



North Carolina Department of Environment and Natural Resources  
Division of Marine Fisheries

Beverly Eaves Perdue  
Governor

Dr. Louis B. Daniel III  
Director

Dee Freeman  
Secretary

MEMORANDUM:

TO: Melba McGee, DENR Environmental Coordinator

THROUGH: Anne Deaton, DMF Habitat Section Chief *AD*

FROM: Jessi Baker, DMF Habitat Alteration Permit Reviewer *JB*

SUBJECT: Morehead City Harbor DMMP - Scoping

DATE: May 31, 2011

The North Carolina Division of Marine Fisheries (DMF) submits the following comments pursuant to General Statute 113-131. The USACE is preparing a 20-year Dredged Material Management Plan (DMMP) and EIS to ensure sufficient dredged materials disposal capacity from 2013-2032 for Morehead City Harbor navigation channel. The USACE requests comments specifically on the new alternative beach placement area on Shackleford Banks. This alternative is being considered to offset any erosion of the southern portions of this island due to the maintenance of the Morehead City Harbor and channel. The National Park Service has agreed to be a cooperating agency for the DMMP/EIS.

Shackleford Banks is a part of the Cape Lookout National Seashore and is therefore protected from development. There is no record of dredged material disposal on the beach of this island. The ocean nearshore waters along this island are largely undisturbed and are valuable fishing areas. Nesting sites for Wilson's plover, American oystercatcher, and sea turtles were reported by the National Park Service in 2010 on Shackleford Banks.

The placement of dredged sand on the beach (beach nourishment) can have significant impacts on fish habitat located in the wash zone, surf zone, and nearshore ocean areas (Deaton et al. 2010). The burying of these habitats with sand kills the benthic invertebrates that occupy these areas (e.g., amphipods, polychaetes, coquina clams, and mole crabs). Since these organisms serve as the primary prey source for juvenile and adult fishes, the elimination of this food source could disrupt the local food web.

Since Shackleford Banks is an undisturbed island, serving as valuable habitat to fish and rare species, and there is no development to protect by using the beach nourishment shoreline stabilization techniques, DMF sees no justification for the amount of disturbance that would be caused by including Shackleford Banks as a disposal area.

Based on these concerns, DMF would anticipate detailed discussions of the following for Shackleford Banks and all other disposal areas included in the DMMP/EIS.

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- All Essential Fish Habitat (EFH) and state protected habitats that occurs in this area
- All fish habitats outlined in the most recent NC Coastal Habitat Protection Plan (CHPP) that occur in the area
- Potential impacts to the benthos of the surf/swash zone and a detailed plan to monitor for impacts
- Potential impacts to the benthos of the nearshore areas and a detailed plan to monitor for impacts
- Potential impacts to commercial or recreational fishing including any indirect impacts due to adverse impacts to fish and fish habitat
- Potential direct impacts from dredging, beach placement, and nearshore placement and how those impacts will be minimized

If the USACE would like assistance in locating information regarding the above topics or has any other questions, please contact Jessi Baker at (252) 808-8064 or [jessi.baker@ncdenr.gov](mailto:jessi.baker@ncdenr.gov).