



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Cape Lookout National Seashore  
131 Charles Street  
Harkers Island, North Carolina 28531



1.A.2.

June 11, 2014

Colonel Steven A. Baker, Commander and District Engineer  
Wilmington District  
U.S. Army Corps of Engineers  
69 Darlington Avenue  
Wilmington, North Carolina 28403

Dear Colonel Baker:

Thank you for your patience as we work through the public comments and other input we have received related to the Morehead City Dredged Material Management Plan / Draft Environmental Impact Statement. As you know, there has been a significant concern expressed about the placement of sand on Shackleford Banks within Cape Lookout National Seashore. After reviewing the public feedback and various internal discussions, the National Park Service (NPS) requests dismissal of the alternative to place dredged material on the beach during the time span of this proposed Dredged Material Management Plan for the following reasons:

- While recent surveys have shown that the offshore profiles along Shackleford Banks have experienced a loss in sediment volume, the database is rather limited. The amount of sediment volume loss that has resulted from maintenance activities of the Morehead City Harbor Channel, rather than natural processes, has also not been able to be determined.
- This request for dismissal is consistent with NPS policy. NPS agrees with USACE that the sediment budget and shoreline processes along Shackleford Banks are not completely “natural” because of the navigation channel. Therefore, to date we have followed the NPS Management Policies that direct us to analyze alternatives for restoration or mitigation of human-impacted shoreline processes. Participation in the DMMP/EIS was fully consistent with these policies. However, the problem in this case is that we are not sure if beach placement as described in the DMMP would truly restore or mitigate the impacts of the channel because of the nature of the dredged material, the quantities proposed, the long-term sea level rise in this area, and the processes of this particular island. In this case, the placement of the dredged material under the DMMP may not restore natural conditions or mitigate the impacts of the channel; instead it may make the situation worse.

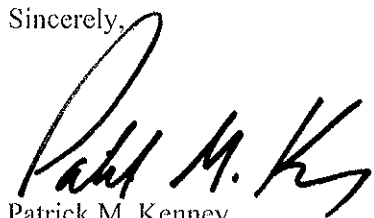
- NPS would prefer to have a larger database of profile surveys to determine if the sediment volume loss of approximately 166,450 cubic yards per year, as calculated from 5 surveys from 2000 to 2010 continues in this trend, or is possibly accelerating.
- Continued monitoring of the beach profiles would assist the NPS with its assessment of the degree to which beach placement of sediment would impact natural resources and processes so that management decisions may be as fully informed as possible.
- Shackleford Banks is proposed wilderness and management intervention should only be taken when there is knowledge that will result in mitigating past mistakes, impacts of human use and influences outside the proposed wilderness boundary and where the gains from mitigation outweigh the effects of sand placement.

The NPS does support placement of sediment in the nearshore area of Shackleford Banks. The NPS would prefer that the placement occur in water depths of less than 25 feet or less for the following reasons:

- The grain size and sorting characteristics of the Morehead City Outer Harbor Channel most closely match the natural beach characteristics of the submarine portion (below mean Low Water to -24 ft) of the beach at Shackleford Banks.
- The close match of the sediment characteristics of the natural substrate sediment and the channel sediment proposed for placement would minimize any adverse environmental effects.
- Sediment placed in less than 24 ft of water could be entrained into the littoral system and migrate to the west and may contribute to the stability of the eastern side of the ebb tide delta. The additional sediment in the nearshore area and ebb tide delta may also serve to slow or decrease the sediment volume loss in the Shackleford Banks nearshore profiles over time.
- Nearshore placement would not result in the direct impacts to natural resources associated with beach placement and would not impact visitor use and enjoyment.

Again we appreciate your patience as we worked through this complex project. We are ready to assist you to address the modifications to the document or responses to comments that may be required to finalize the project. We greatly appreciate the cooperation you and your staff have provided us over during this planning effort. If you have any questions, please contact me at (252) 728-2250, extension 3014.

Sincerely,



Patrick M. Kenney  
Superintendent