

FACT OR FICTION?
CORPS/NPS'S PROPOSAL TO PLACE DREDGED MATERIAL ON SHACKLEFORD BANKS

1. “There is an erosion ‘problem’ at Shackleford.”

Fiction. As explained by Orrin Pilkey, James B. Duke Emeritus of Geology Professor at Duke University, Shackleford Banks does not need any sand. While Shackleford is eroding, it is no different than the vast majority of barrier islands worldwide. Shackleford is doing what all undeveloped islands are doing. It is responding to sea level rise. It is thinning down to get ready for sea level rise.

There is no erosion “problem” at Shackleford. The current erosion at the western tip will not eat up the island and reflects why the state has designated inlet hazard zones (*i.e.*, reduce development near inlets). It should be noted that the area being lost to erosion did not exist 50 years ago, but was created by a relatively recent buildup of sand at the west end of Shackleford. The jetty among the dunes in the middle of the island was in the water during the World War II.

Why nourish almost half of Shackleford’s beach length to repair “damage” at the inlet? This disposal will simply delay the island’s natural response to sea level rise, which is what national seashores are all about. It’s not even clear that disposal of dredged material at the middle of the island will benefit the western tip.

2. “The federal agencies are only putting the sand back from where it came.”

Fiction. Although the Corps and NPS propose to place dredged material based on calculated loss volumes, the Corps will not place dredged material from “where it came.” On Shackleford Banks, dredged material would be placed approximately 1.5 miles from the west end over a 3.65 stretch of beach. However, material would not be placed on the western tip of Shackleford, the area most significantly impacted by the Corps’ activities, because if it was placed in such a location, it would be rapidly transported back into the channel and exacerbate an already bad shoaling issue in this section of the channel. Draft DMMP, p. 53.

3. “The federal agencies are relying on the best available science.”

Fiction. The Corps has not evaluated the fate and transport of the dredged material. Once the dredged material is placed on Shackleford, will it increase shoaling rates? Will it even benefit Shackleford Banks? The Corps and NPS cannot answer these questions because they did not perform any modeling. Instead, the Corps and NPS plan to monitor the dredged material *after* it is disposed at Shackleford.

Despite “support[ing] one of the best and most unique surfing spots on the east coast of the United States,” Draft DMMP, p. 208, the Corps did not evaluate the impacts of the proposed beach and nearshore disposal at Shackleford on the wave break and surfing. Will the disposal adversely impact surfing? Again, the Corps and NPS do not know because they did not consider this issue.

4. “NPS only wants the amount of sand lost as a result of the navigation project.”

Fact? While NPS might only *want* the amount of sand lost as a result of the Corps’ activities, they would be not getting this amount. They would be getting significantly more dredged material. As acknowledged by the Corps, “[t]he [loss] volumes for these areas do not separate volume loss resulting from the navigation project from the loss that would naturally occur with no project in place.” Draft EIS, p. 46.

5. “By placing dredged material on Shackleford Banks, NPS seeks to preserve Shackleford for future generations.”

Fact. While we do not question NPS’s intentions of preserving Shackleford for future generations, we do not agree that placing dredged material on Shackleford will further this goal. Shackleford is responding to sea level rise as all undeveloped barrier islands do. It is thinning on the back and front side. The erosion at the western tip does not threaten the island. The Coalition seeks to preserve Shackleford in its natural, undisturbed state for future generations.

6. “Disposal of dredged material will provide ecological and recreational benefits to Shackleford.”

Fiction. There is no evidence that erosion at Shackleford is adversely impacting the ecology and recreational use of Shackleford. On the other hand, disposal of dredged material at Shackleford Banks has significant potential to adversely impact the undisturbed ecosystem of Shackleford Banks due to the use of heavy mechanized equipment, addition of sand, and nighttime lighting.

Charles “Pete” Peterson, Distinguished Professor at the University of North Carolina, Institute of Marine Sciences, agrees that putting beach-quality sand provides no natural benefits, while allowing the island to erode – even if dredging is the cause – would provide benefits to Shackleford. “Two wrongs don’t make a right, and the cure is likely worse than the disease,” Peterson claims. “That end of Shackleford is a breeding area for shore birds, and it still has active, healthy dunes. Having that as a mobile point is providing habitats. It would allow shoals to form where birds feed. It represents critical habitat that we don’t have much of. It forms a unique complex. That system as a whole is more valuable than the separate parts.”

7. “Continued erosion may adversely affect the wilderness character of Shackleford Banks.”

Fiction. In 1985, NPS described Shackleford Banks as follows: “Undulating high dunes and maritime forest enhance both the feeling of remoteness and the opportunities for solitude. All the island is scenic. Visitors disperse along the island on foot to fish, beachcomb, swim, picnic, hike, backpack, and camp. Natural processes dominate. The power of the island is always evident from the sound of the surf, and the dynamism of the island is emphasized by deposits and traces from past storm overwash. Studying the island environment and associated geological features and processes is of increasing interest to scientists and educators. These attributes – remoteness, scenic beauty, and natural conditions – are in contrast to other neighboring coastal islands that are easily accessible, more heavily used and are undergoing development.”

There is no evidence that erosion threatens these unique attributes of Shackleford Banks.

8. “Bogue Banks wants *all* the sand and does not care about Shackleford.”

Fiction. While residents of Bogue Banks primary interest may lie in protecting Bogue Banks, many residents seek to protect Shackleford as well. Not only would placing dredged material on Shackleford provide no benefits to Shackleford and likely increase shoaling of the channel; it would also reduce by almost half the amount of sand available for beach placement at Bogue Banks, where it is needed to offset impacts of the navigation project and to protect valuable investments in property and infrastructure as well as recreational uses, including Fort Macon, an important historic landmark and the most visited state park. Residents of Bogue Banks are not requesting any more sand than Bogue Banks has received in the past. The property values for Atlantic Beach alone total \$1,709,259,545 of which \$622,780.775 represents ocean front property. The beachfront properties of Atlantic Beach are a critical tax revenue producer. These funds are used for the County schools and other tax-supported items in Carteret County. It is critical that a sufficient quantity of sand be placed on Bogue Banks where it will provide protection for Atlantic Beach and other communities to the west and recreational benefits.

The Corps has recognized that in addition to the measured volumetric losses resulting from the navigation project, the removal of millions of cubic yards from the littoral system by dumping it offshore is a major cause of man-induced erosion. Bogue Banks, in particular, has been impacted by the navigation project because the deepened channel essentially cuts off the natural flow of sand from Shackleford to Bogue Banks. The Corps has acknowledged that these impacts must be offset.

9. “NPS only wants an option to decide later whether it wants the sand.”

Fact. While this “option” would work well for the Corps and NPS, it would not be so beneficial to the public. Once the preferred alternative of the DMMP is adopted and the Record of Decision is issued, the public will have *no* input in NPS’s decision whether or not to place dredged material on Shackleford Banks. If this plan is bad for Shackleford and Bogue Banks now, it will be bad three years from now.

10. “If circumstances warrant, the Corps and NPS will hold a public hearing after the final Environmental Impact Statement is issued, which will provide the public a meaningful opportunity to provide oral comments.”

Fiction. Although the Record of Decision (*i.e.*, final decision) will not be issued at this point, once the final Environmental Impact Statement is released, the federal agencies have essentially reached their decision. Because the Corps and NPS did not provide the public an opportunity to make oral comments at the recent public meeting, the public’s best opportunity to influence the contents of the federal plan is NOW while the document is in draft form. Written comments will be accepted until February 3, 3014.