



North Carolina
Coastal Federation
Working Together for a Healthy Coast

April 10, 2014

Braxton Davis
Director
N.C. Division of Coastal Management
400 Commerce Ave
Morehead City, North Carolina 28557

Dear Dr. Davis:

Please accept the following comments on the ongoing Inlet Management Study on behalf of the N.C. Coastal Federation. For the past 33 years the federation has been taking an active role in the protection of North Carolina's coastal water quality, habitat, and public beach access.

Following are the main points that the federation considers critical when it comes to management of North Carolina's inlets:

1. We should always strive to manage inlets in a manner that perpetuates their natural values and functions. Inlets are high-energy components of barrier island system that act as self-adjusting safety valves in the barrier island sand-dam. Maintaining their natural dynamic to the highest extent possible increases their critical role in barrier island evolution.
2. It is possible to address many human needs around inlets (access, navigation, and protection of investments) and respect the natural functions of inlets.
3. The more we intervene and try to overpower the natural functions of inlets, the more costly and damaging those interventions will become, and the costs will continue to escalate because there is no permanent solution to inlet management.
4. Adequate and compatible sand for beach renourishment should be found through regional planning, and not from inlet systems.
5. We need good monitoring and evaluations of all inlet management to learn what the best practices are.

It is important to have a consistent way to manage inlets in North Carolina for generations to come, and the federation applauds the Coastal Resources Commission for working towards doing that.



Respecting natural functions of inlets is key to the success of inlet management. We're lucky because most inlets in our state are still largely natural with only minor impacts in how they function that have resulted from human management activities. Only two inlets in North Carolina are heavily altered - Beaufort Inlet and the mouth of the Cape Fear River. Both of these inlets have been radically altered and made into ship channels. The more inlets are dredged and altered, the more costly it is each year to maintain these inlets in their non-natural conditions.

In addition, most land uses near N.C. inlets are now established, and all these lands are subject to state and local development restrictions. Moreover, most inlets are critical habitat for many important fish and wildlife, and the shorelines and channels around inlets are heavily used for boating, fishing and swimming.

Future management of our inlets should reflect their current status and uses. This means:

1. Inlets that function as mostly natural systems should be managed to maintain those natural processes.
2. Highly altered inlet systems may need more unnatural interventions to deal with the negative consequences of the existing disturbances to those systems.
3. Existing limitations on locating new development within hazardous inlet lands should never be relaxed, and should be increased when economically feasible.

These recommendations are based upon the requirements of existing federal and state environmental laws, and local zoning and planning, and the fact that over time these locations will become even more hazardous and more costly places for permanent development and infrastructure.

In conclusion, the federation makes the following recommendations:

1. The highest priority should always be given to maintaining the ability of an inlet system to function naturally. This does not mean that inlets cannot be "managed" to some degree. Examples of management measures that work with and preserve the natural ways inlets function include spot dredging of natural channels to aid in recreational navigation as well as realignment of channels in inlets to help avoid erosion hotspots on adjacent barrier islands. However, these measures must be done in a way that does not disrupt natural inlet processes.
2. Second priority should be to work to avoid escalating the extent of disruptions to natural processes within inlets that are already heavily modified, and to attempt to replicate natural inlet processes where that may still be feasible.
3. No inlet should ever be viewed as a "sand mine" for beach renourishment projects unless the sand is going to be dredged anyway for established navigation channels. The extent of dredging should be based upon real navigation requirements, and not the amount of sand needed for beach renourishment. Sand for renourishment should be found outside of inlet systems as part of regional sand management planning.

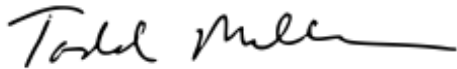
4. Adequate monitoring and evaluating our past successes and failures in dealing with inlet issues is necessary. We should document how well previous management measures have worked as intended, how much those measures have ultimately cost, and fully document environmental consequences. Monitoring and evaluation need to be part of project design, and not conducted piecemeal as an afterthought. It is critical to require adequate record keeping up front so that projects can be fully analyzed.

These recommendations will align with the following real world conditions:

1. Most local governments support minimizing development in these highly hazardous locations, or at least, not increasing the potential for development beyond existing standards;
2. Paying for inlet management is increasingly a shared partnership between local and state government, and we have to find economical ways to accomplish this management because money is very limited.
3. The cost of providing services and insurance in these hazardous areas will continue to increase and place more of a burden on property owners.
4. Federal environmental laws will restrict projects that cause damage to valuable and already protected habitat for fish and wildlife.

Thank you.

Sincerely, ..

A handwritten signature in black ink that reads "Todd Miller". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Todd Miller
Executive Director