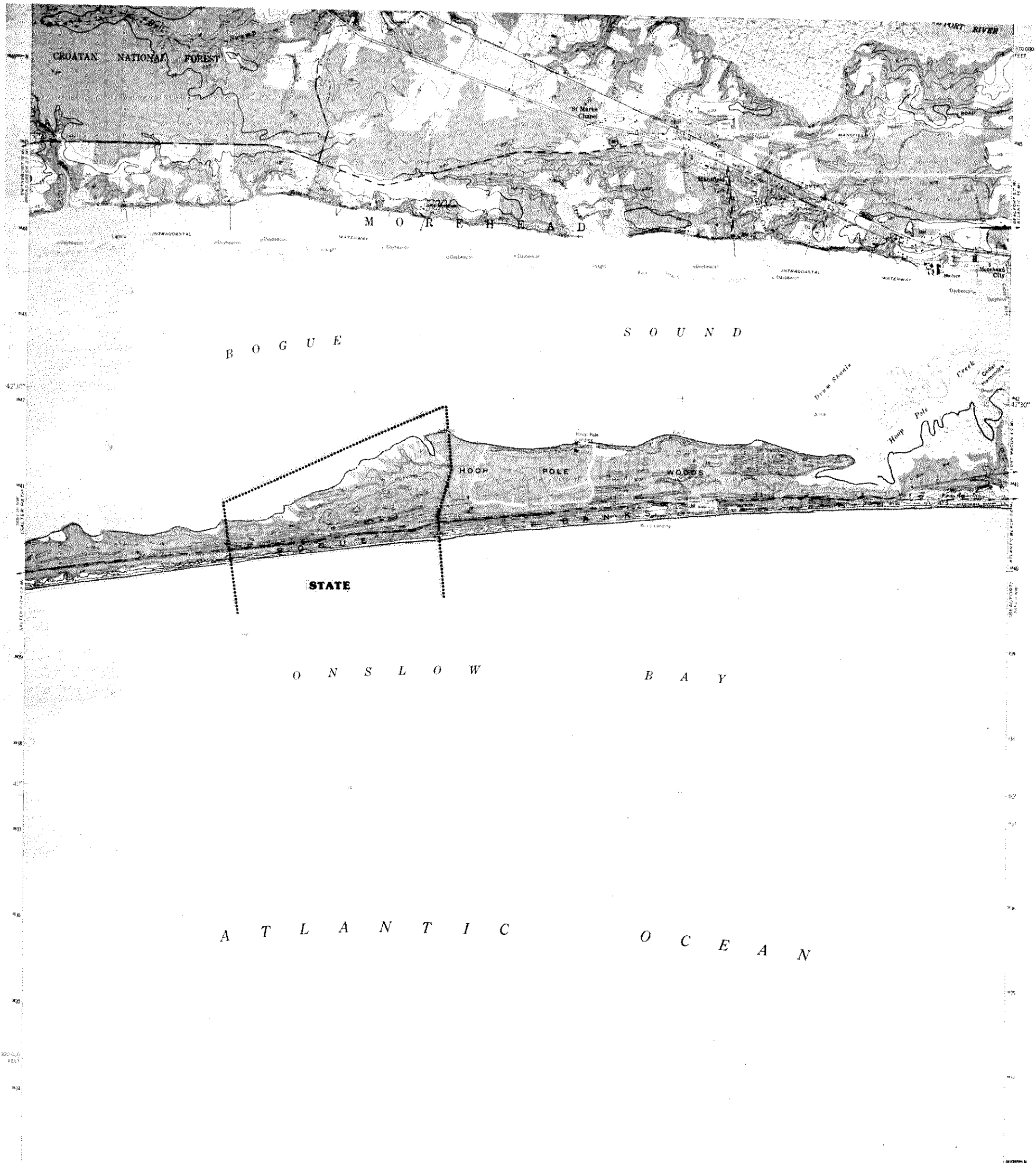
QUADRANGLE
BEAUFORT
NORTH CAROLINA



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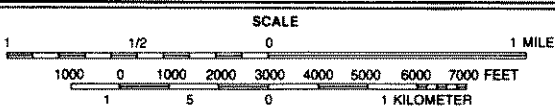
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QUADRANGLE
MANSFIELD
NORTH CAROLINA



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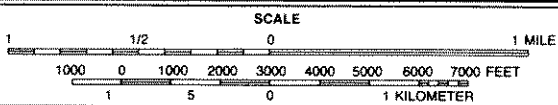
Report to Congress on the Coastal Barrier Resources System

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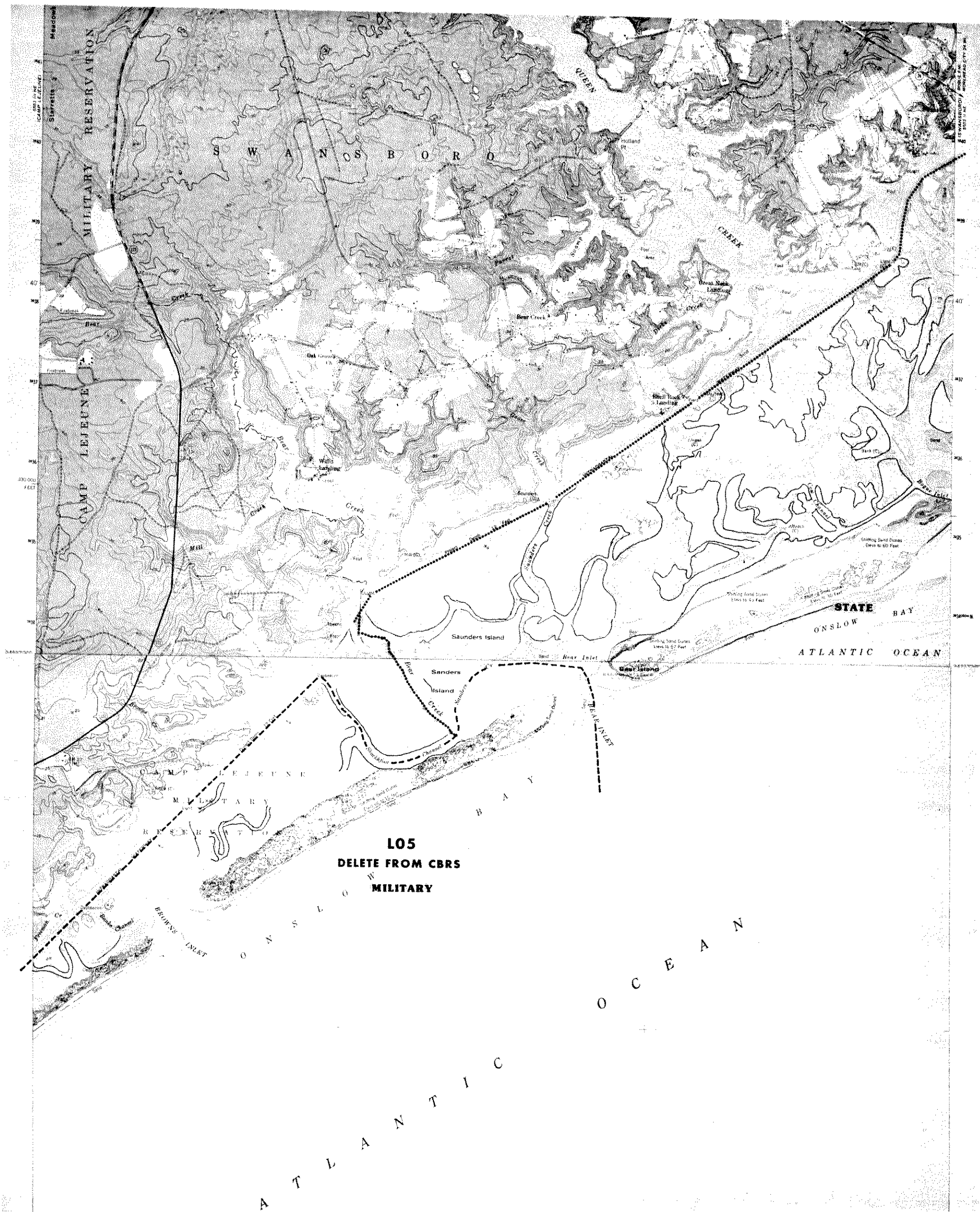
QUADRANGLE
SWANSBORO
NORTH CAROLINA



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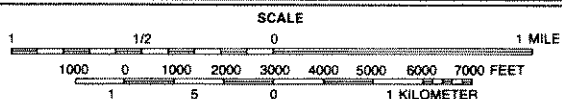
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



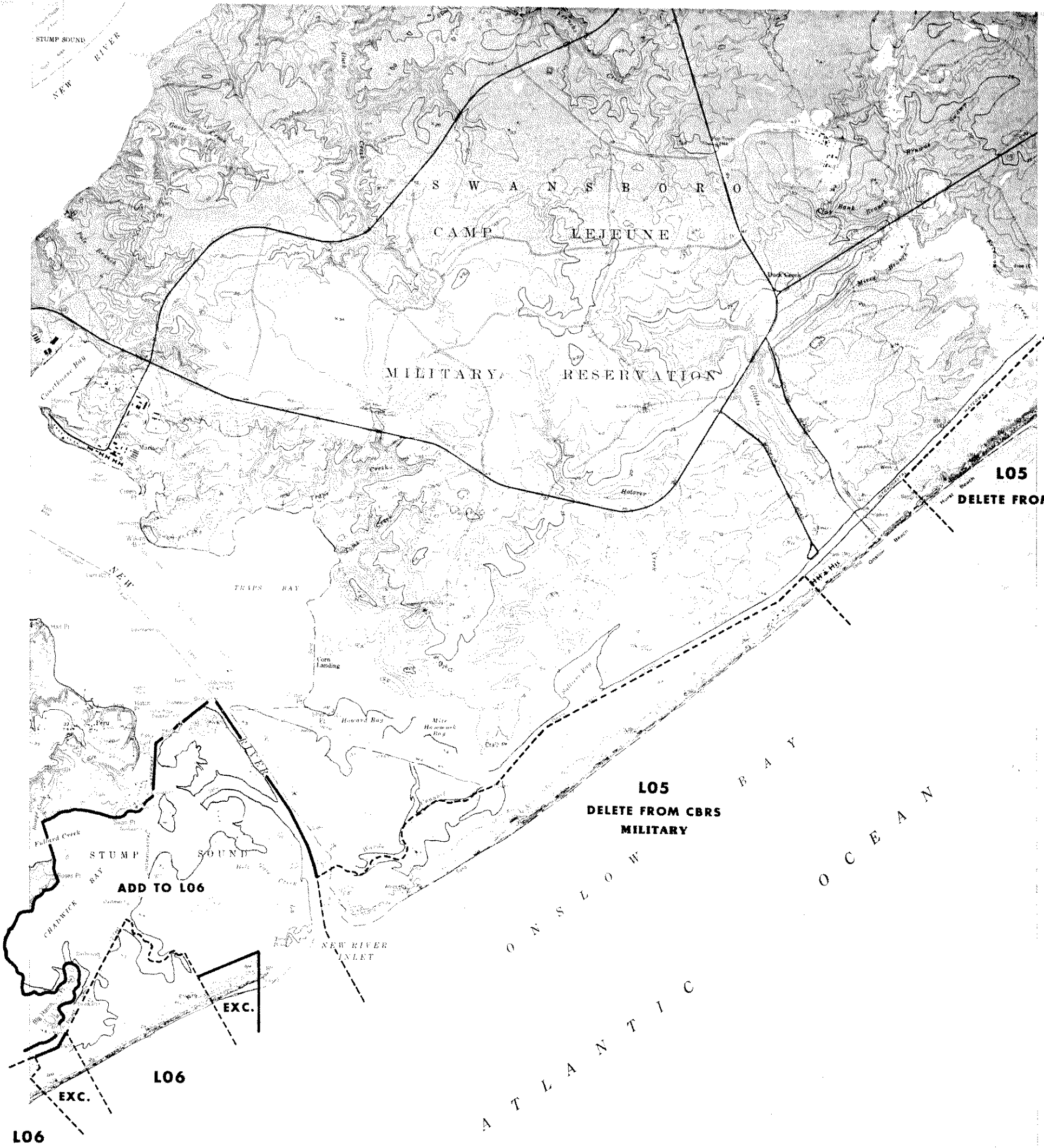
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QUADRANGLE
BROWNS INLET
NORTH CAROLINA



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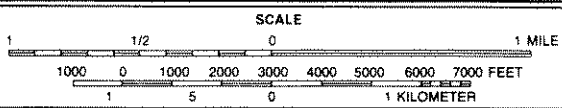
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



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QUADRANGLE
NEW RIVER INLET
NORTH CAROLINA



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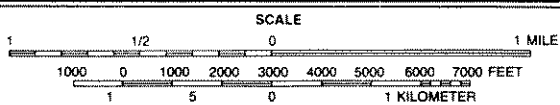
UNITED STATES
DEPARTMENT OF THE INTERIOR



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Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

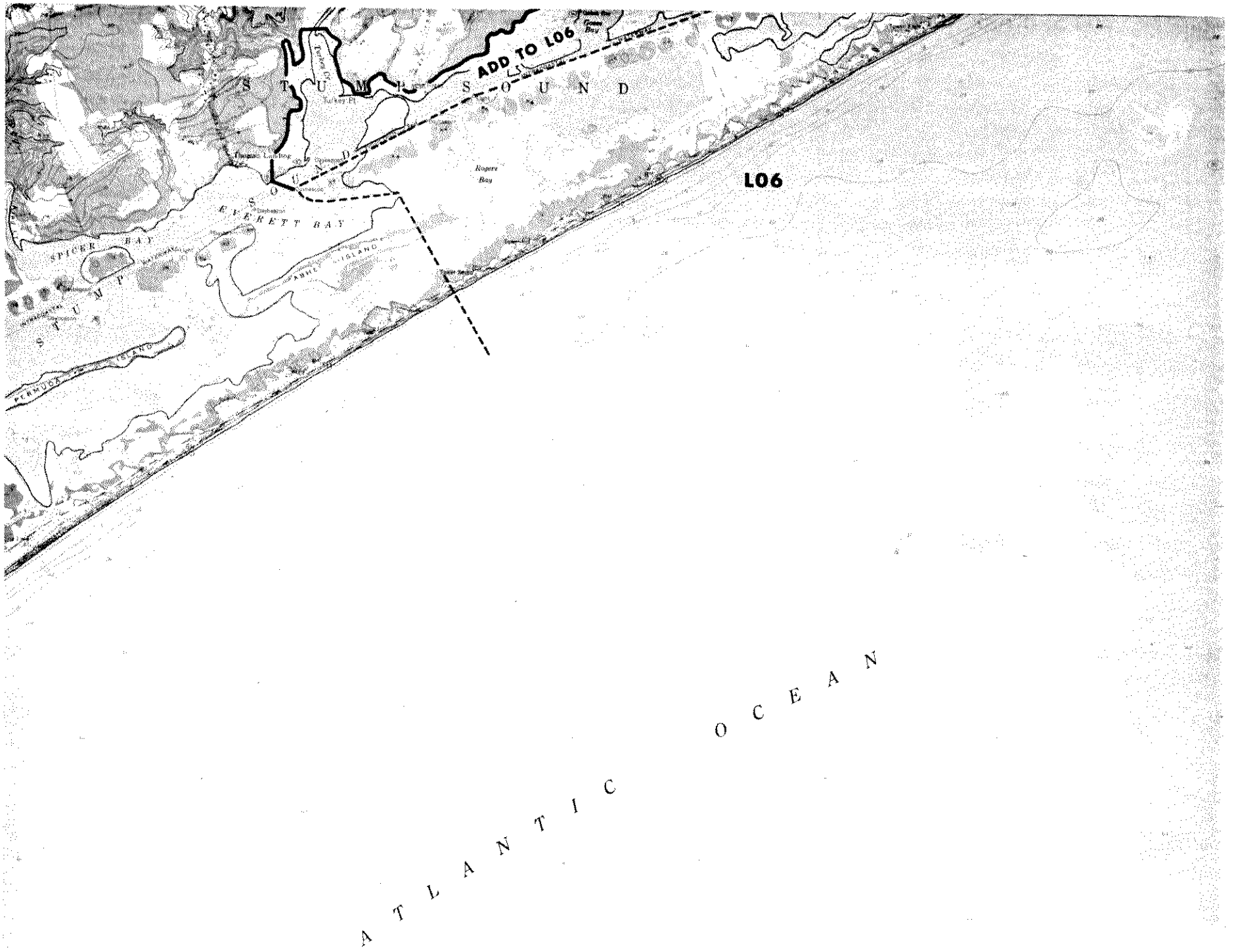
QUADRANGLE
SNEADS FERRY
NORTH CAROLINA



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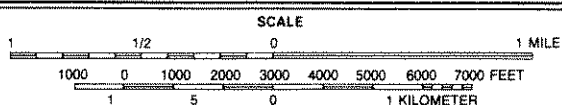
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



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Washington, D.C. 20240

QUADRANGLE
SPICER BAY
NORTH CAROLINA



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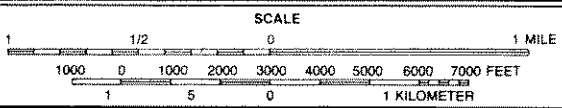
Report to Congress on the Coastal Barrier Resources System

**UNITED STATES
DEPARTMENT OF THE INTERIOR**



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Washington, D.C. 20240

QUADRANGLE
HAMPSTEAD
NORTH CAROLINA



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L07 - LEA ISLAND COMPLEX

State Position: The State of North Carolina supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: One letter was received supporting the addition of associated aquatic

habitat to the CBRS and informing DOI about development activities in the unit. The letter is reprinted below.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to the existing CBRS unit.

866

4/12/87

Hampstead, N.C.

The Coastal Barrier Study Group
Department of the Interior
National Park Service
P.O. Box 37127
Washington, D.C. 20013-7127

Re: Report to Congress: Coastal Barrier Resource System

Sea View:

We think, overall, the Executive Summary & Volume II (North Carolina) - as reviewed, are excellent reports.

The following comments respond to the recommended modifications and are directed toward their impact on the barrier islands in southeastern North Carolina - in particular.

We are in complete agreement with the expansion of the CBRS to include the associated wetlands and aquatic habitats - in particular those in our area of immediate concern - Lea Island Complex (L07). However, in the report, the narrative description of the development proposed on the barrier islands of Lea & Hutstaff is misleading. Of the structures mentioned, only (3) are habitable (and on a part-time basis) and the development (proposed 57 units, as you note) has been stable for a number of years (probably since the enactment of CBRRA). Again, as noted, the North Carolina estuarine system is the second largest among the lower 48 states. With conservation opportunities rapidly disappearing, it follows that the federal government should act with haste to assist financially in including Lea & Hutstaff Islands with Masonboro Island (L09) as part

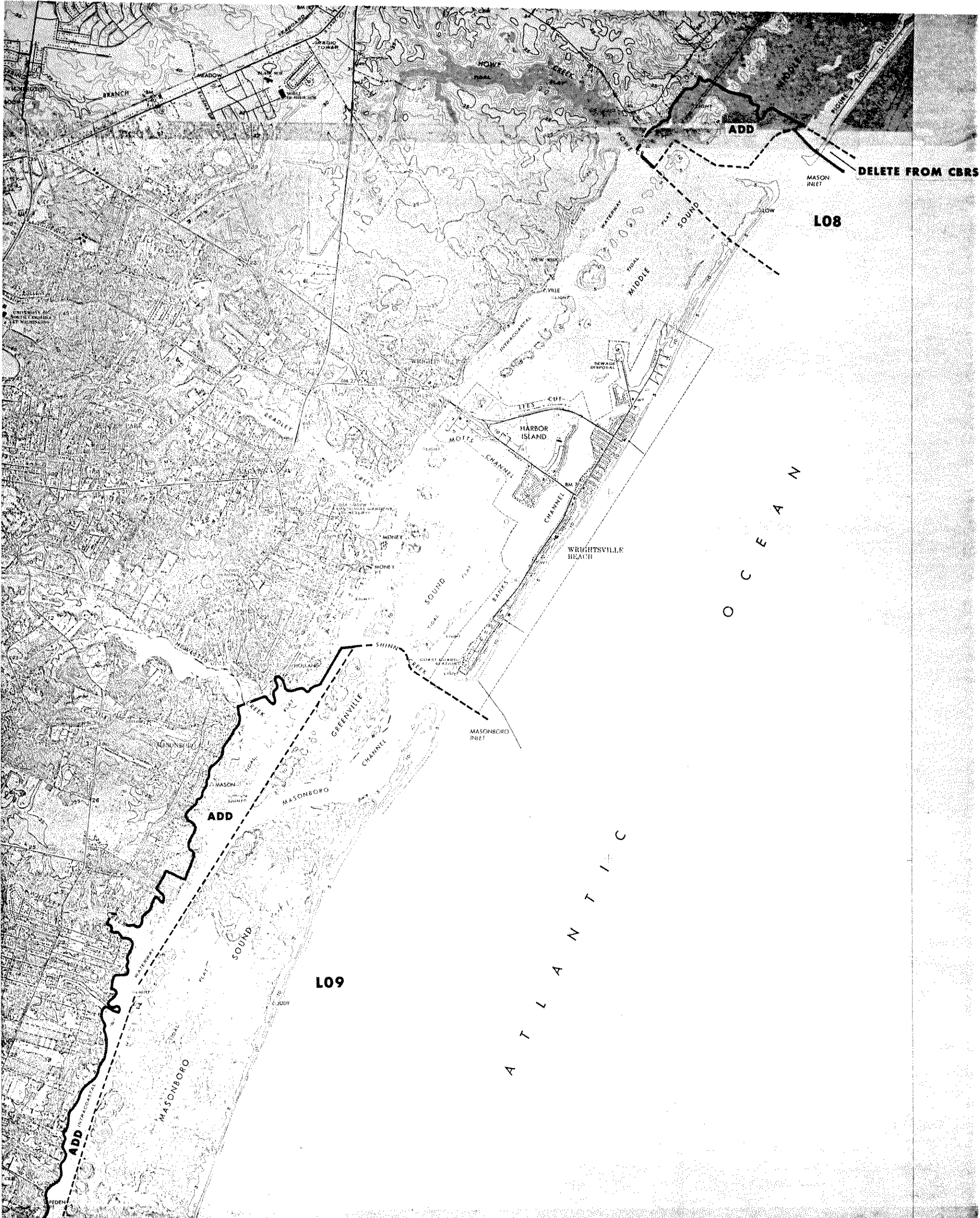
of the North Carolina Estuarine Sanctuary and add to our National heritage - or enact legislation severely restricting development on these barriers.

Other comments are as follows:

- 1) L05 - We oppose the deletion of military lands from the CBRS. "Essential to national security" is a rather far-fetched reason for the DOI not to comply with the tenets of CBRS.
- 2) We support the proposed study for redevelopment alternatives of barrier islands following storms; and.
- 3) We think that consideration should be given to including the undeveloped areas of the Bald Head Island complex (south of L09) in CBRS. Using report statistics, only 54.6 miles of the 197 miles of North Carolina coastline (not including Cape Hatteras and Cape Lookout National Seashore) are included in CBRS. This obviously leaves room for expansion of CBRS in our state.

We appreciate your concern for the intelligent management of our coastal resources and thank you for your consideration of these comments.

For Penderwater and Conservancy,
Daniel O. Pender, Director
327 Old Point Rd.
Hampstead, N.C. 28443



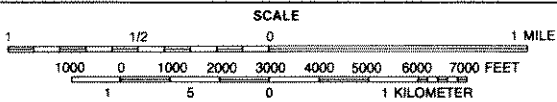
UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
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U.S. Department of the Interior
Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
WRIGHTSVILLE BEACH
NORTH CAROLINA



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L08 - WRIGHTSVILLE BEACH

State Position: The State of North Carolina supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: Four letters, including one from the Figure Eight Island Homeowners' Association, were received supporting a redelineation of L08 to delete that portion of the Figure Eight development that was already in place in 1982. The letters are reprinted below.

Response: The existing northern boundary of L08 cuts through the southern end of the

Figure Eight development. This development was already in place when CBRA was enacted in 1982. Using the 1982 aerial photograph of the unit, the DOI has located the interface of the developed and undeveloped portions of the barrier in 1982. This interface is about 500 ft south of the existing unit boundary.

DOI Recommendation: The DOI recommends moving the northern boundary of L08 about 500 ft south, as delineated here, to exclude development that already existed in 1982. The DOI also recommends adding the associated aquatic habitat to the CBRS unit.

592



FIGURE "8" BEACH HOMEOWNERS' ASSOCIATION, INC.
15 Bridge Road • Wilmington, North Carolina 28405 • Telephone (919) 666-0621

May 25, 1987

Coastal Barriers Study Group
National Park Service
U.S. Department of the Interior
P.O. Box 37127
Washington, DC 20013-7127

Re: Coastal Barrier Resource System (CBRS)
L08 Wrightsville Beach

To whom it may concern:


On behalf of the Figure Eight Island Homeowners' Association, consisting of over 500 property owners, we agree with the current Department of Interior's recommendation to delete the previously developed portions of Figure Eight Island from the CBRS.

Referring to the "Report To Congress: Coastal Barrier Resource System, Volume II, North Carolina, dated February 1987", the map on page 21 indicates the subject area to be deleted. Due to the scale of the map, an exact location of the boundary of unit L08 is difficult to pinpoint relative to the lots on Beach Road South. We strongly recommend an accurate on-the-ground survey be done to insure that no part of the Figure Eight Island Development is mistakenly included in the CBRS.

I would be available for an on-site inspection of the subject property at any time. I have also taken the opportunity to include much of the correspondence with various people and agencies over the years.

Thanking you in advance for your consideration and allowing us to again comment on the above serious problem.

Sincerely,


Arthur Poineau
Administrator

AP/lm

enclosures

377

THE WINSTON GROUP, INC.

P. O. BOX 31826 / RALEIGH, NC 27622 / 2209 CENTURY DRIVE / SUITE 300
TELEPHONE 919-782-0104

May 12, 1987

Coastal Barriers Study Group
National Park Service
U. S. Department of the Interior
P. O. Box 37127
Washington, DC 20013-7127

Re: Coastal Barrier Resource System (CBRS)
L08 Wrightsville Beach

To Whom It May Concern:

The undersigned property owner and interested party agrees with the current Department of Interior's recommendation to delete the previously developed portions of Figure Eight Island from the CBRS.

Referring to the "Report To Congress: Coastal Barrier Resource System, Volume II, North Carolina, dated February 1987", the map on page 21 indicates the subject area to be deleted. Due to the scale of the map, an exact location of the boundary of unit L08 is difficult to pinpoint relative to the lots on Beach Road South. We strongly recommend an accurate on-the-ground survey be done to insure that no part of the Figure Eight Island Development is mistakenly included in the CBRS.

Thank you for the opportunity to comment.

Sincerely,


Charles M. Winston

CMW:lmr

422

8 Clarke Road
Richmond, VA 23226
May 14, 1987

Coastal Barriers Study Group
National Park Service
U.S. Department of the Interior
P.O. Box 37127
Washington, D.C. 20013-7127

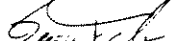
Gentlemen:
Coastal Barrier Resource System (CBRS)
LO8 Wrightsville Beach

I, as a property owner and interested party, agree with the current Department of Interior's recommendation to delete the previously developed portions of Figure Eight Island from the CBRS.

Referring to the "Report to Congress: Coastal Barrier Resource System, Volume II, North Carolina, dated February 1987"; the map on page 21 indicates the subject area to be deleted. Due to the scale of the map, an exact location of the boundary of unit LO8 is difficult to pinpoint relative to the lots on Beach Road South. We strongly recommend an accurate on-the-ground survey to be done to ensure that no part of the Figure Eight Island Development is mistakenly included in the CBRS.

Thank you for the opportunity to comment.

Sincerely,


George W. Taylor

Property on Figure Eight Island
19 Pipers Neck
and
183 Beach Road South

cc: Charles M. Winston

1152

SECURITY BUILDING COMPANY, INC.
PO Box 967 Chapel Hill NC 27514 (Area 919) 929-3356

June 22, 1987

Coastal Barriers Study Group
National Park Service
U.S. Department of the Interior
PO Box 37127
Washington, D.C. 20013-7127

RE: COASTAL BARRIER RESOURCE SYSTEM (CBRS)
LO8 WRIGHTSVILLE BEACH

TO WHOM IT MAY CONCERN:

The undersigned property owner and interested party agrees with the current Department of Interior's recommendation to delete the previously developed portions of Figure Eight Island from the CBRS.

Referring to the "Report to Congress: Coastal Barrier Resource System, Volume II, North Carolina, dated February 1987", the map on Page 21 indicates the subject area to be deleted. Due to the scale of the map, an exact location of the boundary of Unit LO8 is difficult to pinpoint relative to the lots on Beach Road South. We strongly recommend an accurate on-the-ground survey be done to insure that no part of the Figure Eight Island Development is mistakenly included in the CBRS.

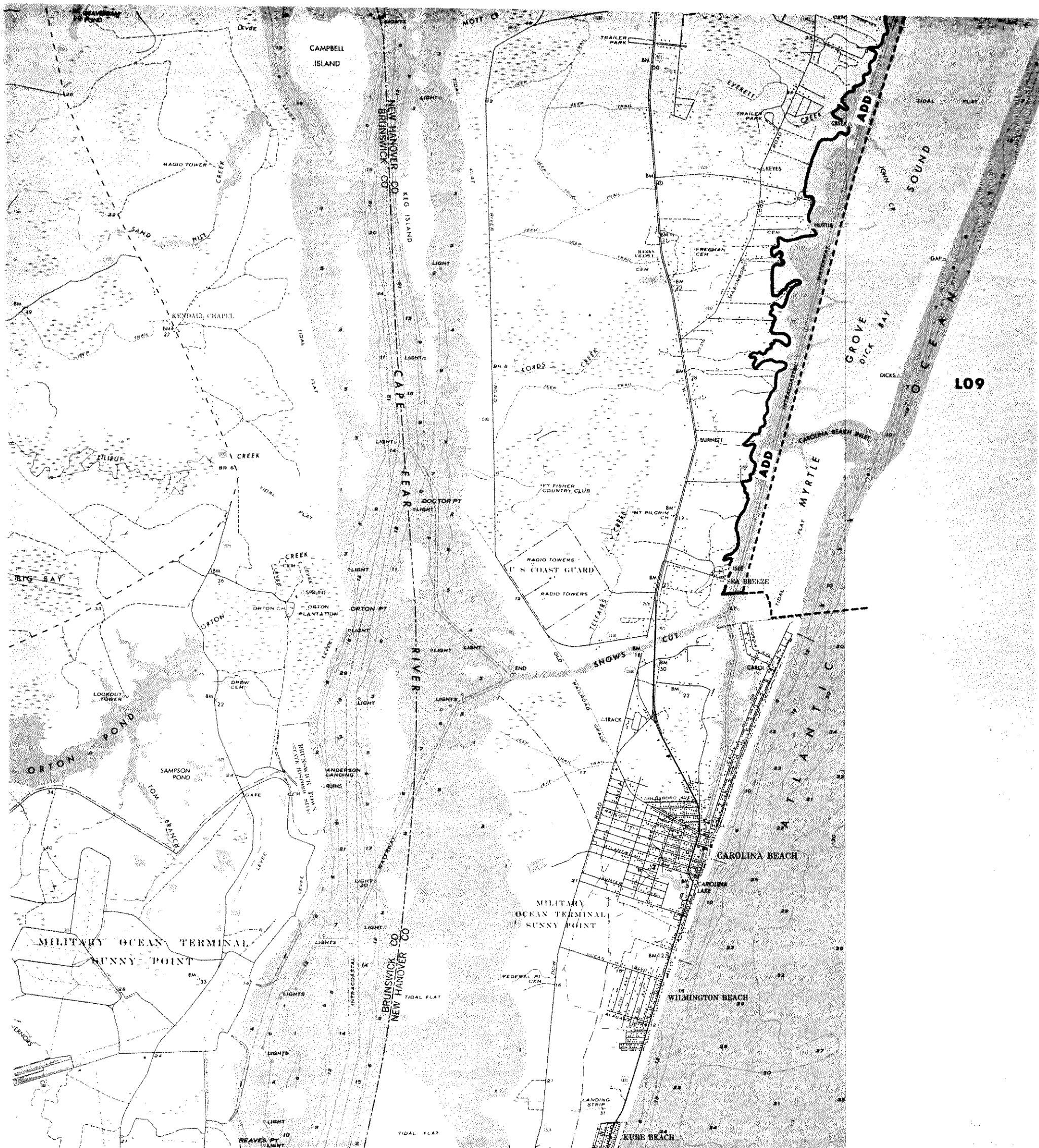
Thank you for the opportunity to comment.

Sincerely,


SECURITY BUILDING COMPANY, INC.

J.P. Goff
President

JPG:rg



109

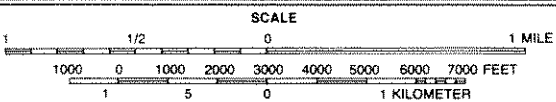
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



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U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
CAROLINA BEACH
NORTH CAROLINA



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Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

L09 - MASONBORO ISLAND

State Position: The State of North Carolina supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: Two letters were received supporting the addition of the associated aquatic habitat to L09 and requesting that DOI ensure that all the wetlands between the barrier and the Intracoastal Waterway be included in the Department's recommended

additions. The two letters are reprinted below.

Response: The additions recommended by DOI include all the wetlands between Masonboro Island and the Intracoastal Waterway.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to the existing CBRS unit.

Board of Directors
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Pamela Parr
H. Van Ried
Dr. William Wagener
Dean Weber

744

Society For Masonboro Island Inc.



June 9, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
P.O. Box 37127
Washington, D.C. 20013-7127

Dear Ladies and Gentlemen:

On behalf of the Society For Masonboro Island, I would like to support the recommendations of the Coastal Barriers Study Group to continue the inclusion of Masonboro Island, located on the southeast corner of North Carolina, within the boundaries of the Coastal Barrier Resources System (CBRS). In addition, the Society suggests the inclusion of the entire area of the Masonboro Island complex that is proposed for inclusion as a component of the North Carolina National Research Reserve System. This encompasses the area between the barrier island and the eastern side of the American Intracoastal Waterway. We understand that federal funding for roads, bridges, sewers, water lines, housing, and insurance is prohibited for all area with the CBRS boundaries.

The Society For Masonboro Island has good reason to support the recommendations that provide added protection for Masonboro Island.

Masonboro Island, eight miles long, is the largest undisturbed barrier island along the southern part of the North Carolina Coast. This 4,300 acre complex, consisting of marsh, sound, tidal creeks and spoil islands, is particularly important as an example of an undisturbed system in the midst of many developed islands.

The island has been included in the North Carolina National Research Reserve System. Over \$900,000. in Federal funds have been allocated for the purchase of the island from its current private land owners. These actions have demonstrated the State and Federal government's commitment to the preservation of Masonboro Island.

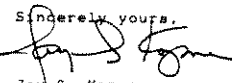
P.O. Box 855 Wrightsville Beach, N.C. 28480 (919) 395-6477

Coastal Barriers Study Group
Page 2

As a natural barrier island and estuarine system, Masonboro Island serves as an invaluable living classroom and research site to the nearby University of North Carolina.

Colonies of terns and shorebirds nest on Masonboro Island. In addition, the threatened loggerhead sea turtle comes ashore to Masonboro Island in the spring and summer to nest.

The Society For Masonboro Island is working toward the preservation of the island and therefore strongly supports the recommendations of the Coastal Barriers Study Group to include Masonboro Island within CBRS boundaries.

Sincerely yours,

Jay S. Kapner
Executive Director

C.C. Governor James Martin
Senator Terry Sanford
Senator Jesse Helms
Congressman Charlie Rose
Congressman Martin Lancaster
Congressman Walter Jones
David Owens, Coastal Management Division, NRCDC
National Wildlife Federation



Working for the Nature of Tomorrow
NATIONAL WILDLIFE FEDERATION
 1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

1282

Coastal Barriers Study Group
 Department of the Interior
 National Park Service
 P.O. Box 37127
 Washington, D.C. 20013-7127

RE: Comments on the Coastal Barrier Resources Act--Section 10 Draft Report to Congress, 52 Federal Register 9618-9619

Dear Sir or Madam:

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society are writing in response to the Department of the Interior's Federal Register Notice of March 23, 1987 soliciting comments on the Draft Report to Congress: Coastal Barrier Resources System--Executive Summary.

Our organizations have a longtime interest in the conservation of coastal barriers. The Natural Resources Defense Council was the founding organization of the Barrier Islands Coalition in 1978. Likewise, the National Wildlife Federation, the Coast Alliance, and the Oceanic Society became members of that coalition in 1979 to help seek protection of coastal barriers.

Our organizations have led efforts to pass legislation which would conserve the natural resources of coastal barriers--first, the flood insurance prohibition in the Omnibus Reconciliation Act in 1981 and then, the Federal financial prohibition in the Coastal Barrier Resources Act (CBRA) in 1982. We continue to support the goals of CBRA and expansion of the Coastal Barrier Resources System (CBRS) throughout the United States and its territories. The federal government should not be subsidizing development in hazardous areas which destroys productive coastal ecosystems, endangers the lives and properties of shoreline residents, and costs federal taxpayers millions of dollars each year in flood insurance claims and disaster relief.

The need for an expanded Coastal Barrier Resources System in which federal development subsidies are prohibited is becoming increasingly critical in light of the projected rise in sea levels due to global warming. As water levels rise, so will the costs of protecting existing structures, the damages from erosion and flooding, and the risk to human life and property. Unfortunately, however, development in these unstable coastal areas continues to grow at a frightening pace. We feel strongly, therefore, that it is essential that the Department recommend maximum expansion of the System to include the eligible areas on all of America's coasts

- 2 -

before these sites are irrevocably committed to development. An appendix of specific comments on additions to and deletions from the System follow our general comments.

PROPOSED RECOMMENDATIONS FOR ADDITIONS TO OR DELETIONS FROM THE CBRS

We support the Department's recommendation to expand the definition of a "coastal barrier" to include landforms which function as coastal barriers in protecting the mainland and adjacent aquatic habitats, even if they are not composed of unconsolidated sediments as are barriers in the traditional definition. Use of this expanded definition in delineating CBRS units is consistent with the conservation goals of CBRA and would allow for the inclusion of such new geological formations as undeveloped beach rock, cemented dunes, fringing mangroves and associated coral reefs, cheniers, discontinuous outcrops of bedrock, and coarse glacial deposits. Since these areas serve the same function as coastal barriers and are as vulnerable to development pressure, sea level rise, and storm damage as traditionally-defined coastal barriers, it is appropriate that they also be protected within the System.

APPENDIX

COMMENTS ON SPECIFIC COASTAL BARRIER AREAS

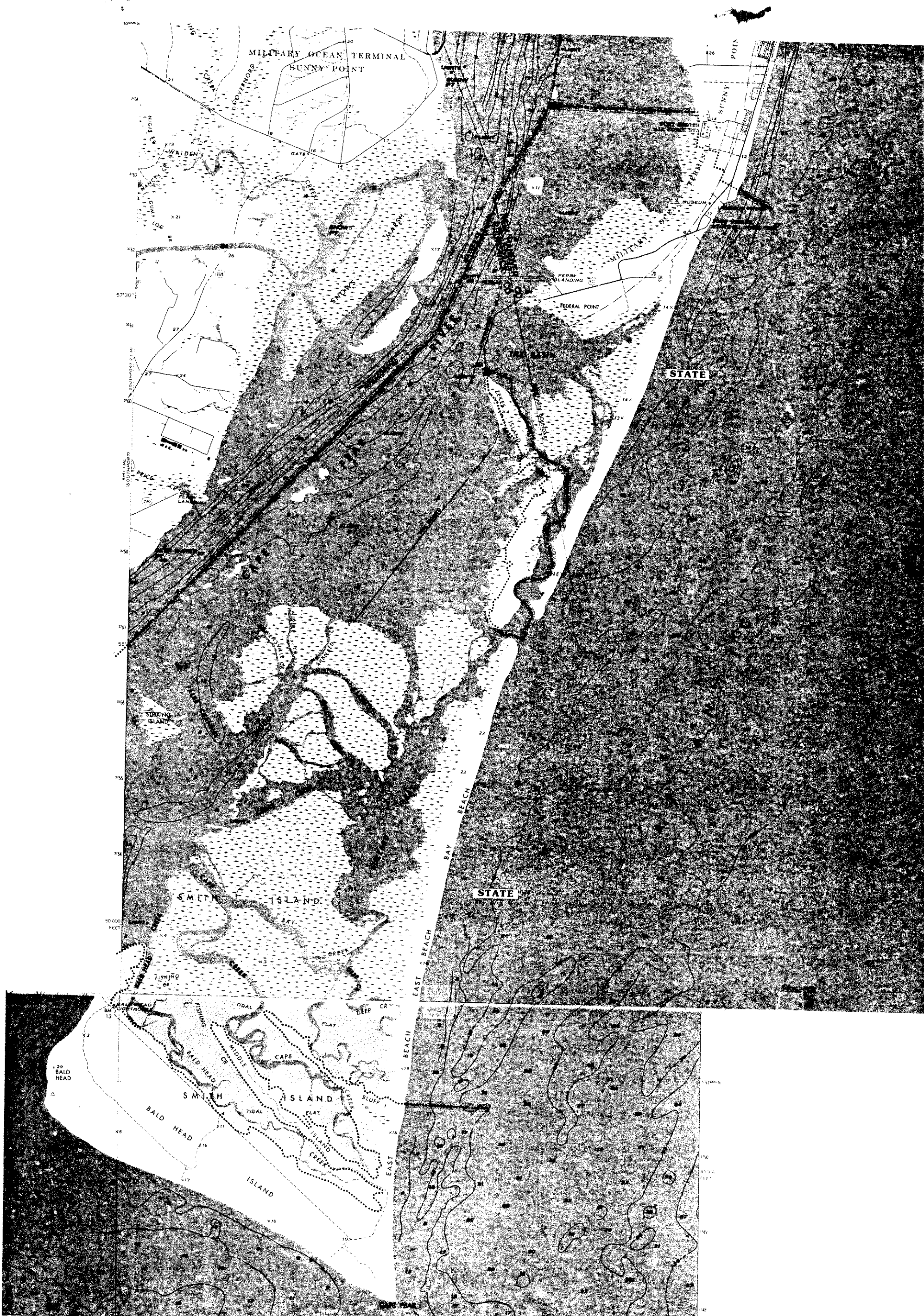
The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society endorse the inclusion of all undeveloped coastal barriers identified by the Department of Interior in the March 1985 inventory, as well as some additional areas mentioned below. Following are our comments on some of the specific areas.

North Carolina

As with South Carolina, we are very pleased with the Department's recommendations for additions to the System within North Carolina. North Carolina has some of the most beautiful and popular shoreline on the East Coast. Unfortunately, its coast is also experiencing the unabating problems of sea level rise and erosion--a prime example of this being the two houses on Nags Head which recently collapsed into the sea--making maximum expansion of the System in this state very important.

L-09 Masonboro Island

In addition to the Department's recommended additions, we request the inclusion of the entire area of the Masonboro Island complex proposed for inclusion within the North Carolina National Research Reserve System, including the area between the barrier island and the Intracoastal Waterway. Masonboro Island is the largest undisturbed barrier island along North Carolina's southern coast and serves as an invaluable research site for the University of North Carolina. In addition, this island provides important nesting habitat for tern and shorebird colonies, as well as the threatened loggerhead sea turtle.



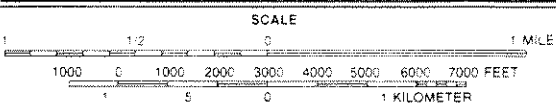
Report to Congress on the Coastal Barrier Resources System

**UNITED STATES
DEPARTMENT OF THE INTERIOR**



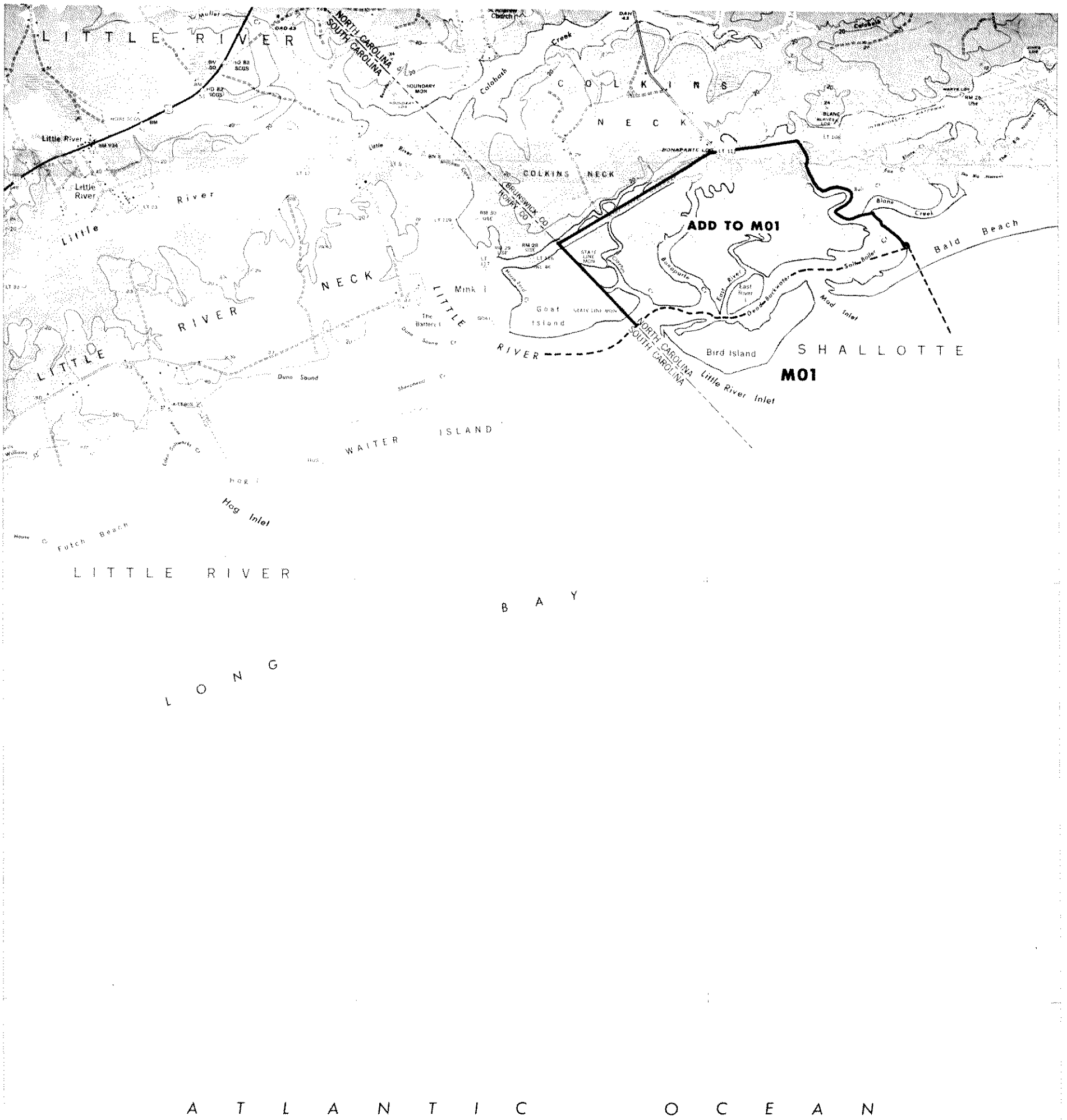
Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
KURE BEACH
NORTH CAROLINA



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System (Section 10 of P.L. 97-348)
- - - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle



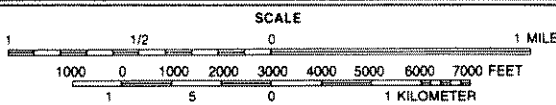
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
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U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
LITTLE RIVER
NORTH CAROLINA



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Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

M01 - WAITES ISLAND COMPLEX

State Position: The State of North Carolina supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: One letter supporting the addition of the associated aquatic

habitat to M01 was received. It is reprinted below.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to the existing CBRS unit.

953

305 N. Atlantic Ave.
Southport, NC 28461

Coastal Barriers Study Group
U.S. Dept. of the Interior
National Park Service - 498
PO Box 37127
Washington, DC 20013-7127

Dear Sir or Madam:

I am writing to express my support for the expansion of the Coastal Barriers Resources System. Specifically, I am supporting the inclusion of the 1370 acres of wetlands in the Waites Island Complex (Unit ID Code M01) into the CBR System. Besides being an important component of the barrier island ecosystem, these marshes are important buffers to the highly developed mainland during flooding associated with storms.

Again, I would like to urge that no deletions be made from the entire System. Barrier Islands are one of the most rare and fragile, yet productive ecosystems on Earth, and their protection is of extreme importance.

Sincerely,

Walter E. Marley

Walter E. Marley