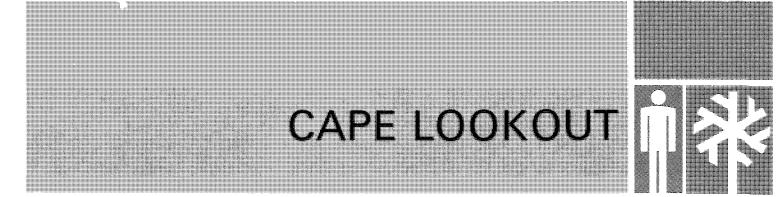
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final environmental impact statement general management plan / development concept plan december 1982



NATIONAL SEASHORE / NORTH CAROLINA

UNITED STATES DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE

FINAL ENVIRONMENTAL IMPACT STATEMENT on General Management Plan/Development Concept Plan

for

Cape Lookout National Seashore Carteret County, North Carolina

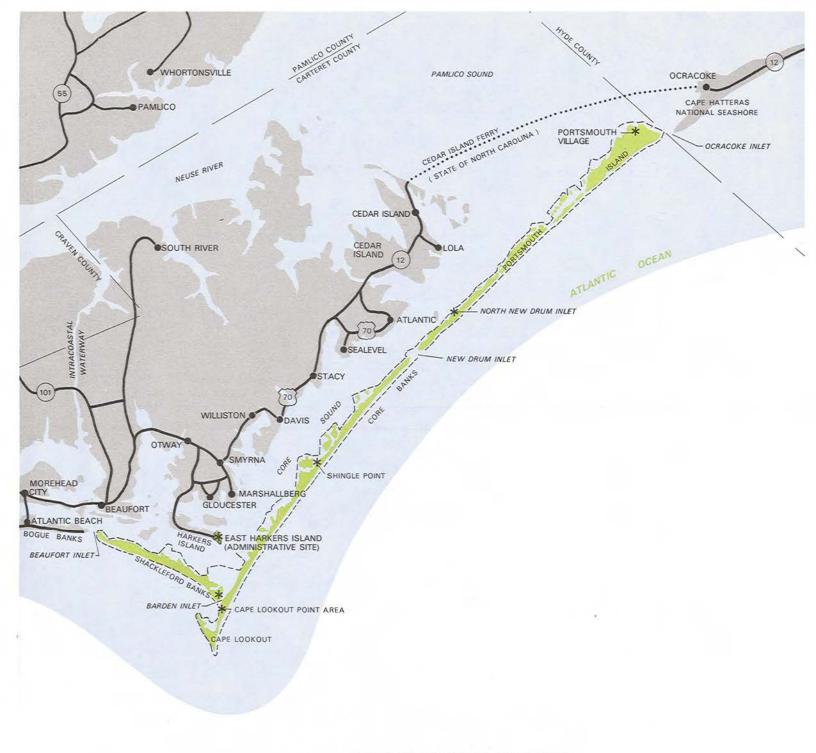
Abstract: Cape Lookout National Seashore is a 55-mile stretch of three virtually roadless and undeveloped islands. By contrast, the adjacent barrier islands are undergoing extensive commercial development. To meet visitor needs, ferryboat landings and overland public transportation at Cape Lookout Point will be provided along with development of the administrative site at the east end of Harkers Island, the gateway port. Private motorized vehicles will be allowed on Core Banks/Portsmouth Island, and private boats may land along the shoreline. For the foreseeable future, ferryboats like the ones presently in use will continue to follow "natural" channels and will continue to maintain them by "kicking-out." Maintenance dredging of ferryboat basins will be required periodically. Present outmoded cabins in the fish camps will be replaced with enclosed camping shelters. Special measures will be taken to protect the threatened Atlantic loggerhead turtle and other endangered species.

For further information contact:

Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, North Carolina 28516 Area Code 919/728-2121

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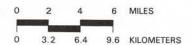
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CAPE LOOKOUT NATIONAL SEASHORE NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 20044B DSC OCT 82

SUMMARY

The accompanying document, titled <u>General Management Plan/Development Concept Plan</u> (GMP), is a synthesis of congressional and administrative policy, National Park Service (NPS) planning precepts, and public comment. When adopted, this plan will guide the management and public use of Cape Lookout National Seashore for the next 8-10 years. No aspect of the proposal is irreversible or irretrievable.

Basically, the status quo will continue, with development of an administrative site and construction of ferryboat docks at the island landing points proceeding as funds become available.

The unique natural values of the national seashore will not be compromised by the extensive development taking place on the other Outer Banks of North Carolina. The barrier islands of the national seashore will be managed mostly as a natural area, with the forces of nature continuing to shape the land and control the vegetation and animal life thereon. Special care will be taken to protect vegetation and animals, including the loggerhead turtle, from human activity that may be detrimental.

Most existing development will be removed; private vehicle use will be allowed; a public transportation system will be provided at Cape Lookout Point; public ferryboats will serve five landing points; historic resources will be preserved where feasible; and an administrative/public use/management facility will be established at the site on Harkers Island.

Visitors will have the opportunity to swim, surf, sunbathe, fish, hunt, go beachcombing, hike, camp, picnic, photograph, observe the wildlife, and get acquainted with the many facets of the cultural and natural environment, as they see fit. In addition to the ferries, visitors will come by private boat as they have in the past. Both the ferries and the on-island transportation system will enable those without their own boats and the handicapped to have greater access to the seashore.

National seashore visitors may use overnight accommodations on the mainland. New camping shelters will replace the outmoded fish camp cabins on the barrier islands at Shingle Point and North New Drum Inlet. There will also be primitive camping allowed throughout the seashore; backpackers will carry their own shelter and use the islands on their own terms. Motorized vehicle users will also be able to camp on Core Banks/Portsmouth Island at environmentally suitable places. Briefly, the plan may be characterized by limited development, limited on-island public transportation, ferryboat service from mainland to islands, and regulated private vehicle use.

The 1982 edition of the GMP is reflected in this <u>Final Environmental Impact Statement</u> (FEIS) as alternative 1. It is a modification of alternative 1 in the draft statement (DEIS) of May 1980. The changes were made by the NPS following public comments on and agency evaluation of the draft plan and statement received between August and December 1980.

Three other options for the management and use of the national seashore are discussed in this document.

Alternative 2, No Action: continuation of the present administrative and maintenance functions at Beaufort and visitor contact functions at Harkers Island; ferryboats to five landing points; on-island transportation at Cape Lookout Point only; retention of some cabins in the old fishing camps; continued use of private vehicles on the islands.

Alternative 3: consolidation of administrative/public use/management functions at Harkers Island; ferryboats serving six landing points; on-island transportation along the full length of Core Banks; private vehicle use from Cape Lookout to New Drum Inlet; construction of three modern cabin camps and five campgrounds on the barrier islands.

Alternative 4: use of the Harkers Island site as the base for the management and operation of the national seashore; ferryboats to four landing points; no private vehicles permitted; and no fish camp cabins on the barrier islands.

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I. PURPOSE OF AND NEED FOR ACTION

A. Overview

Public Law 93-477 dated October 26, 1974, required the secretary of the interior to develop a "final master plan for the full development of the seashore consistent with the preservation objectives of this Act, indicating--

- 1) the facilities needed to accommodate the health, safety, and recreation needs of the visiting public;
- 2) the location and estimated cost of all facilities; and
- 3) the projected need for any additional facilities within the seashore."

This same act stated that the secretary "shall review the area within the seashore and shall report to the President . . . his recommendations as to the suitability or nonsuitability of any area within the seashore for preservation as wilderness," in accordance with the provisions of the Wilderness Act (PL 88-577, dated September 3, 1964). The issue of wilderness will be evaluated in a forthcoming analysis. The area under wilderness consideration (Shackleford Banks) will be managed to preserve potential wilderness values until such time as the president makes a recommendation and Congress decides whether to designate wilderness at Cape Lookout National Seashore.

The original legislation (PL 89-366, dated March 10, 1966) authorized Cape Lookout National Seashore to be established "to preserve for public use and enjoyment an area in the state of North Carolina possessing outstanding natural and recreational values." (Refer to the Vicinity map.) Within the seashore the secretary of the interior was directed to "permit hunting and fishing, including shellfishing, on lands, marshlands, and water . . . in accordance with the laws of the State of North Carolina and the United States, to the extent applicable, except the Secretary may designate zones where, and establish periods when, no hunting or fishing shall be permitted for reasons of public safety, administration, fish or wildlife management, or public use and enjoyment." The law also provides for consultation with appropriate state officials before any special rules and regulations regarding hunting and fishing are put into effect. Additionally, the secretary was directed to "administer the Cape Lookout National Seashore for the general purposes of public outdoor recreation, including conservation of natural features contributing to public enjoyment." In doing so, the secretary "may utilize such statutory authorities relating to areas administered and supervised . . . through the National Park Service (NPS) and such statutory authorities otherwise available to him for the conservation and management of natural resources as he deems appropriate to carry out the purposes of this Act." Although section 6 of the law provides for the cooperation of the Corps of Engineers in "shore erosion control or beach protection measures," the secretary of the interior has presently elected to allow natural processes to continue unabated.

The seashore legislation of 1966 authorized establishment of an administrative site not to exceed 100 acres, and the legislation of 1974 referenced a map showing the site at east Harkers Island. A review of the process which led to the selection of this site is presented in appendix A.

The administration of Cape Lookout National Seashore is also guided by management objectives, which are listed in the accompanying GMP, and summarized below:

Resources management--to maintain the seashore in a natural condition, to conduct needed basic research, and to preserve significant historic resources wherever feasible

Visitor use and interpretation--to make seashore resources available and islands accessible to visitors, on foot or in vehicles, but with a limited impact on the environment, and to interpret the seashore with primary emphasis on the effects of the sea on the barrier islands

Development--to develop only those facilities on the Outer Banks that are essential to visitor use, safety, and resources management, and to provide major facilities at the mainland site

Public use of Core Banks/Portsmouth Island developed prior to and during the period of acquisition of the islands by the state of North Carolina. When title to most of this land passed to the United States in 1976, the area was littered with thousands of rusted, junk vehicles abandoned over the years by their owners where they broke down, and with a multiplicity of shanties, shacks, and associated debris. These structures had been used periodically by hunters and fishermen. (See the Existing Conditions map.) The process of removing junk vehicles, structures, and debris, begun by the state, is continuing.

In acquiring the land, both the state and NPS granted 25-year use and occupancy leases and life estates to some landowners. When these rights expire, the improvements on these tracts will be removed, except historic structures, and the land will revert to its natural condition.

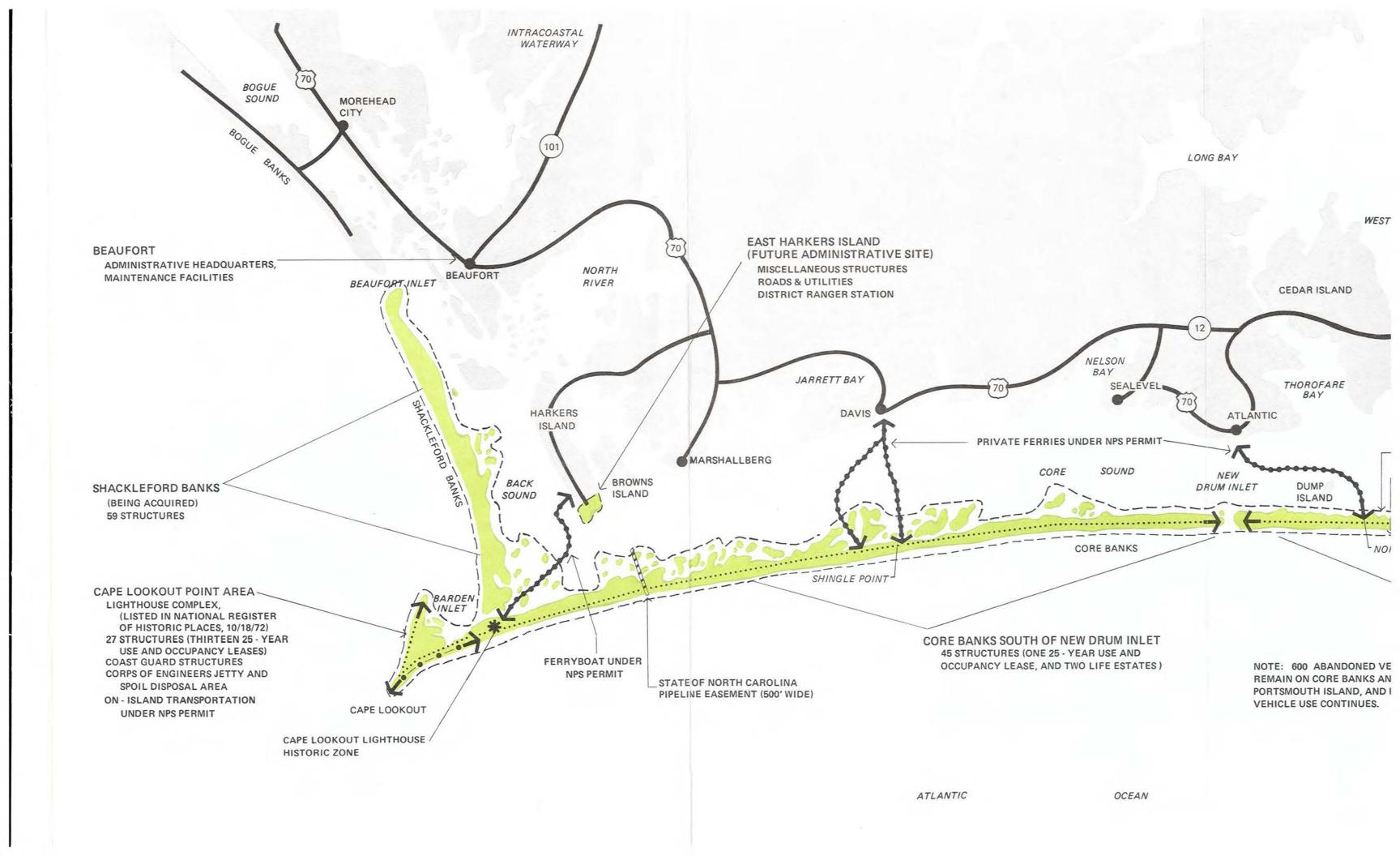
Over the past 30 years, people have been visiting the Cape Lookout lighthouse and Portsmouth Village, have patronized the fishing camps, and have fished, hunted, and beachcombed along the islands. The camps are at Shingle Point and North New Drum Inlet, both on Core Banks. Many people use their own motorized vehicles on Core Banks, transported one to three at a time on 30-foot-long, shallow-draft ferryboats, privately owned and operated.

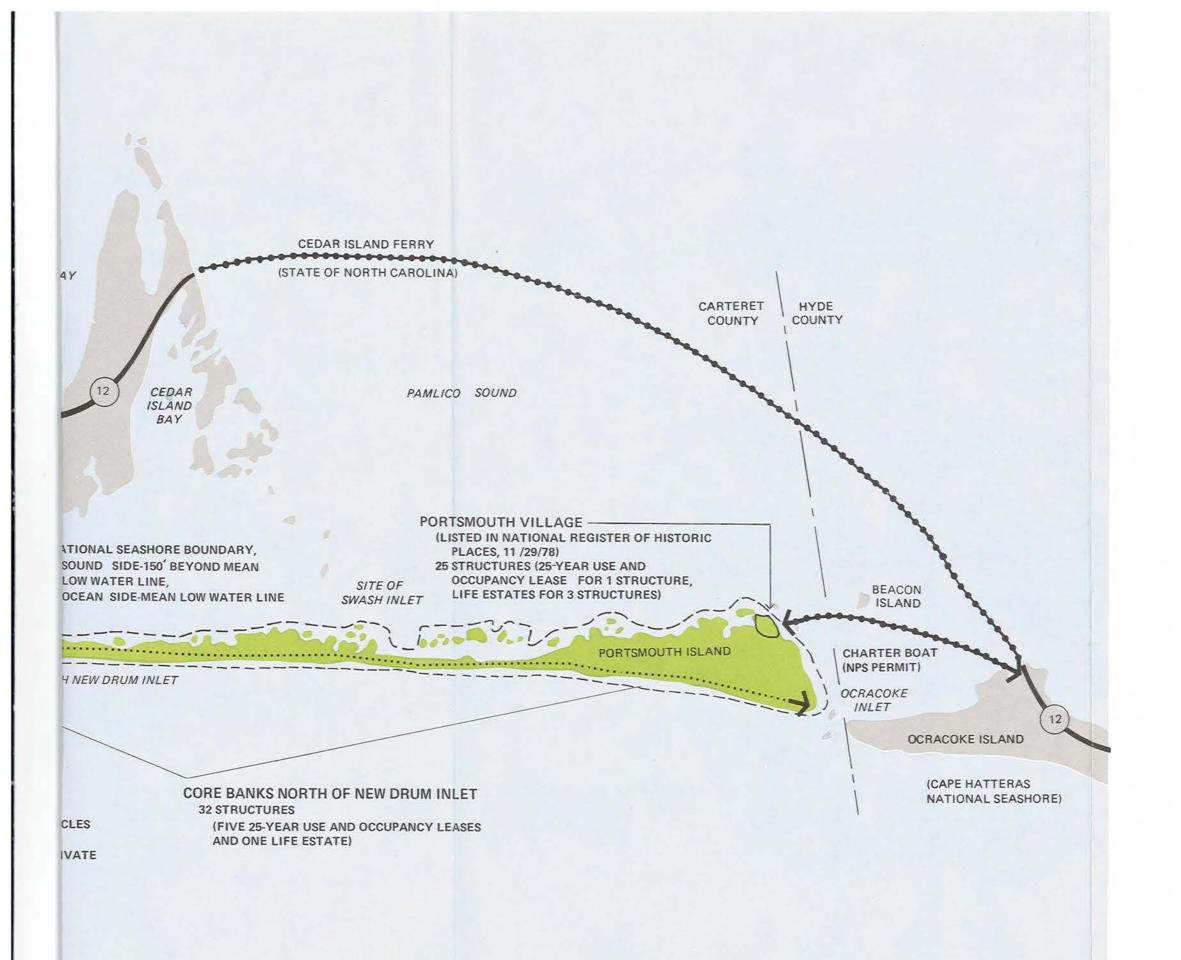
Occupants of private boats have landed at will along the shores of Core Banks/Portsmouth Island. On occasion, as high as 80% of the visitors have reached these barrier islands in their own boats.

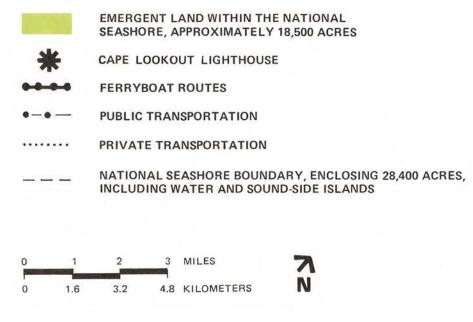
Shackleford Banks is privately owned, but acquisition by the United States (as authorized in the legislation) is underway. There are 59 structures on Shackleford Banks. On the sound side, there are favorite places heavily used by local people for picnicking, swimming, and shellfishing on weekends.

B. Compliance and Consistency Actions

The GMP and this accompanying FEIS were prepared in response to the legislation establishing the national seashore. These







EXISTING CONDITIONS

CAPE LOOKOUT NATIONAL SEASHORE / NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 20043E DSC Oct 82 documents also respond to other federal laws, executive orders, and state laws, as applicable, and reflect the consultation and coordination involved in their preparation.

Executive Orders 11644 and 11989 both address off-road vehicle use on public lands and call for an evaluation of the effects from that use. Vehicles may be allowed in a national seashore only if they will not adversely affect its natural, aesthetic, or scenic values (EO 11644). If it is determined that vehicle use will cause or is causing considerable adverse effects on the soils, vegetation, wildlife, wildlife habitat, or cultural or historical resources, the area is to be closed to vehicle use until the effects have been eliminated and measures to prevent future recurrence have been implemented (EO 11989).

In compliance with section 7 of the amended Endangered Species Act, the NPS has been in consultation with the U.S. Fish and Wildlife Service about the endangered and threatened species at Cape Lookout National Seashore. The Fish and Wildife Service concurs with the conclusions of the NPS "Biological Assessment" that the actions called for in the plan will not adversely affect the Atlantic loggerhead turtle, eastern brown pelican, or Arctic peregrine falcon, all federally listed endangered or threatened species (see letter in appendix B). The NPS has agreed to certain measures to protect nesting turtles.

Similarly, for compliance with section 106 of the National Historic Preservation Act, the state historic preservation officer of North Carolina has been consulted along with the Advisory Council on Historic Preservation (see memorandum of agreement in appendix B). The state historic preservation officer will be notified prior to any construction, dredging, or other ground disturbing activities within the national seashore, and will be given a chance to review and comment on plans for such activities.

Any proposal for development at the seashore will reflect the provisions of EO 11988 (Floodplain Management) and EO 11990 (Protection of Wetlands). Their similar purposes are to avoid adverse impacts associated with the modification of floodplains or wetlands, and to avoid new construction in these sensitive areas wherever there is a practicable alternative. Except for the highest dunes at Cape Lookout Point, all of the barrier islands in the national seashore are located within the 100-year floodplain and in the coastal high hazard area. There is therefore no alternative to locating development on the islands within these floodplains. At the administrative site on east Harkers Island, the 100-year floodplain and coastal high hazard area fringe the island. Where possible, development on east Harkers Island will avoid the coastal high New construction will be built to applicable standards, hazard area. except where minimal and expendable structures are a more appropriate means to reduce loss of investment. To minimize danger to life, the islands will be evacuated in the threat of a hurricane or major (See the "Statement of Findings" in appendix B). northeaster.

Permits required under section 10 of the Rivers and Harbors Act and section 404 of the Clean Water Act will be obtained from the U.S.

Army Corps of Engineers when the projects identified in the plan are designed. Projects requiring such permits include maintenance dredging, spoil disposal, and dock and marina construction.

According to the requirements of the Safe Drinking Water Act, the public water system for any proposed development will comply with all national primary drinking water regulations.

The proposal for the seashore includes some actions that will directly affect the North Carolina coastal zone. In accordance with the Coastal Zone Management Act, the NPS believes that its GMP is consistent with the North Carolina Coastal Management Program. Further evaluation will be conducted, as required, when appropriate detail is available for the design of the individual projects proposed in this plan.

The state has identified areas of environmental concern (AEC) within the national seashore, and associated policies and priorities for development. The proposed NPS use for each AEC, and the designated state priority for that use, are summarized below.

Area of Environmental Concern	Proposed NPS Use	State Priority for Use
Coastal wetlands	Primarily conservation	Highest
	Ferryboat docks and boardwalks at some sites to provide public access	Second
Estuarine waters	Primarily conservation	Highest
	Ferryboat docks at five locations, NPS dock at one location on barrier islands; marina on east Harkers Island; occasional maintenance dredging required to provide public access and recreation; dredge spoil deposit near lighthouse to prevent erosion	Second
Estuarine shorelines	Public access at selected sites for recreation with minor development related to public access	Highest
Ocean beaches	Public recreation with vehicles restricted to corridors where and when necessary to protect dunes and nesting birds and turtles; vehicles associated with recreational and administrative uses	Highest
Frontal dunes and ocean erodible area	Conservation (see ocean beaches with regard to vehicles)	Highest
Inlet lands	No development	Highest

II. ALTERNATIVES INCLUDING THE PROPOSED ACTION

A. Introduction

The congressional purpose in establishing Cape Lookout National Seashore is "to preserve for public use and enjoyment an area . . . possessing outstanding natural and recreational values." Hence, the alternatives provide varying degrees of protection of the resources while presenting a sliding scale of intensity of use and level of development. Neither the plan nor any of the alternatives denies the public the opportunity to hunt, fish, shellfish, swim, surf, sunbathe, beachcomb, hike, camp, picnic, photograph, observe wildlife, and enjoy the outdoors. However, the means by which the public will undertake these activities differ among the alternatives (see table 2 at the end of this section). As examples, the plan (alternative 1) provides for only primitive camping but would provide developed campgrounds; transportation service will be provided in the plan, but none would be provided in alternative 4.

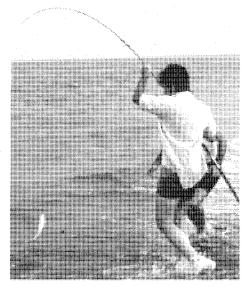
People will reach the islands by public ferryboats and by their own boats. The number of landing points and the level of development at each differ among the alternatives. The flood potential cannot be avoided for construction on the islands, but developments will be only the minimum to protect resources and visitors; structures will be expendable since their exposed locations subject them to severe storms. People will be evacuated from the islands when major storms are expected.

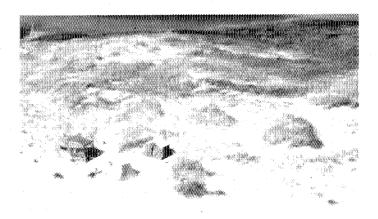
Reserved use and occupancy rights to land and structures will be honored until they expire. Then the improvements thereon, except historic structures, will be removed and the land will revert to its natural condition.

Basic research about coastal processes on barrier islands, natural washover/dune field systems, and plant and animal ecology will continue. In addition, the effects of visitor activities upon the barrier islands and on the endangered and threatened species will continue to be monitored to guide management directions.

To the greatest extent practical, Portsmouth Village (listed on the National Register of Historic Places) will be preserved as it appeared around the turn of the century, from which time the present buildings remain. (Today, three properties are subject to life estates, and one is under a 25-year lease.) Exteriors of the structures will be maintained along with the grounds and lanes surrounding them. The visitor will observe these on self-guiding tours through the village. Some structures will be used for interpretation, and visitors will be allowed to enter. The history of Portsmouth Village will be presented there, with an emphasis on the earlier years. The more recent history will be interpreted along the trails. The interior of some structures will be adapted for contemporary administrative functions.

Shoreline erosion at Barden Inlet, adjacent to the Cape Lookout lighthouse complex, had been accelerating during the winter of 1979-80 and threatening the lighthouse (owned by the Coast Guard) and the associated buildings (owned by the NPS). The rate of erosion decreased during the winter of 1980-81 when dredge spoil material was deposited by the Corps of Engineers in the water along the shore near the lighthouse,







Recreational uses of the national seashore include surf fishing, hiking, camping, and swimming.



and the shipping channel was shifted to the west. The Corps will continue to dump spoil offshore from the light station. As long as the buildings remain, they will be maintained and used in visitor interpretation programs.

As noted in the 1974 amendatory legislation (refer to the "Purpose of and Need for Action" section), the east Harkers Island location for the administrative site had already been determined at that time. However, there is an analysis of alternatives in appendix A of this FEIS.

NPS general management plans are organized under four major headings: management zoning (land classification), resources management, interpretation and visitor use, and general development. The scope of the FEIS includes analyses of the following issues contained in the general management plan for Cape Lookout National Seashore: (a) transportation on the barrier islands, (b) overnight shelter, (c) dredging, and (d) administrative site development.

For a description and maps of the barrier islands comprising the seashore and the surrounding region which will be discussed in the following alternatives, refer to the "Affected Environment" section.

B. Alternatives

1. Alternative 1: The Plan

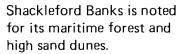
a. Overview

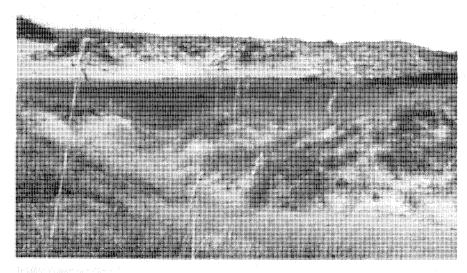
The GMP contains the following actions: development of the Harkers Island administrative site; minimum development on the islands at five ferryboat landing points, including 20 overnight camping shelters at both Shingle Point and North New Drum Inlet; provision of limited on-island public transportation service; and continuation of private vehicle use, where directed by management, on Core Banks/Portsmouth Island. (See the graphic, Alternative 1: The Plan.) Private boats may land along the shores. Most visitor activities will be beach oriented and most can take place anywhere on the 55 miles of shoreline.

On Shackleford Banks, travel will be on foot since no vehicle use will be allowed. Visitors will need to come prepared to use the area on its own terms. Private boat landings will be permissible anywhere not closed by management for the protection of the resources. Visitors may also arrive aboard passenger ferries which will dock at the east end of Shackleford Banks. One 2-acre enclave will be reserved for the ferryboat dock, an orientation sign, and management needs. It is likely that many visitors will spend a night on the island.

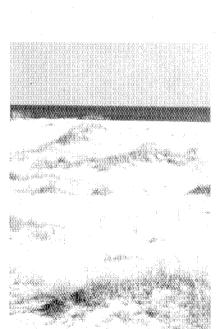
On Shackleford Banks (see the photographs of Shackleford Banks), the striking contrast between the open dunes and the canopied maritime forest offers an unusual opportunity for the visitor to "become lost" in a unique and undulating topography. However, from the west end of the island's sound side, the shipping facilities and the communities on the mainland are clearly visible. Along most of the island, one can discover the beauties of the coastal landscape and can feel a sense of remoteness and solitude. Many ships and pleasure boats pass offshore.







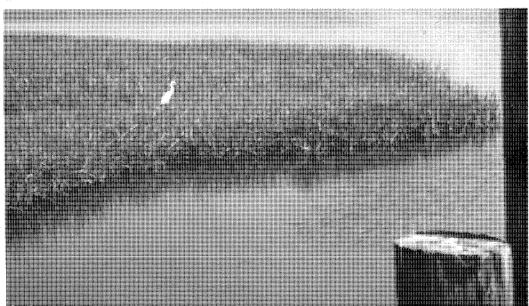








Core banks is a landscape dominated by sandy beaches, low dunes, vegetated sand flats, and marsh.



Shackleford Banks is privately owned, and acquisition by the United States is underway. When the land is purchased, structures and domestic livestock will be removed. However, some rights of use and occupancy of structures may continue for a time, and a representative number of horses will remain.

b. Transportation on the Barrier Islands

A concession-operated public transportation service will continue to operate over a 3-mile route between the lighthouse and Cape Lookout Point, a stretch of currently high visitor concentration. The vehicle will operate in a corridor to avoid interference with other visitors and to protect resources like dunes and vegetation. The corridor will shift seasonally so that nesting birds and sea turtles will not be harmed. If warranted, public transportation will be extended northward along the beach/berm.

vehicles will now, be allowed on Core Αs Banks/Portsmouth Island but not on Shackleford Banks. The NPS will continue to require a permit for each vehicle before it is transported to the islands. (Presently a valid state license plate and inspection sticker are necessary for the issuance of a permit, which is available by mail or in person without a fee). Ferryboat docks are provided at Shingle Point and North New Drum Inlet. It now costs \$50 round-trip to transport a vehicle to the islands. There will be restrictions to confine private vehicles to a corridor where necessary to avoid resource damage as explained previously for the public transportation service.

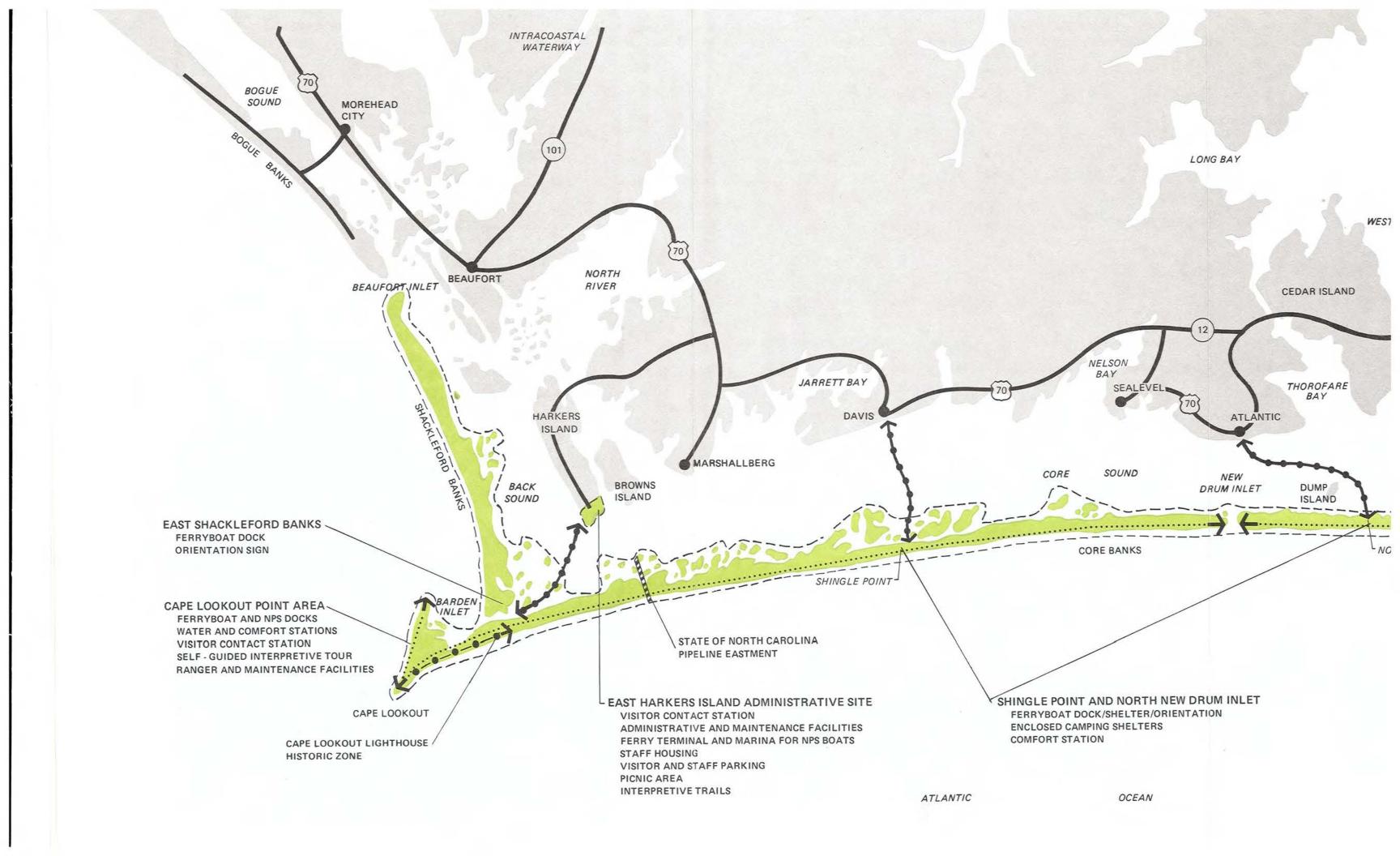
c. Overnight Shelter

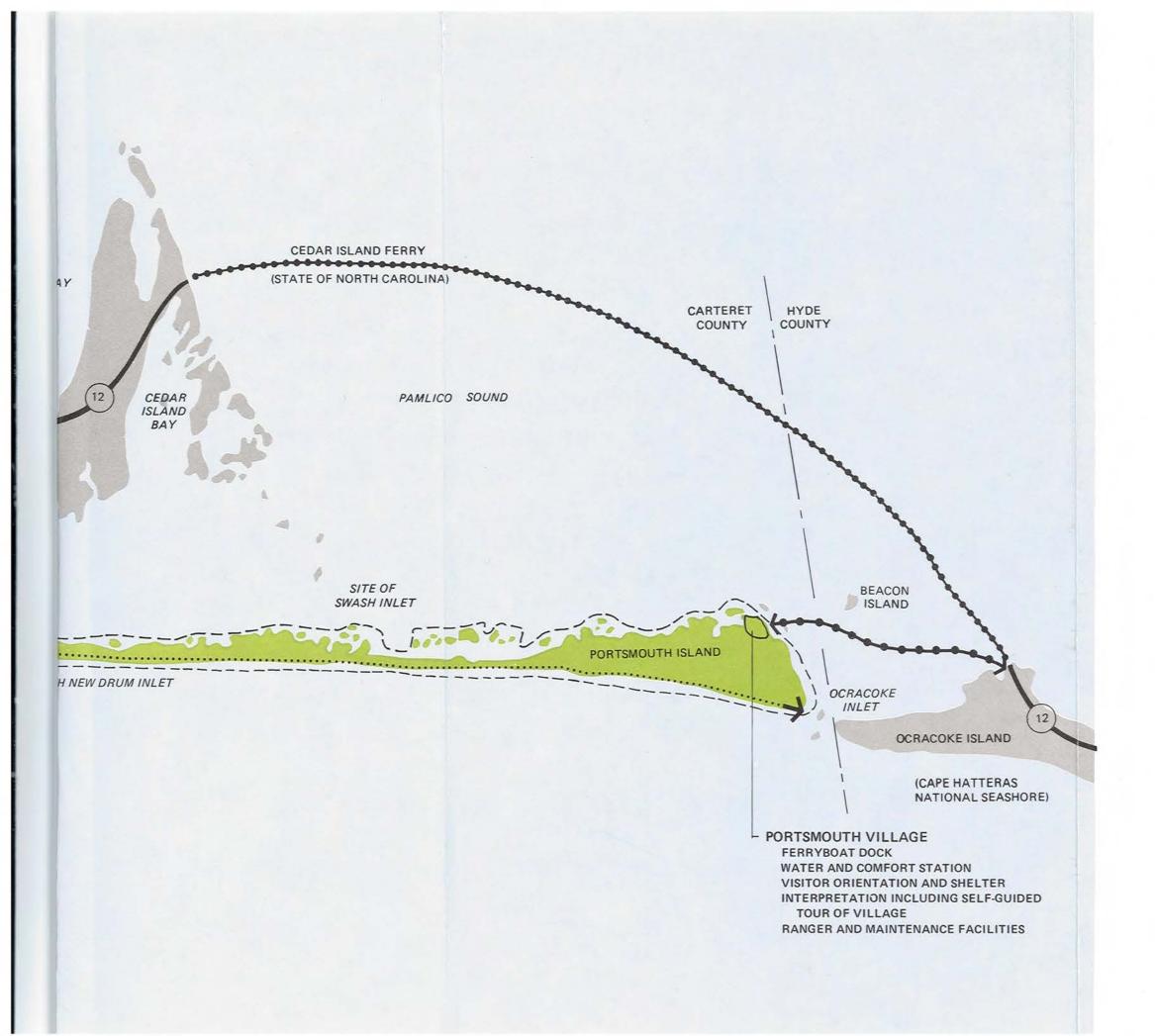
The existing fish camp cabins at Shingle Point and North New Drum Inlet will be removed. New enclosed camping shelters will be constructed. They will be designed by the NPS to be compatible with the barrier-island environment. There will be 20 units each at Shingle Point and North New Drum Inlet to accommodate up to 160 persons overnight, and they will be rented out by a concessioner. The shelters will protect the campers from the elements and from biting insects. Because of the storm hazard associated with their locations, the structures, although of sturdy construction, will be considered expendable, and the camps will be evacuated prior to any anticipated storm emergency. Both sites are within the coastal high hazard area.

Existing water sources at the two sites will be retained, and water will be made available to the public if Public Health Service standards can be met economically. Flush toilets will be provided in a central comfort station and it will have an approved sewage disposal system. The NPS Public Health Service consultant in the Atlanta regional office will monitor water quality and sanitation to ensure compliance with applicable federal and state laws and regulations.

d. Dredging

For the foreseeable future, ferryboats will continue to follow "natural" channels (maintained by propeller wash, or "kicking-out") to Shingle Point (approximately 9,500 feet) and North New Drum Inlet (approximately 4,500 feet) across Core Sound, and to Portsmouth Village (approximately 3,500 feet) across Ocracoke Inlet. (See the ferryboat





ACCESS - PUBLIC FERRYBOAT & PRIVATE BOAT

ON-ISLAND TRANSPORTATION — PUBLIC BETWEEN CAPE LOOKOUT LIGHTHOUSE AND CAPE POINT; PRIVATE ENTIRE LENGTH OF CORE BANKS/PORTSMOUTH ISLAND

DEVELOPMENT — FERRYBOAT DOCKS AT FIVE LANDING POINTS AND LIMITED FACILITIES FOR VISITOR USE, INCLUDING SHELTERS, SIGNS, AND COMFORT STATIONS AT FOUR LANDINGS. RANGER AND MAINTENANCE OPERATIONS AT CAPE LOOKOUT POINT AREA AND PORTSMOUTH VILLAGE. ADMINISTRATIVE SITE DEVELOPMENT AT HARKERS ISLAND

INTERPRETATION — MAJOR INTERPRETATION AT HARKERS ISLAND VISITOR CONTACT STATION.
ON-ISLAND INTERPRETATION RANGES FROM SELF DISCOVERY (NO FACILITIES) TO MINIMAL FACILITIES AND PROGRAMS (INTERPRETIVE SIGNS AND GUIDED TOURS) AT CAPE LOOKOUT POINT AREA AND PORTSMOUTH VILLAGE

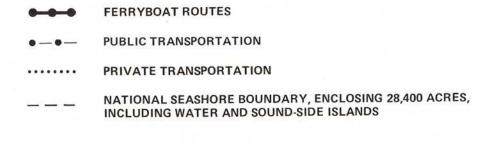
MANAGEMENT ZONING -

NATURAL ZONES: ENTIRE SEASHORE, WITH THE FOLLOWING EXCEPTIONS:

DEVELOPED ZONES: DEVELOPMENT AT EACH LANDING POINT OF PORTSMOUTH VILLAGE, NORTH NEW DRUM INLET, SHINGLE POINT, CAPE LOOKOUT, AND EAST SHACKLEFORD BANKS.

HISTORIC ZONES: CAPE LOOKOUT LIGHTHOUSE AND PORTSMOUTH VILLAGE

SPECIAL USE ZONES: STATE RESERVED PIPELINE EASEMENT, COAST GUARD FACILITIES, CORPS OF ENGINEERS JETTY AND SPOIL DISPOSAL AREAS, AND PRIVATE RIGHTS SUBZONES





ALTERNATIVE 1: THE PLAN

CAPE LOOKOUT NATIONAL SEASHORE / NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 | 20038D DSC | Oct 82 routes on the graphic titled Alternative 1: The Plan.) The boats presently used are shallow-draft vessels up to 30 feet long, and they carry from 6 to 50 passengers; some carry up to three vehicles. Boats like these have followed these same channels for several decades. There will be periodic maintenance dredging required at the docking sites provided on the barrier islands of the park. However, this dredging requirement is not expected to be frequent or extensive.

The marina on the south side of the administrative site at Harkers Island and its connection (approximately 700 feet) to the ship channel in Back Sound have silted in. The marina and its channel will be dredged so that the ferryboats and NPS maintenance/patrol boats can operate from it to Cape Lookout Point and other places on the barrier islands. In addition to dredging, the NPS marina may require a breakwater. Docks and piers will be constructed. All will be part of the comprehensive design to be prepared after the GMP is approved.

Each dredging project for ferryboat operation will be separately designed, including plans for disposal of spoil material. Then the plans will be coordinated with the state of North Carolina (which has jurisdiction over the affected public trust water and submerged lands on the sound side 150 feet beyond mean low water), and the NPS will apply to the Army Corps of Engineers for the section 10/404 permits. These procedures ensure that an adequate design has been prepared and that the public interest is met.

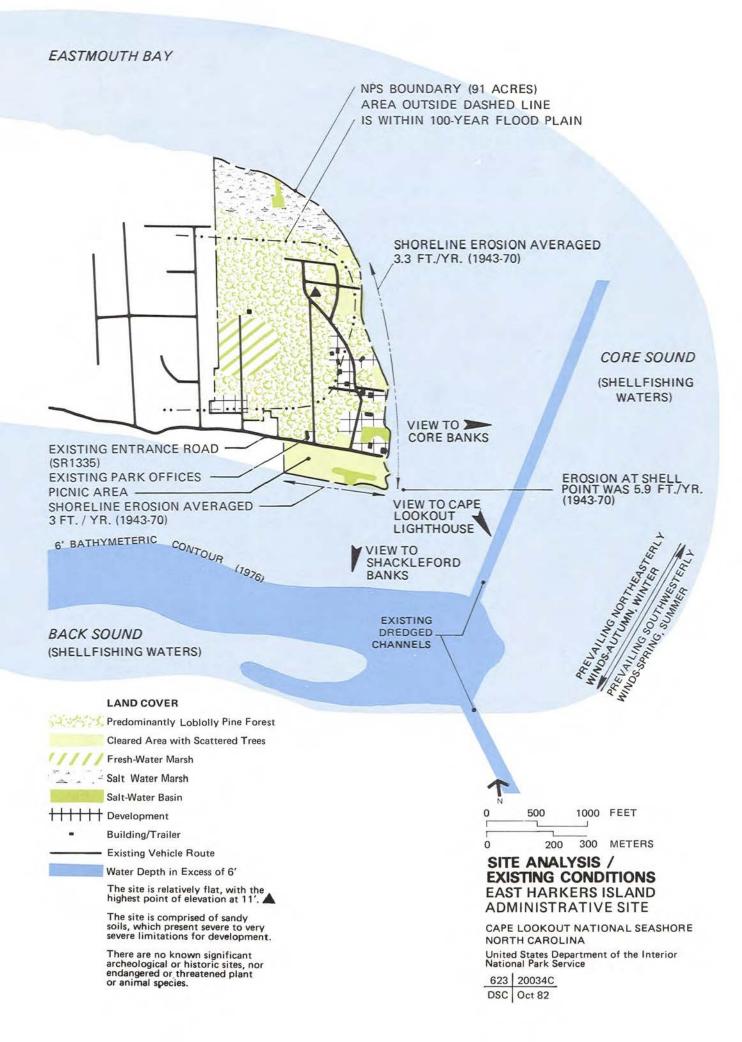
e. Administrative Site

The 91 acres comprising the administrative site and gateway port on east Harkers Island have been acquired. This action was recommended by the Congress in 1976 (PL 93-477). (See appendix A for a discussion of other locations for the administrative site.)

Of the east Harkers Island site, 18.2 acres are wetlands and 43.9 acres are in the 100-year floodplain. (See the map, Administrative Site: Site Analysis/Existing Conditions.) Most of the site is buildable, although there are constraints for all the soils present (USDA, SCS, 1977). Development in the floodplain and wetlands will be avoided to the extent practicable. A total of 44 acres will be developed at this site as specified below.

Under the plan, this site will be used as the principal gateway port for visitors boarding ferryboats to the south end of Core Banks and to Shackleford Banks. (See the map, Administrative Site: Development Concept Plan.) Here will be a parking lot for visitors' vehicles, ferryboat terminal, visitor contact station, picnic area, comfort station, and interpretive trails—all designed for use by the handicapped.

Additionally, the area will contain a boat basin large enough for the ferry terminal and for NPS maintenance and patrol boats; an inland fenced maintenance compound with boat storage facilities, mechanical repair shop, and warehouse; an office building for the superintendent and administrative/management staff; and a residence for a ranger and eight apartments for seasonal personnel to provide an onsite security and protection presence (in accordance with Bureau of the



A INTERPRETIVE TRAIL (Design for Handicapped, B EMPLOYEE HOUSING (1 ea. single family unit, 2 ea. four-plexes) PARK OFFICES (2,500 Sq. Ft.) MAINTENANCE FACILITIES (3,000 Sq. Ft.) STAFF PARKING (20 Spaces) ALTERNATIVE ENTRANCE / -D PICNIC AREA (25 Sites, 1 Comfort Station, LOOP ROAD (1 Mile) Parking - Design for Handicapped) VISITOR CONTACT STATION (2,500 Sq. Ft.) VISITOR PARKING (80 Cars + 20 Oversized) PEDESTRIAN AREA CONNECTING PARKING WITH VISITOR CONTACT STATION & MARINA F MARINA FOR FERRY & MAINTENANCE BOATS **G** OBLITERATE EXISTING BOAT BASIN CORE SOUND **EXISTING ENTRANCE ROAD** (SR 1335) CONTOUR (1976) 6' BATHYMETERIC BACK SOUND PASSENGER FERRYBOAT TO CAPE LOOKOUT POINT AREA AND LAND COVER EAST SHACKLEFORD BANKS (3.3 Miles) Predominantly Loblolly Pine Forest Cleared Area with Scattered Trees ///// Fresh-Water Marsh - Salt Water Marsh Salt-Water Basin 500 1000 FEET The Development Building/Trailer 200 300 METERS **Existing Vehicle Route** DEVELOPMENT Water Depth in Excess of 6' CONCEPT PLAN EAST HARKERS ISLAND ADMINISTRATIVE SITE CAPE LOOKOUT NATIONAL SEASHORE NORTH CAROLINA United States Department of the Interior National Park Service

EASTMOUTH BAY

DEVELOPMENT ZONES

623 | 20035D DSC | Oct 82 Budget regulations). Other personnel, both permanent and seasonal, will reside in nearby communities, as presently.

Electricity will be purchased from the Harkers Island Electric Membership Corporation, and water will be supplied by the Harkers Island Water and Sewage Corporation. If that firm constructs a central sewage system, which is under discussion, the NPS will connect to the system. Without this, the NPS will treat its own sewage at a level to meet federal and state standards. Existing septic tank/leach field systems will be monitored, and if found to be polluting the surrounding shellfish waters will be removed from the NPS site.

If necessary and desirable in the future, opening and paving a road parallel to SR 1335 to the north consisting of Mullens Drive, Shackleford Road, and Middle Bay View Drive could be undertaken. (See the map, Locations Considered for Administrative Site, in appendix A.) These streets, now mostly unpaved, serve developing subdivisions, boatyards, cemeteries, a church, and a water pumping station. This north-side road would enter the northwest side of the NPS site, and then the entry from SR 1335 could be closed. The NPS will pursue this matter with local, county, and state governments, but the north approach road would be built by the county or state.

2. Alternative 2: No Action

a. Overview

No action means continuing the present operation and use with minor improvements. (See the map, Alternative 2: No Action.) The administrative offices and maintenance facilities would remain in Beaufort, whereas the Harkers Island site would have only minimal development. There would be no facilities on Shackleford Banks. Present minimal ferryboat service to five landing points on the barrier islands would continue. Private vehicle use would also continue along Core Banks/Portsmouth Island, and a public transport vehicle would operate only at the Cape Lookout Point area. Altogether, for most visitors, there would be little opportunity to conveniently see more than a small area near the lighthouse by means other than walking.

b. Transportation on the Barrier Islands

Public transportation and private vehicle use would be the same as described in alternative 1. However, the possibility of extending public transportation north of the Cape Lookout Point area would be foregone.

c. Overnight Shelter

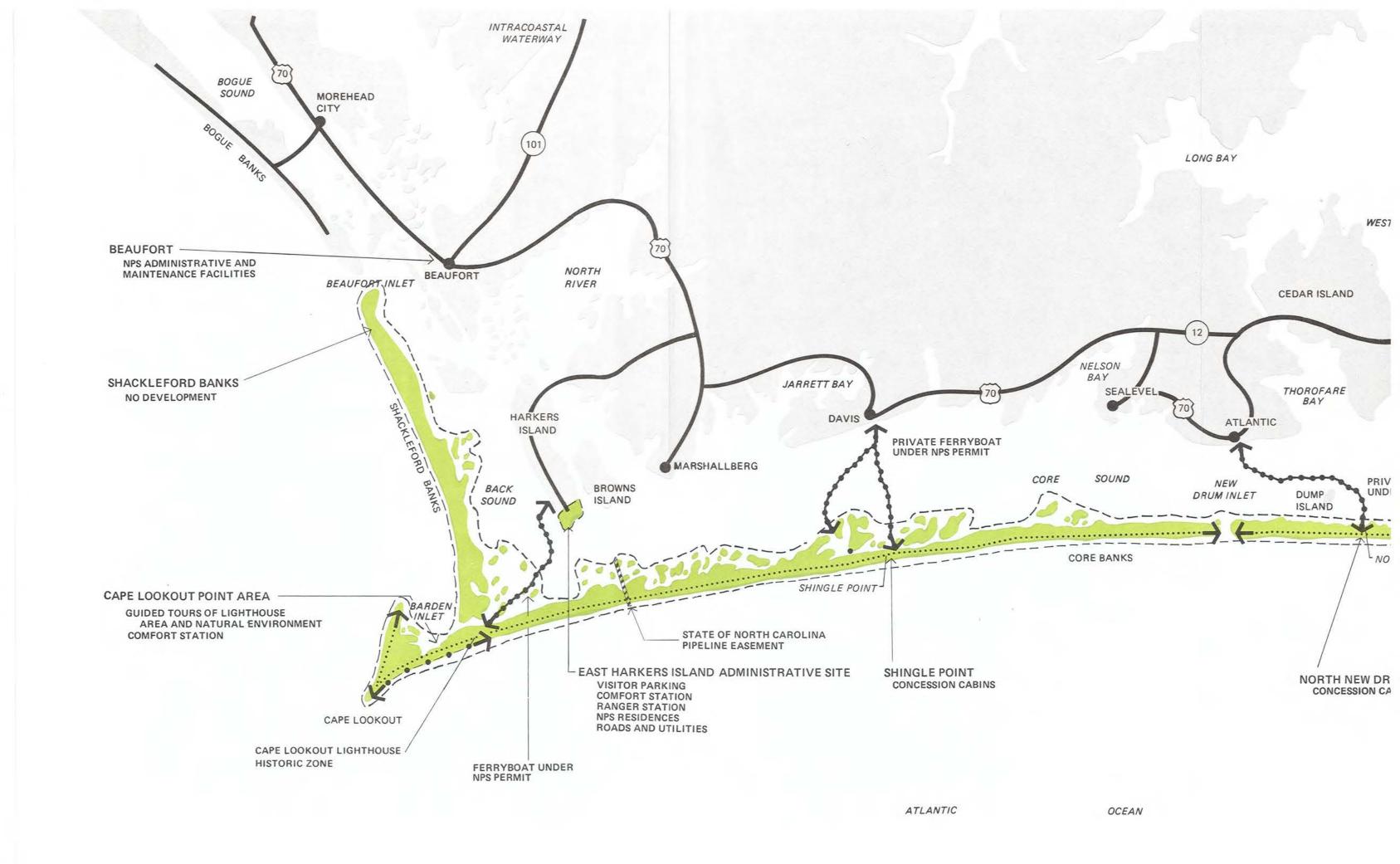
Some rental cabins at the old fishing camps (in the vicinity of Shingle Point and North New Drum Inlet) would continue to be operated as overnight accommodations.

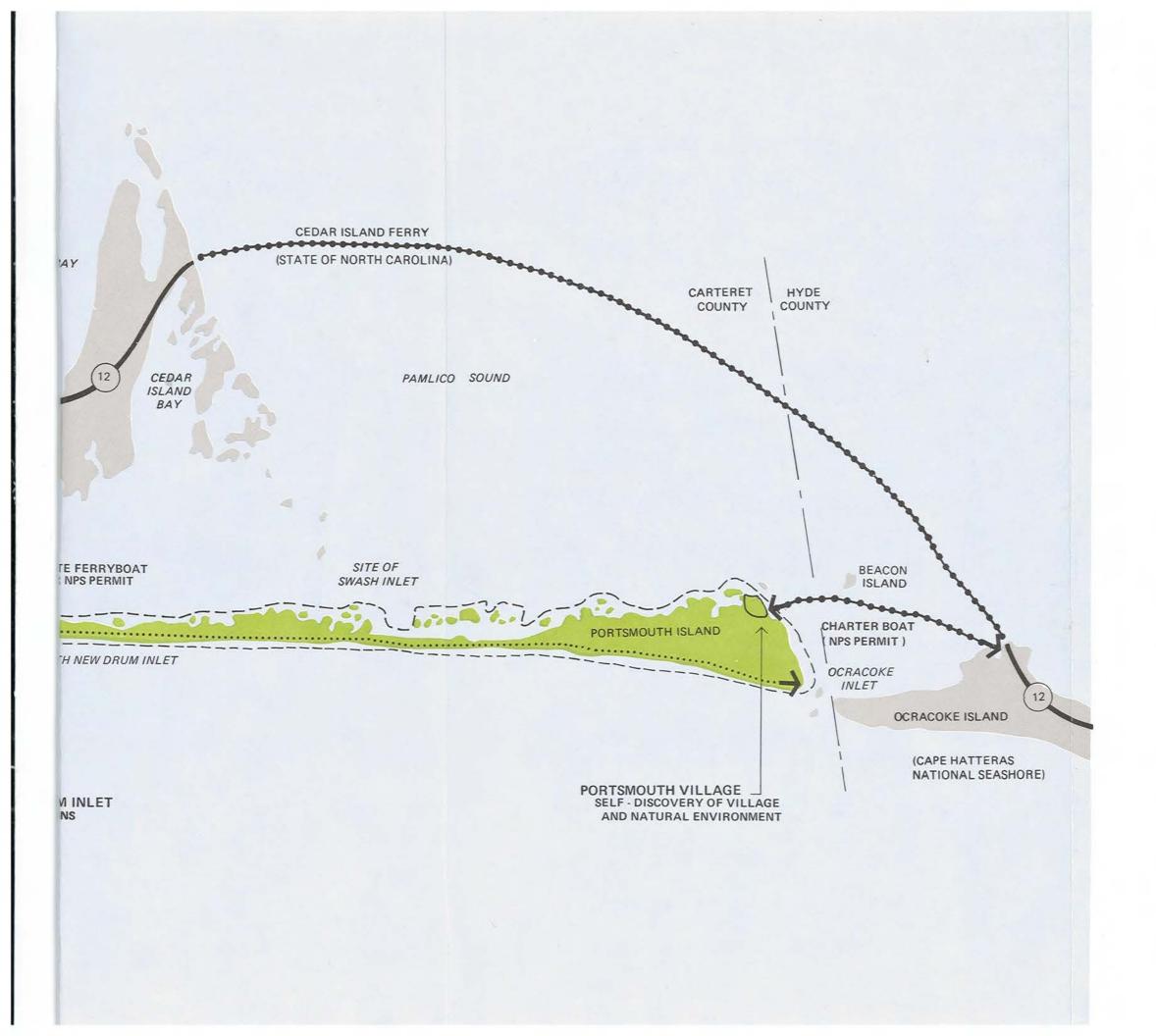
d. Dredging

Same as alternative 1.

e. Administrative Site

The east Harkers Island site would contain only minimal development, primarily for visitor contact, at a distance of 18





ACCESS — LIMITED OVERWATER PUBLIC TRANSPORTATION. ON-ISLAND TRANSPORTATION: PUBLIC FROM LIGHTHOUSE TO CAPE LOOKOUT POINT, PRIVATE ENTIRE LENGTH OF CORE BANKS AND PORTSMOUTH ISLAND

DEVELOPMENT — EXISTING FACILITIES AT FISH CAMPS. OVERNIGHT USE OF SOME EXISTING CABINS AND BACKPACK CAMPING. COMFORT STATIONS. VISITORS CARRY IN WATER. FERRYBOAT DEPARTURE POINT AT HARKERS ISLAND

INTERPRETATION — SEASHORE ORIENTATION AND SPECIAL PROGRAMS AT HARKERS ISLAND AND IN LOCAL COMMUNITIES. ON-ISLAND ORIENTATION INCLUDES GUIDED WALKS

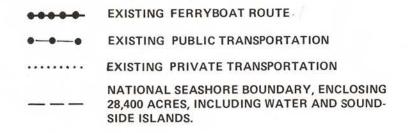
MANAGEMENT ZONING -

NATURAL ZONE: ENTIRE SEASHORE WITH THE FOLLOWING EXCEPTIONS:

DEVELOPED ZONES: EXISTING DEVELOPMENT AT LANDING POINTS OF PORTSMOUTH VILLAGE, NORTH NEW DRUM INLET, SHINGLE POINT, AND CAPE LOOKOUT.

HISTORIC ZONES: CAPE LOOKOUT LIGHTHOUSE AND PORTSMOUTH VILLAGE

SPECIAL USE ZONES: STATE RESERVED PIPELINE EASEMENT, COAST GUARD FACILITIES, CORPS OF ENGINEERS JETTY AND SPOIL DISPOSAL AREAS, AND PRIVATE RIGHTS SUBZONES







ALTERNATIVE 2: NO ACTION

CAPE LOOKOUT NATIONAL SEASHORE / NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 | 20039D DSC | Oct 82 road miles from the administrative and maintenance operations in Beaufort. Development would be limited to a ferryboat departure point, parking spaces for 100 visitors' cars, comfort stations, limited staff residences, and a ranger station. Water and electricity would be purchased from the local company and the existing sewage systems (septic tanks with drain fields which meet present-day standards) would be used initially.

3. Alternative 3

a. Overview

This alternative emphasizes development of recreational facilities and operation of an extensive transportation service to and on the islands. (See the map, Alternative 3). This alternative is similar to the Environmental Assessment's alternative 2. There would be five public campgrounds and three concession camps with overnight cabin accommodations and concession stores. Six ferry landing points would be developed, an on-beach transportation system would operate the entire length of Core Banks and Portsmouth Island (46 miles), and private vehicles could be used from New Drum Inlet south to Cape Lookout Point and around the bight (25 miles). Overall, recreational use would be intensive.

At Shackleford Banks, there would be two ferry landing points on the Back Sound shoreline. Campgrounds would be at these points. The additional landing point would be centrally located, 3 miles east of the one on the west end and farther removed from the industrialized mainland at Morehead City. It would provide direct access into the center of the island.

b. Transportation On the Barrier Islands

The public transportation service would operate the full length of Core Banks/Portsmouth Island (46 miles) except that transportation north of New Drum Inlet would be provided only during the major fishing seasons of spring and fall. Visitors could board or leave at any point along the islands or at the four ferry landings--Cape Lookout Point, Shingle Point, North New Drum Inlet, and Portsmouth Village. Private vehicles with permits would be allowed to operate along 25 miles between New Drum Inlet and Cape Lookout Point. Both the transport and private vehicles would be confined to a corridor similar to that described in alternative 1.

c. Overnight Shelter

At the earliest practical time, the existing cabins in the fishing camps at North New Drum Inlet and Shingle Point would be removed, and these camps would be rebuilt. Another camp, with modern flood-proofed cabins, potable water supply, and sanitation, would be added in the Cape Lookout Point area. There would also be a convenience-type store at each fishing camp, and public campgrounds would be nearby. These facilities would have to be built in the coastal floodplain; they would be designed to be of moderate cost and expendable under extreme storm conditions.

d. Dredging

The dredging of ferryboat channels is summarized in table 2. The quantities given represent the "worst-case" situation for

environmental analysis. The dredged channels would be only as wide and as deep as necessary to accommodate the largest ferryboat to be used in each channel. Dredged channels would cross sandy bottom areas, thus avoiding eelgrass beds in the sound. Where there are major currents, the channels would be dredged parallel to them rather than perpendicular to them (which would cause sediments to fill in and require more frequent maintenance dredging). The dredge spoils would be handled through one or a combination of different techniques. These include depositing them on high and dry land, piping them across the barrier islands for deposit onto the beach or into the swash zone, or building sand-bag retaining dikes in the sound and creating dredge spoil islands. Wetlands would be avoided. The dredging operations would be done during the period of least critical biological activity in the sound and on the beach.

Table 1: Approximate Dreding Requirements For Alternative 3*

<u>Location</u>		<u>Linear Feet</u>	<u>Cubic Yards</u>
East Harkers Island		700	4,000
West Shackleford Banks		0	0
Wade Shore		2,000	19,000
East Shackleford Banks		0	0
Cape Lookout Point Area		300	6,000
Shingle Point		15,000	116,000
North New Drum Inlet		5,300	70,000
Portsmouth Village		2,000	33,000
· ·	Totals	25,300	248,000

^{*}Calculations based on a channel depth of 6 feet, bottom width of 75 feet, and a side slope of 1 vertical to 3 horizontal.

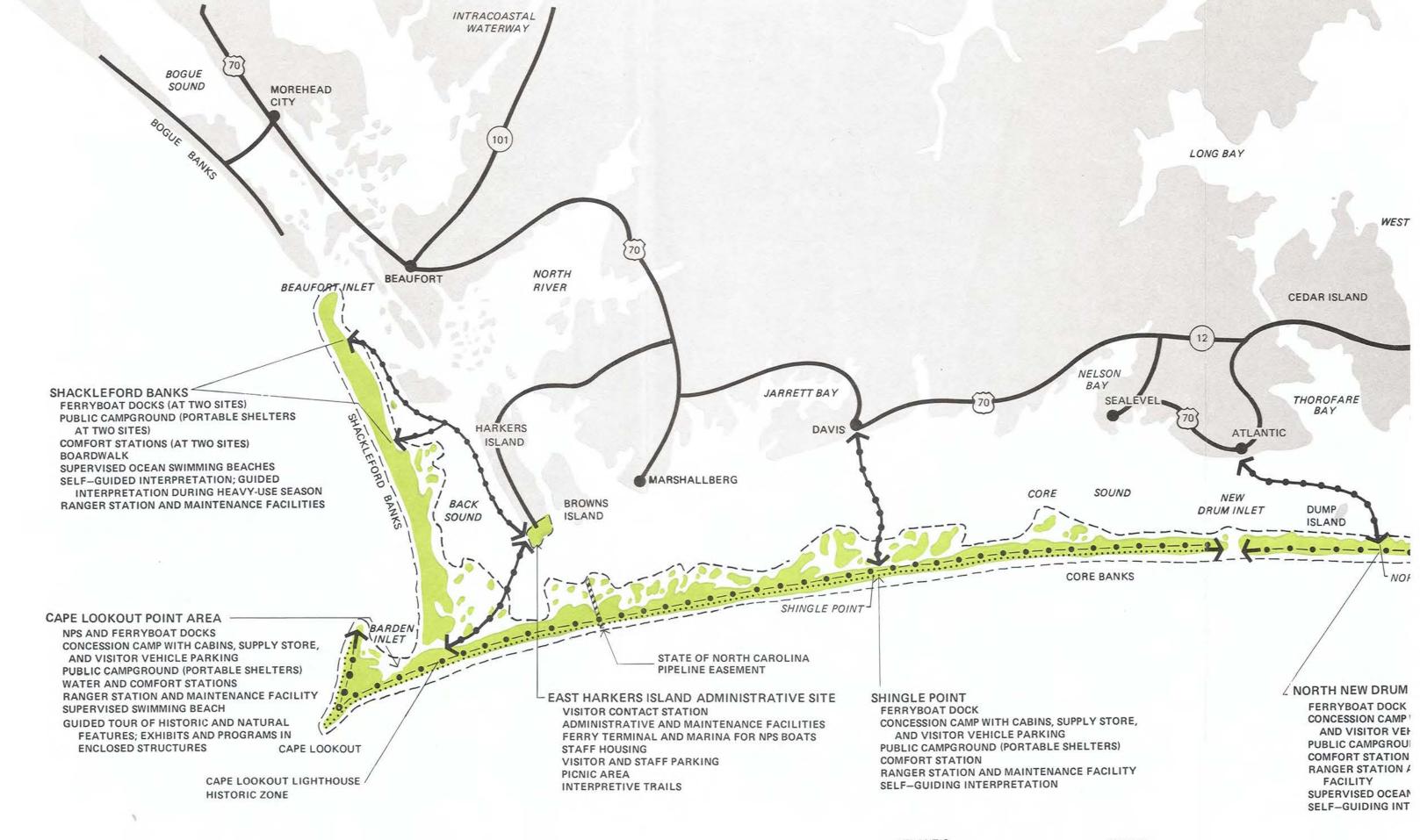
e. Administrative Site

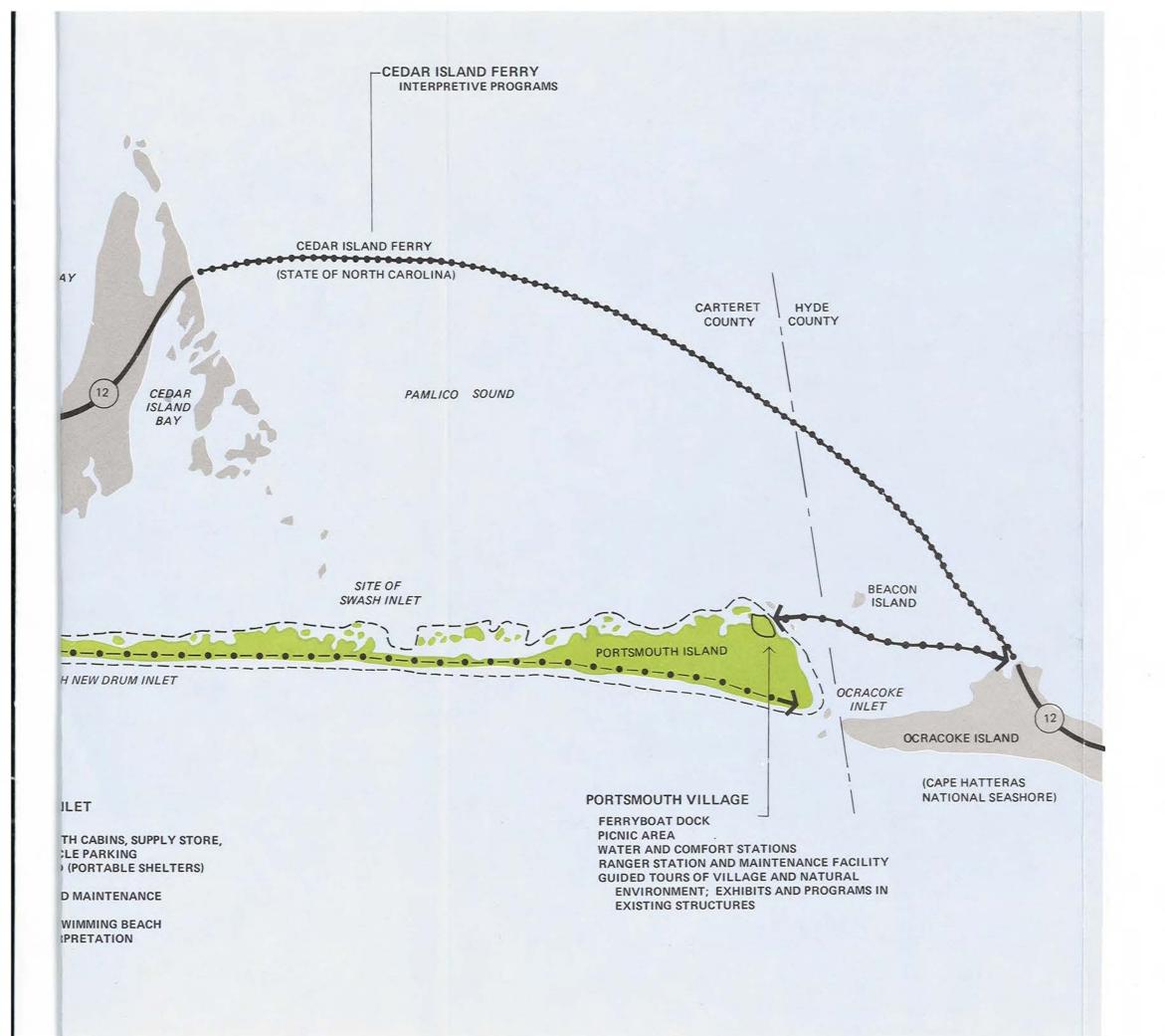
Development at east Harkers Island would be the same as described under alternative 1, but a greater number of visitors would be served. More visitor parking spaces, a larger ferryboat dock, and a larger visitor contact station would be built.

4. Alternative 4

a. Overview

There would be no on-island transportation service and no use of private vehicles on the barrier islands. (Refer to the map, Alternative 4.) People would reach the islands by ferryboat to four landing points--West Shackleford Banks, Cape Lookout Point, Shingle Point, and Portsmouth Village--requiring the same dredged channels previously described. Simple water and sewage systems would be provided at the landings. The seashore would revert to a natural, undisturbed state, and solitude would prevail. Visitors would carry their own gear, and there would be opportunities for backcountry and unconfined recreation.





ACCESS — OVERWATER PUBLIC TRANSPORTATION TO SEVERAL ISLAND POINTS (SCHEDULED SERVICE). ON-ISLAND TRANSPORTATION: PUBLIC BETWEEN CAPE LOOKOUT AND SOUTH SIDE OF NEW DRUM INLET AND BETWEEN NORTH SIDE OF NEW DRUM INLET AND PORTSMOUTH VILLAGE DURING SEASON, PRIVATE BETWEEN CAPE LOOKOUT POINT AND SOUTH SIDE OF NEW DRUM INLET

DEVELOPMENT — FACILITIES TO SUPPORT A WIDE RANGE OF ACTIVITIES: OVERNIGHT USE OF CONCESSION CABINS, PUBLIC CAMPGROUNDS (PORTABLE SHELTERS), AND BACKPACK CAMPING. SUPPORT FACILITIES FOR WATER AND SANITATION. CONCESSION STORE. INTERPRETATION, RANGER, AND MAINTENANCE OPERATION. ADMINISTRATIVE SITE DEVELOPED AT HARKERS ISLAND

INTERPRETATION — MAJOR INTERPRETATION AT HARKERS ISLAND VISITOR CONTACT STATION. ON-ISLAND INTERPRETATION RANGES FROM SELF DISCOVERY (NO FACILITIES) TO GUIDED TOURS. INTERPRETIVE EXHIBITS, AND SMALL VISITOR CONTACT STATIONS AT HISTORIC SITES

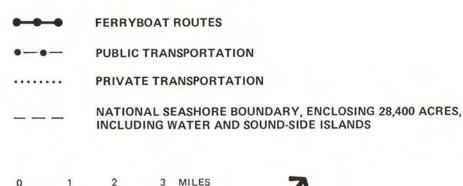
MANAGEMENT ZONING -

NATURAL ZONES: ENTIRE SEASHORE, WITH THE FOLLOWING EXCEPTIONS:

DEVELOPED ZONES: DEVELOPMENT AT EACH LANDING POINT OF PORTSMOUTH VILLAGE, NORTH NEW DRUM INLET, SHINGLE POINT, CAPE LOOKOUT, AND SHACKLEFORD BANKS (2 SITES).

HISTORIC ZONES: CAPE LOOKOUT LIGHTHOUSE AND PORTSMOUTH VILLAGE

SPECIAL USE ZONES: STATE RESERVED PIPELINE EASEMENT, COAST GUARD FACILITIES, CORPS OF ENGINEERS JETTY AND SPOIL DISPOSAL AREAS, AND PRIVATE RIGHTS SUBZONES



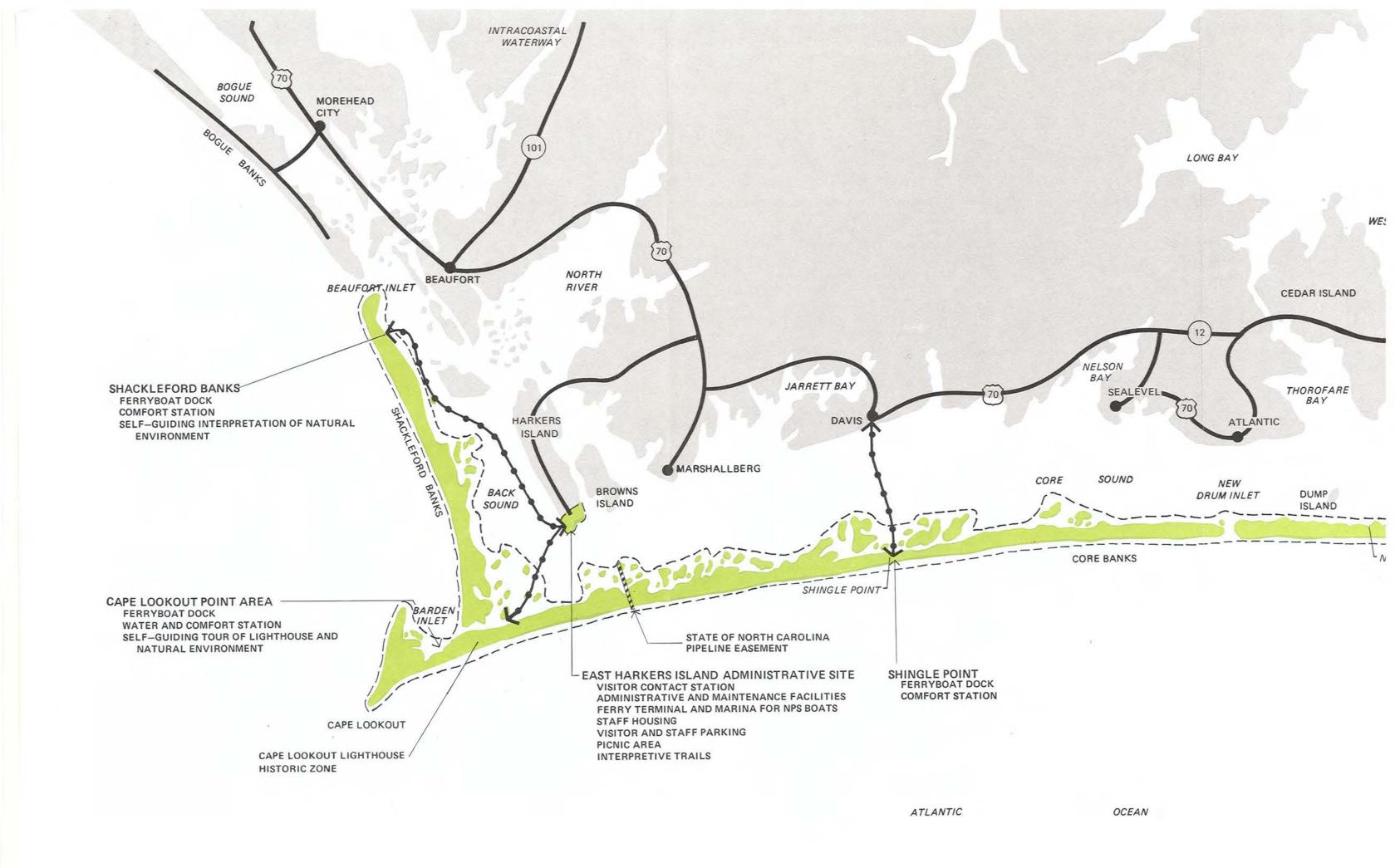


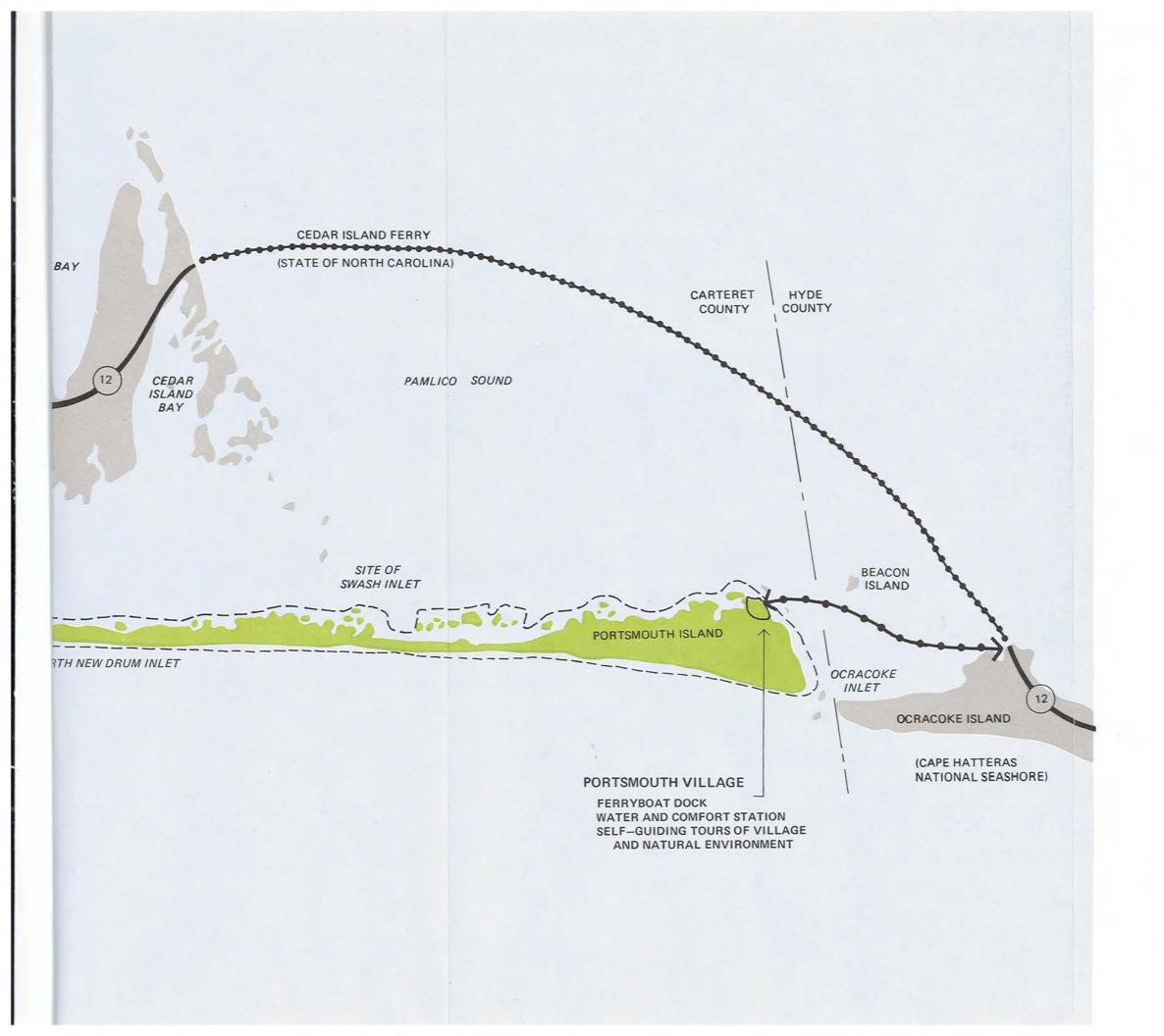


ALTERNATIVE 3

CAPE LOOKOUT NATIONAL SEASHORE / NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 | 20040D DSC | Oct 82





ACCESS — LIMITED OVERWATER PUBLIC TRANSPORTATION. NO ON-ISLAND TRANSPORTATION

DEVELOPMENT: MINIMAL FACILITIES FOR WATER AND SANITATION ONLY. CONVENIENCES LIMITED TO THOSE CARRIED IN BY VISITORS. ADMINISTRATIVE SITE DEVELOPED AT HARKERS ISLAND

INTERPRETATION — MAJOR INTERPRETATION AT HARKERS ISLAND VISITOR CONTACT STATION. ON-ISLAND INTERPRETATION THROUGH SELF DISCOVERY (NO FACILITIES OR PROGRAMS)

MANAGEMENT ZONING -

NATURAL ZONES: ENTIRE SEASHORE WITH THE FOLLOWING EXCEPTIONS:

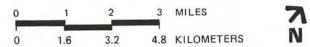
DEVELOPED ZONES: DEVELOPMENT AT EACH LANDING POINT OF PORTSMOUTH VILLAGE, SHINGLE POINT, CAPE LOOKOUT, AND SHACKLEFORD BANKS

HISTORIC ZONES: CAPE LOOKOUT LIGHTHOUSE AND PORTSMOUTH VILLAGE

SPECIAL USE ZONES: STATE RESERVED PIPELINE EASEMENT, COAST GUARD FACILITIES, CORPS OF ENGINEERS JETTY AND SPOIL DISPOSAL AREAS, AND PRIVATE RIGHTS SUBZONES

FERRYBOAT ROUTES

__ _ _ NATIONAL SEASHORE BOUNDARY, ENCLOSING 28,400 ACRES, INCLUDING WATER AND SOUND-SIDE ISLANDS



ALTERNATIVE 4

CAPE LOOKOUT NATIONAL SEASHORE / NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 | 20041D DSC | Oct 82 Signs of man's past occupancy and use--buildings, junk automobiles, and debris--would be removed, requiring motorized equipment for the cleanup effort. Then storm action--wind, waves, rain, and overwash--would erase the remaining evidence of man's activities, and plant regeneration would reestablish a natural vegetative cover.

The southern portion of Core Banks would be representative of washover barrier islands in an unaltered state (once the environment recovered) including dune fields, overwash fans, tidal deltas, and other barrier-island features. Among the outstanding natural features are the maritime forest called Guthries Hammock, which is undisturbed by man, and the high dune fields at Cape Lookout Point. There are also good examples of other woodlands, marshes, and maritime grasslands.

Visitor activities would continue much as in the past except for those dependent on vehicular transportation. This would not be allowed either for the public or park management, although an emergency could constitute an exception.

b. Transportation On the Barrier Islands There would be none at all.

c. Overnight Shelter

No enclosed shelters or cabins would be built and those now in existence would be removed.

d. <u>Dredging</u>
Access to four landing points would be required as described in alternative 1.

e. Administrative Site
All of the development listed under alternative 1
would be constructed, but the fewest people of any alternative would be
served. Therefore, the size of the facilities would be reduced.

C. Impact Comparison
The impacts that have been identified in table 3 are discussed in the "Environmental Consequences" section. A relative level of impact is estimated in table 3 for each alternative. Impacts are quantified, when possible, in the "Environmental Consequences" section. Both beneficial and adverse effects are included in the comparison and later impact discussions.

Generally, the impacts associated with alternative 1 lie in between those of the two extreme alternatives (3 and 4). The proposal will provide for a moderate number of visitors who will produce tourist trade affecting Harkers Island and the Carteret County region. Dredging will disturb the immediate sound environment. Dredging is expected to be minimal under alternatives 1, 2, and 4, but maximum under alternative 3. Resources management will result in recovery and maintenance of natural terrain, plant cover, animal habitat, and landscape scenery. On Core Banks/Portsmouth Island, for alternatives 1, 2, and 3, vehicle tracks will be visible in the corridors of use.

TABLE 2: COMPARISON OF ALTERNATIVE ACTIONS

	1		***************************************	*********		····	2	۱L٦	E	R۱	IA ⁻	TIVE 3	N	UN	1B	ER			4					
SITE	The Plan	Shackleford Banks	Cape Lookout Point	Shingle Point	North New Drum Inlet	Portsmouth Village		Cape Lookout Point	Shingle Point	North New Drum Inlet	Portsmouth Village	3	West Shackleford Banks	Wade Shore	Cape Lookout Point	Shingle Point	North New Drum Inlet	Portsmouth Village		Shackleford Banks	Cape Lookout Point	Shingle Point	North New Drum Inlet	Portsmouth Village
Access Ferry Landing Points On-Island Transportation: Public System (Miles) Private Vehicle Use (Miles)	5 3 46	•	•	•	•	◆	4 3 46	•	•	•	•	6 46 25	•	•	•	•	•	•	4 0 0	*	•	•		*
Development On-Island Ferryboat Docks Concession Camps Campgrounds Picnic Areas Confort Station Boardwalks (if necessary) Ranger Station and Maintenance Facility Supervised Swimming Beach Interpretive Structures	5 2 0 4 1 2	•	• •	* *	*	*	4 2 0 0 1 0 0	*	•	*	♦	6 3 5 1 6 2 5 3 2	· · · · ·	*	* * * * * * * * *	* * * *	* * * * *	* * * *	4 0 0 0 3 0 0	•	*	*		*
Harkers Island Visitor Contact Station Administrative Facility Maintenance Facility Ferryboat Terminal Visitor Parking Picnic Area and Trail Housing Land Classification	Yes Yes Yes Yes Yes Yes Yes						Yes Yes Yes					Yes Yes Yes Yes Yes							Yes Yes Yes Yes Yes					
Natural Zone (%) *Developed Zone (%) Historic Zone (%) Special Use Zone (%) Preservation of Historic Structures Exterior Control Natural Processes Adaptation of Interior	97.6 0.4 1.5 0.5 Yes No Yes	•	• • • • • • • • • • • • • • • • • • •	•	•	* * * * * * * * * * * * * * * * * * *	97.6 0.4 1.5 0.5	*	•	•	**	97.5. 0.5 1.5 0.5 Yes	•	•	* * * *	•	•	* • •	97.6 0.4 1.5 0.5 No	•	•	→	*	• •

Key: (%) = Percentage is based on total emergent seashore land of 18,491 acres.

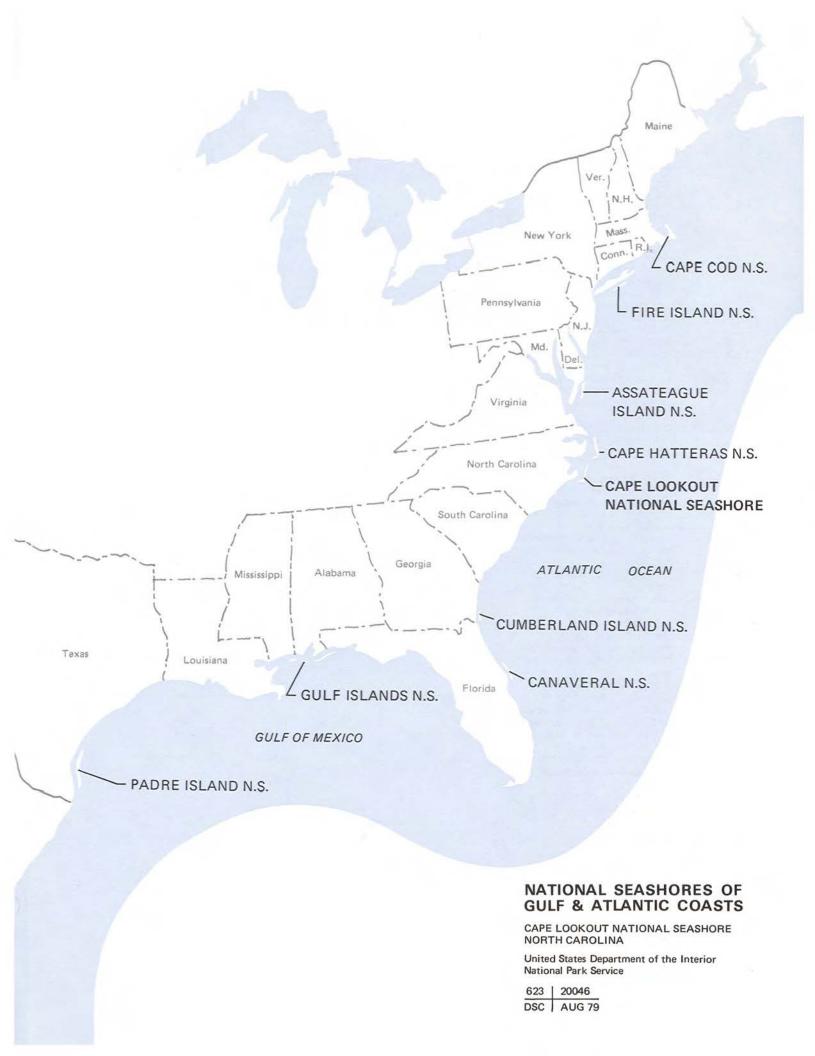
= Feature appears at given site.

← = Extent of area or zone affected.

* = Includes 44 acres on east Harkers Island.

Table 3: Impact Comparison

			Alternative 1 The Plan	Alternative 2 No Action	Alternative 3	Alternative 4
Α.	qml	acts on Harkers Island				
		the Region				
	1.	Visitor traffic	Moderate	Low	High	Low
	2.	Vistior tourist trade	Moderate	Low	High	Low
	3.	Changes in sport			22	WA. 4
		fishing	None	None	Low	High
	4.	Land-use changes	None	Low	High	Low
	5.	Changes in local		LACKSON.		Visionatina
	2	tradition	Moderate	Low	High	Low
	6.	Improvement of water	• • book on a sale		Tours	1000
	-	quality	Moderate	Moderate	Low	High Low
	7.	Scenic values	Low	Low	High	LOW
В.		acts on Physical ironment				
	1.	Dredging and disposal				
		of bottom sediments	Low	Low	High	Low
	2.	Recovery and maintenance	LOW	LUW	111911	Lon
	۵.	of natural washover barrier				
		island	Low	Low	Low	High
C.	Imp	acts on Vegetation				3
	1.	Recovery and maintenance				
	3.3	of natural barrier-island				
		plant cover	Low	Low	Low	High
	2.	Disturbance of submarine				
		and marsh vegetation	Low	Moderate	High	Moderate
	3.	Destruction of vegetation				
		in developed zones	Low	Moderate	High	Low
D.		acts on Animals				
	1.	Restoration and maintenance				
		of natural barrier island		4.2	1.207	Link
	2	habitats	Low	Low	Low	High
	2.	Disruption of marine animals	Moderate	Moderate	High	Low
	3.	Disturbance of animals	Moderate	Moderate	nigit	LOW
	3.	in transportation				
		corridor	Moderate	Moderate	High	None
Ε.	Imp	acts on Scenic Quality	model atc	model ate	9	115.15
	1.	Restoration of the natural				
	100.00	barrier-island landscape				
		scene	Moderate	Moderate	Low	High
	2.	Appearance of transport				3-
		corridor wheel tracks	Moderate	Moderate	High	Low
F.	Imp	acts on Cultural Resources				
	1.	Intrusion of development	Low	Low	High	Low
	2.	Concentration of visitors	Low	Low	High	Low
G.		acts on Seashore Use			and the second	George State
	1.	On-island transportation	Low	Low	Low	Moderate
	2.	Changes in overnight	TW 2-200	× 4.00×23×2		11:
		use	Low	Low	Low	High
	3.	Changes in recreational	18/04/03		14-4-9-4-	High
		opportunities	Low	Low	Moderate	High



III. AFFECTED ENVIRONMENT

A. Overview

The three barrier islands of Cape Lookout National Seashore are long, low, narrow strips of sand that are separated from the mainland of Carteret County, North Carolina, by broad shallow sounds. These 55 miles of islands are just a small part of the physiographic and ecological continuum of barrier islands which fringe the Atlantic and Gulf coasts of the United States and of which over 400 miles are managed by the NPS. (See the map, National Seashores of the Gulf and Atlantic Coasts.) Also associated with Cape Lookout National Seashore is a 91-acre portion of Harkers Island, which has been acquired for administrative headquarters and support facilities.

The seashore's islands of Portsmouth Island, Core Banks, and Shackleford Banks extend from Ocracoke Inlet to Beaufort Inlet. They are adjacent to the islands of Cape Hatteras National Seashore on the northeast and Bogue Banks on the southwest; all of these barrier islands are known as the Outer Banks of North Carolina. (Refer to map, The Region and Developed Zones of North Carolina's Outer Banks.) Of the 308 miles of barrier island ocean shoreline in North Carolina, Cape Lookout National Seashore represents 87% of the miles in public ownership which are without road access or are roadless. In contrast, bridges span from the mainland to the islands of Cape Hatteras National Seashore and Bogue Banks, and highways line these islands. The roads serve villages containing dwellings for the permanent and seasonal populations, stores, motels, and restaurants. Cape Lookout National Seashore is relatively pristine, but there are a few cabins scattered along the islands.

The area of the national seashore is 28,400 acres, including the 91-acre administrative site on Harkers Island. More than one-third of the total seashore acreage is comprised of small scattered islands on the sound side of Shackleford Banks and Core Banks/Portsmouth Island and of the nearshore water surrounding the barrier islands. The emergent land of the barrier islands proper totals 18,400 acres.

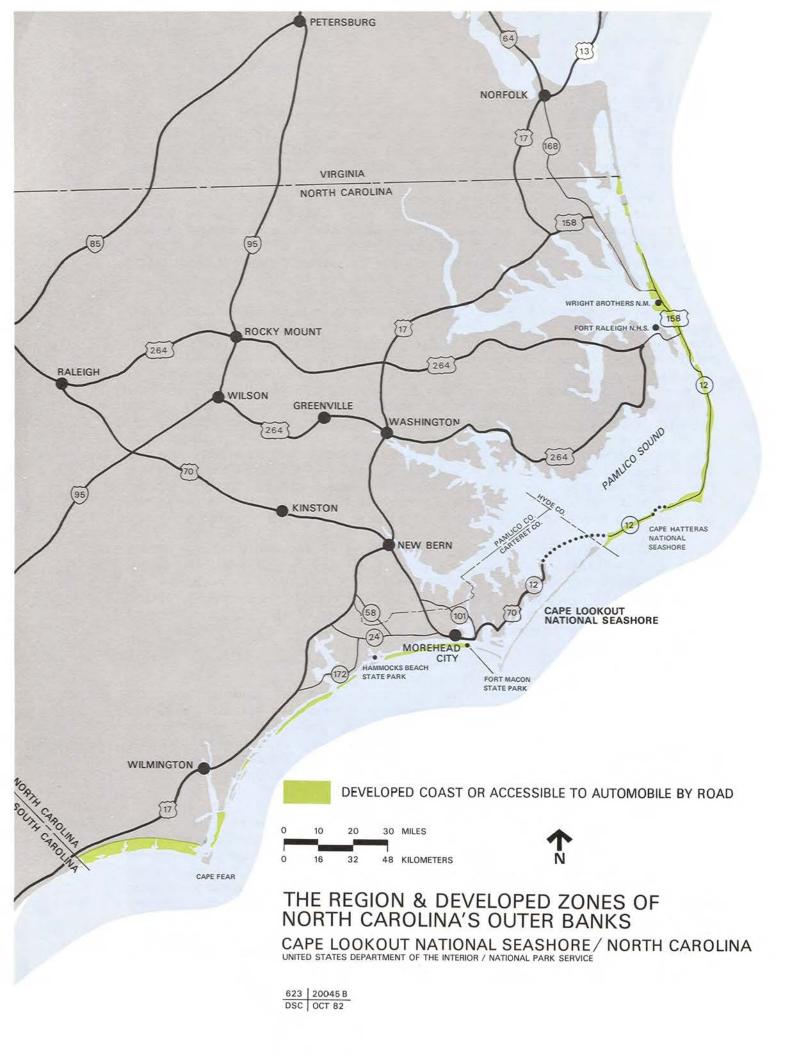
B. The Region

1. Access

A highway system connects Carteret County with the metropolitan populations of North Carolina and adjoining states; US 70 and 17 and North Carolina highways 101, 58, 24, and 12 lead into Carteret County. Most visitors arrive by automobile, although limited bus and airline services into Beaufort are also available. An increasing number of visitors enter the area by boat along the Intracoastal Waterway.

2. Socioeconomic Environment

Carteret County, in which the national seashore is located, is part of the relatively undeveloped coastal plain of North Carolina. (See the map, The Region and Developed Zones of North Carolina's Outer Banks.) The area is generally characterized as low, flat, tidewater country, and its predominantly rural population has traditionally been dependent on farming and commercial fishing. In recent years, tourism, construction trades, real estate, and finance are becoming increasingly important in regional development (North Carolina Coastal Resources Commission, 1978, p. 9). The seashore environment is and will continue to be a primary attraction for the region.



Several small communities combine with the rural population to give Carteret County 36,000 residents. This population is expected to increase 26% by 1985, coupled with a significant growth in seasonal population. Bogue Banks, with a tourist/resort orientation, is the major center of this growth.

The economy of Carteret County has diversified in recent years, with nonmanufacturing and public administration jobs increasing most rapidly. Commercial fishing continues as a major economic factor. In 1973, the county boasted 45% of the state fish landings, including the principal species of croaker, flounder, sea trout, spot, blue crab, shrimp, and menhaden. Much of the fishing activity centers around Morehead City, Beaufort, and the eastern sound-side communities of Island, Sealevel, Davis, Atlantic, and Cedar Boatbuilding is another traditional economic activity in these communities. With the North Carolina State Port Terminal in Morehead City, ocean shipping is also an important industry. A bulk coal-loading facility was The recent increase in regional marine resources added in 1980. development has been causing expansion of nearby governmental and university research facilities. Several major military installations in the region also contribute significantly to the local economy. Tourism is big business, accounting for approximately one-half of the total 1972 sales in the county, and it is growing steadily (North Carolina Coastal Resources Commission, 1978, p. 12). The mild weather and diversity of the seashore's attractions create a favorable environment for visitor-related enterprises.

3. Recreational Opportunities

The seashore environment of the region is the primary attraction, and an impressive variety of recreational experiences is available. Water-oriented activities include sport fishing from boats and piers, recreational boating, swimming, surfing, and scuba diving. Head boats, charter boats, and rental boats are available for deep-sea fishing. There are also facilities for launching and anchoring private boats. Picnicking is permitted in numerous public parks along the beaches and on the mainland. Visitors can view birds and game in the wildlife refuges. Elsewhere in the region, hunting of waterfowl and upland game Historic sites and marine museums during the fall. abound--the historic towns of Beaufort, New Bern, Bath, and Belhaven; Fort Macon State Park; Wright Brothers National Memorial; Fort Raleigh National Historic Site; the Hampton Mariners Museum in Beaufort; the Marine Resources Center in Pine Knolls Shore; and others. Art galleries, gift shops, golf courses, tennis courts, and seafood restaurants are numerous.

Most overnight accommodations in Carteret County are located on Bogue Banks, which is intensively developed with motels, condominiums, summer homes, restaurants, curio shops, shopping centers, and amusement areas. Some modest facilities and services are available in the eastern part of the county at Harkers Island, Davis, Sealevel, Atlantic, and Cedar Island. Carteret County also has several public and private drive-in campgrounds, and there is drive-in camping on the barrier islands of the adjacent Cape Hatteras National Seashore.

4. Federal, Regional, State, and Local Land-Use Plans, Policies, and Controls

The population, economy, current land uses and estimated future demands for the region of Cape Lookout National Seashore are detailed in the <u>Carteret County Land Use Plan</u>, which is part of the North Carolina Coastal Management Program (North Carolina Coastal Resources Commission, 1978.) This plan serves as a basis for managing natural resources and directing desirable future growth. Of the 340,000 land acres in the county, 8,000 acres are urban or built up; 90,000 acres in the county are federal. The desire to retain the present character of the county is reflected in the plan. The population increase anticipated on Bogue Banks will create new demands for water and sewer, electricity and telephones, roads, schools, and other services.

The policies of the Coastal Management Program, which are of concern in managing the national seashore, were discussed in the "Compliance and Consistency Actions" section. In particular, areas of environmental concern (AEC), which are part of the North Carolina Coastal Management Program, are identified for the national seashore and are related to proposed NPS use and state priority for each use.

C. The National Seashore

1. Natural Environment

a. The Barrier Islands

The barrier islands that comprise Cape Lookout National Seashore (see the Existing Conditions map) support various species of small animals and a variety of vegetation ranging from salt marsh grasses to shrubs and trees. The width of the islands ranges from 600 feet to 1-3/4 miles.

Core Banks/Portsmouth Island has a generally low profile, with the highest dunes seldom exceeding 10 feet (except near Cape Lookout Point). The topography of Shackleford Banks is more varied and generally higher, with dunes reaching an elevation of 35 feet. While artificially stabilized dunes border the sea on most of North Carolina's other barrier islands, most dunes on Cape Lookout National Seashore are unique, not having been disturbed by man. Additionally, this seashore's islands are among the most geologically dynamic of all the barrier islands. Except for the tallest dunes on Shackleford Banks and Cape Lookout Point, all of the seashore lands on the barrier islands are within the 100-year floodplain and in the coastal high hazard area. The coastal fringes of east Harkers Island are also in the 100-year floodplain and coastal high hazard area. The stillwater surge associated with a 100-year magnitude storm (1% probability of occurrence in a given year) is approximately 9 to 10 feet above mean sea level (FEMA, FIA, 1980). Waves break on top of this surge; where the depth of water (stillwater surge minus land elevation) is 3 feet or greater, waves will occur. The lands subjected to this wave action are considered coastal high hazard areas (FEMA, FIA, 1981). The wave height depends on the land elevation: water depth x 1.55 = wave crest height. For example, where the island elevation is 5 feet above mean sea level, such as at Shingle Point and North New Drum Inlet, the site would be subjected to 5 feet of water depth from stillwater surge and another 8 feet from breaking waves, for a total of 13 feet of flood waters above ground level.

Although numerous inlets have opened and closed in past centuries along the seashore, only two exist today. New Drum Inlet divides the northeast/southwest-oriented Core Banks into a 21-mile strip north of the inlet and a 22-mile strip plus a 3-mile spit south of the Barden Inlet separates the southern end of Core Banks from Shackleford Banks, the latter a 9-mile-long island with an east-west The eastern shoreline of Barden Inlet had been migrating eastward at an average rate of 2.6 feet per month over the past 37½ years to the point where destruction of the Cape Lookout lighthouse and associated historical structures was threatened. During 1980, the Corps of Engineers located the shipping channel farther west and deposited the spoil in the water adjacent to the lighthouse. This appears to have slowed the erosion and may have reversed it. The Corps will continue to dump dredge spoil offshore. Both Barden Inlet and Beaufort Inlet, on the western tip of Shackleford Banks, are regularly dredged by the Corps of Engineers. Dredging of New Drum Inlet has been discontinued but may be required in the future.

b. <u>Physical Characteristics</u>

(1) Geomorphology

The barrier-island landscape is dynamic. Ever changing, it reflects constant reworking by water and wind. The ocean is the dominant force. With its predominately southwest littoral or along-the-shore currents, its high waves and surge caused by storms, its historic rise in sea level, and its routine daily wave activity, the ocean is constantly moving the sand and changing the appearance of the islands--sometimes accreting, but more often eroding the ocean shoreline.

During the period from 1940 to 1975, the net effect of these processes was to erode the ocean shoreline of Core Banks a total of 52 feet, or an average of 1.5 feet per year. During a similar period, from 1943 to 1976, the ocean shoreline of Shackleford Banks eroded 49 feet, also for an average of 1.5 feet per year (Dolan and Heywood, 1977).

One of the most significant processes of the ocean is overwash, whereby storm waves from the ocean side penetrate or overtop the foredunes at various locations along the shoreline, usually carrying large amounts of sand. When the sand is dropped, deposits known as overwash fans or terraces are created. Sometimes the waves and their deposits extend across the island to the sound side.

An inlet is created when the scouring and sand transport is extreme enough. Then water (and sand) freely flushes between the ocean and the sound. Sand will be deposited in the quieter water on the sound side of the inlet, a marsh will develop trapping more sediment, and topographical change and plant succession will take place, eventually closing the inlet. The islands thus slowly migrate toward the mainland.

(2) Climate/Air Quality
The ocean and sound strongly influence the climate of the seashore, which is mild and predominately sunny. The

extremes of temperature are moderate--the average daily minimum and maximum are 38°F and 54°F for January, and 73°F and 87°F for July. The average annual rainfall is 52 inches. Prevailing winds blow from the northeast in the autumn and winter and southwest at other times of the year. Ten to 12 miles per hour is the average wind speed, while higher gusts occur during severe storms.

Two types of severe storms--hurricanes (tropical storms) and northeasters (extratropical storms)--strike the seashore. Northeasters occur in late fall, winter, and spring, and approximately 34 struck the North Carolina coast between 1942 and 1967 (Bosserman and Dolan, 1968). They are more frequent than hurricanes. Most hurricanes in North Carolina occur from August to October, with the greatest threat in September, although the hurricane season extends from June to November. On the average, between 1879 and 1955, hurricanes struck the North Carolina coast every two years, and other tropical storms (winds less than 74 mph) struck twice a year (Bearden and Grimsley, 1969). The threat of a hurricane is now present because 22 years have passed, the longest period on record without a storm of this type, since Hurricane Donna on September 12, 1960.

The national seashore is designated as class II for the prevention of significant deterioration of air quality (section 164 of the Clean Air Act amendments). Although there is some pollution from industrial operations and vehicular engines, the ambient air quality is well within North Carolina standards and air quality is not a major concern. Most air pollutants are dispersed by maritime winds.

(3) Soils and Minerals

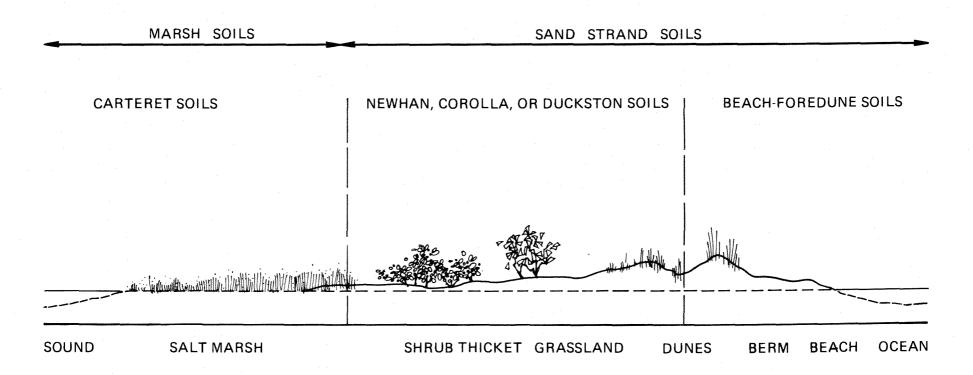
The soils within the seashore vary slightly with topography and, in turn, with vegetation. The major distinction is between the sand strand soils and the marsh soils. The different types are shown on the Characteristic Soil Types graphic. The soils are mapped for the entire seashore and are discussed in greater detail in the Soil Survey of the Outer Banks, North Carolina (USDA, SCS, 1977).

Almost all of the soils on Core Banks present severe limitations for development. This is due to poor bearing capacity, instability due to wind and water activity, and high water tables. Conventional subsurface sewage disposal facilities may contaminate the shallow freshwater table, especially in low-lying areas.

Much of the land on Shackleford Banks presents only slight limitations for development due to the occurrence of Newhan fine sand. However, this sand is highly pervious with questionable filtering capacities, and it may allow contamination of groundwater.

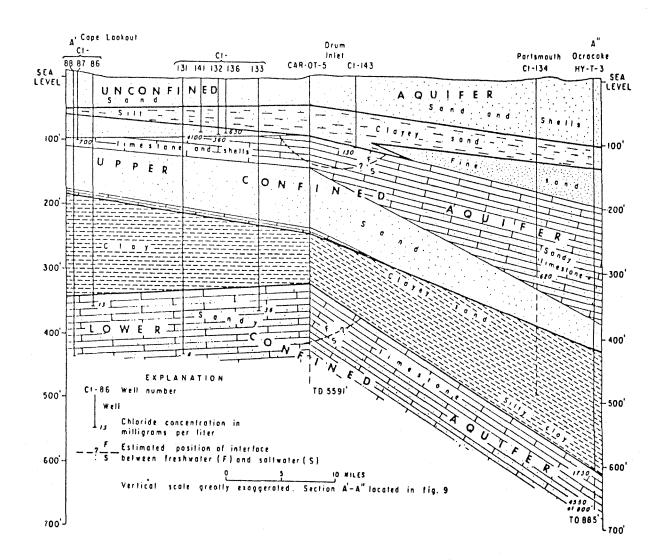
The only apparent mineral resource of the immediate area of the national seashore is silica sand. Studies by the North Carolina Department of Conservation and Mineral Resources indicate that silica sands in the area are too high in contaminants and too far removed from inland markets to be of value for glassmaking or other

CHARACTERISTIC SOIL TYPES



FROM: SOIL SURVEY OF THE OUTER BANKS, NORTH CAROLINA U.S. DEPT. OF AGRICULTURE, SOIL CONSERVATION SERVICE

GEOLOGICAL / GROUNDWATER SECTION



FROM WINNER, 1978. GROUND-WATER RESOURCES OF CAPE LOOKOUT NATIONAL SEASHORE, N.C. P.6.

specialized uses. In addition, the relative inaccessibility of the sands makes them of negligible value for construction purposes.

(4) Freshwater Resources

Fresh groundwater in Cape Lookout National Seashore occurs in an unconfined sand aquifer, an upper confined aquifer, and a lower confined aquifer. (See Geological/Groundwater Section graphic.) The possible availability of groundwater is described in Ground-water Resources of the Cape Lookout National Seashore, North Carolina (USDI, GS, 1978), and is summarized below.

The unconfined aquifer (freshwater lens) in areas occupied by dunes will yield as much as 30 gallons per minute of freshwater to a horizontal well. In other parts of the seashore this aquifer is subject to periodic overwash from the ocean, thus temporarily contaminating the aquifer with saltwater. Some dunes on Shackleford Banks and at Cape Lookout are high enough to offer some protection from overwash to the unconfined aquifer. Any lowering of the water table will cause a rise of the saltwater/freshwater interface.

The upper confined aquifer occurs between depths of about 90 to 150 feet but is known to contain freshwater only in the New Drum Inlet area and at Harkers Island. The potential yield of this aquifer is unknown, but probably does not exceed 10 to 15 gallons per minute.

The lower confined aquifer occurs between depths of 150 and 550 feet and contains freshwater southeast of New Drum Inlet. Potential yield is estimated to be as much as 500 gallons per minute per well. The estimated freshwater yield from all aquifers depends on the position of the saltwater interface at any site.

Water samples from the seashore generally meet drinking water standards set by the U.S. Environmental Protection Agency, although some samples contained excess concentrations of chloride, iron, and manganese. Excessive chloride in the area is indicative of the presence of saltwater. Excessive iron and manganese occur naturally in some groundwater, and may also be dissolved from well casings or pumping equipment.

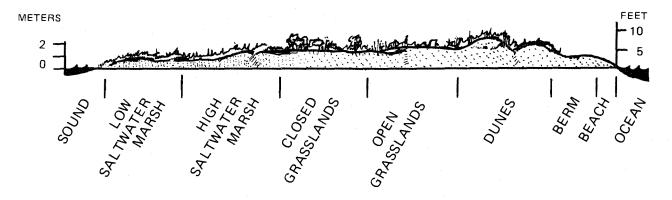
Water from the existing wells at the fish camps at Shingle Point and North New Drum Inlet, however, has not met standards. Similarly, water drawn anywhere from the unconfined aquifer is especially susceptible to pollution because of insufficient filtration between the ground surface and the aquifer. Therefore, water drawn from the unconfined aquifer often needs to be treated before use.

c. Ecological Communities

(1) Vegetation

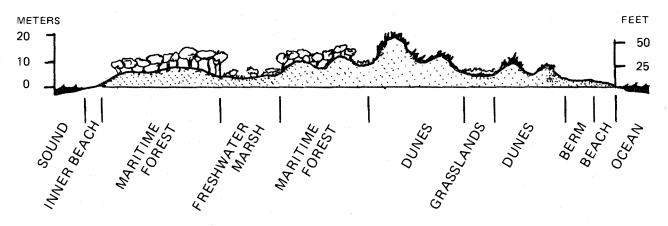
Vegetation is critical in maintaining what little stability exists on the barrier islands. Extensive root systems of maritime grasses help to stabilize sediments, whether windblown or waterborne. The grasses themselves tend to trap windblown sand. In this way, dunes

CROSS-SECTION OF BARRIER ISLAND ECOLOGICAL ZONES ON CORE BANKS NEAR CODDS CREEK



ADAPTED FROM: GODFREY, PAUL J. AND MELINDA M. GODFREY, BARRIER ISLAND ECOLOGY
OF CAPE LOOKOUT NATIONAL SEASHORE AND VICINITY, NORTH CAROLINA,
1976

CROSS-SECTION OF BARRIER ISLAND ECOLOGICAL ZONES ON SHACKLEFORD BANKS INCLUDING THE MARITIME FOREST



ADAPTED FROM: AU-SHU-FUN, VEGETATION AND ECOLOGICAL PROCESSES ON SHACKLEFORD BANKS, NORTH CAROLINA, 1974

build naturally and topography is elevated just enough so that other forms of plant life can take root.

Vegetation at Cape Lookout National Seashore forms distinctive ecological zones across the barrier islands as shown on the graphic, Cross Section of Barrier-Island Ecological Zones. The zones and some of their dominant plants, according to Snow and Godfrey (1978), are listed below:

Beaches--essentially devoid of vegetation except unicellular algae.

Berms--created by a few plants such as sea oats growing in the driftline, which may build small dunes, depending on storm frequency.

Tidal flats--intertidal areas essentially unvegetated except for stands of salt marsh cordgrass; found at inlets.

Dunes--low, scattered dunes formed by sea oats in overwash-influenced areas, and high densely vegetated dune fields where vines such as Virginia creeper may be found on the back side.

Open grasslands--sparsely vegetated by salt meadow cordgrass and pennywort, both of which grow up through sand after burial in overwash.

Closed grasslands--greater cover of salt meadow cordgrass, pennywort, broomsedge, and hairgrass; closer to the water table; also species of rush where water stands.

Woodlands--shrub thickets of wax myrtle, marsh elder, and silverling, or of yaupon and live oak; maritime forests of live oak, Virginia redcedar, and American holly. Both are on higher and protected lands.

High salt marshes--dominated by black needlerush and salt meadow cordgrass; flooded by spring and storm tides.

Low salt marshes--dominated by salt marsh cordgrass; flooded at mean low tide.

Subtidal marine vegetation--extensive stands of eelgrass and widgeon grass in protected, shallow waters.

Shackleford Banks, dominated by dunes/ grasslands, is the most stable land in the seashore. Because the island faces the prevailing winds, sand is blown into the dunes, increasing their height and protecting the maritime forest at the western end. Expanses of salt marsh are found to the east of the maritime forest on Shackleford.

Core Banks is fairly uniform with a wide berm, low dunes, grasslands, and extensive salt marshes. This island is less

stable than Shackleford as it is influenced by overwash and the prevailing winds blow sand parallel to the beach rather than into the dunes. An occasional shrub thicket is found, but extensive shrub thickets and high dune fields occur only near Cape Lookout Point and at Merkle Hammock, the Evergreens, and Portsmouth Village. The slash pine trees, found near the lighthouse, were planted by local residents prior to the establishment of the seashore. Guthries Hammock is the only natural maritime forest on Core Banks. The northern portion of Core Banks and Portsmouth Island are primarily tidal flats. At Portsmouth Village, the shrub thickets are bordered by salt marsh on the north, and dune fields are expanding eastward onto the adjoining flats.

(2) Animal Life

The barrier islands provide habitats for a diversity of birds and terrestrial and marine animals. Refer to A Preliminary Resource Inventory of the Vertebrates and Vascular Plants of Cape Lookout National Seashore, North Carolina (USDI, NPS, 1977) for checklists and descriptions of previous biological studies.

Birds are the most visible of all vertebrates within the seashore because of its location on the Atlantic Flyway, varied habitats, strong winds which drive oceanic birds onto land, and lack of development. Several significant and large nesting areas (e.g., 4 miles long and ½ mile wide) of colonial nesting shorebirds have been identified north of New Drum Inlet (USDI, NPS, 1979, and Parnell and Soots, 1979). Great numbers of least terns, gull-billed terns, common terns, and black skimmers nest in colonies on the beach/berm, among scattered low dunes, and on tidal flats. All of these birds except the skimmer are species of special concern to the state of North Carolina (North Carolina State Museum of Natural History, 1977). Least terns also nest on the barren sand behind the dunes south of New Drum Inlet. The area near the Cape Lookout lighthouse may be a major nesting site in North Carolina for another species of special concern, the Wilson's plover. Generally, the bird nesting season extends from April to October.

Other animals found on the islands include amphibians and reptiles--tree frogs, toads, turtles, and snakes; freshwater fish in the isolated freshwater ponds; mammals--shrews, raccoons, and rabbits--in the shrub thickets; and mosquitoes and other insect pests in wet areas of the dunes, grasslands, and marshes. The ring-necked pheasant, which is a favorite with some hunters, exists in shrub thickets on Core Banks. Domestic livestock--horses, cattle, goats, sheep, and rabbits--are present today on Shackleford Banks.

Marine animals inhabit the intertidal zones of the beaches and tidal flats. Burrowing mole crabs, ghost crabs, and coquina clams are found on the ocean beaches, and crustaceans and worms on the tidal flats. Others are similar to those listed in <u>A Checklist of Common Invertebrate Animals (Kirby-Smith and Gray, 1977).</u>

Many species of commercially valuable invertebrates and fish are supported by the food chain of the seashore's salt marshes. The marshes and tidal creeks serve as nursery grounds

for such fish as the Atlantic menhaden, spot, striped white mullet, and several species of flounder. Clams and scallops are found in the grasses and softer mud bottoms, and crab and shrimp are found on the bottom. In the sound waters, there are pound and gill netting for jumping mullet, croaker, drum, flounder, spot, bluefish, butterfish, Spanish mackerel, and pompano. The species popular in both ocean sport and commercial fishing include drum, channel bass, speckled trout, and gray trout-best near Portsmouth Village; flounder-best at Cape Lookout Point and New Drum Inlet; and bluefish, Spanish mackerel, cobia, sea mullet, and pompano-common along all Core Banks.

(3) Endangered or Threatened Species

Four animal species and no plant species which are on the federal "List of Endangered and Threatened Species" are found at Cape Lookout National Seashore. No endangered or threatened bird species are known to nest in the seashore presently. However, the eastern brown pelican (on the federal endangered list) may be seen all year, with up to 500 individuals being reported on some days fishing in the surf and resting on the ocean beach, particularly near the inlets. This pelican nests in colonies on three islands in Ocracoke Inlet north of the seashore, the most northerly breeding colony of this species. The Arctic peregrine falcon (endangered) is an overwintering and spring visitor which hunts for its prey in all habitats across the islands and rests on the ocean beach.

The Atlantic leatherback turtle (endangered) is known from only one nesting in 1966, but the Atlantic loggerhead turtle (threatened) is relatively common at the seashore even though it is near the northern limit of its nesting range. In 1979, six nests were reported on Shackleford Banks, the only year for which a record is available for that island. On Core Banks/Portsmouth Island, there were 31 loggerhead nests in 1978, 66 in 1979, 46 in 1980, and 31 in 1981. Of these, 23 in 1979, 30 in 1980, and 24 in 1981 were located on a 7-mile stretch of beach 3 miles west of Cape Lookout Point and 4 miles north. This is the greatest concentration of nests in North Carolina. During the four-year period 1978-1981, the first nest was dug on May 24 and the last on August 31. Females lay their eggs at night in a hole they dig on the beach/berm or near the base of dunes. Incubation of the loggerhead turtle eggs averages 60 days, and hatching dates observed from 1978 to 1980 ranged from July 28 to late October. Passing vehicles leave ruts in the sand and some hatchlings fall into the wheel tracks and follow them rather than heading toward the ocean. Some of these hatchlings die of desiccation or predation by sea gulls and ghost crabs. Routing vehicles behind the nests when turtles are hatching eliminates the wheel tracks. Turtles hatch at night and some within a mile of the lighthouse have become disoriented and have been observed crawling towards it. Many of these turtles may die also.

d. Scenic Quality

The scenery of Cape Lookout National Seashore is characterized by the following attributes:

Expansive vistas--These occur along the ocean and sound shores, where one can see many miles into the distance.

Isolation--The islands are detached from the primarily rural mainland and surrounded by water, but are accessible by boat.

Contrast--The many edges between water and land attract the eye, as does the vertical shaft of the lighthouse contrasting with the surrounding flat surfaces. There are also contrasts of maritime forests with sand dunes, dunes with beaches, and stark ghost trees with living ones.

Motion--Rolling surf waves, blowing sand and grass leaves, and flying or running birds are the features here that catch the eye.

Intimate-Scale Areas--Hollows among the dunes are areas where one may feel alone with that immediate scene.

Color--The greens and grays of the seashore are not the warm colors to which people respond. Occasional blossoms, colorful flotsam, and sunsets stand out all the more against this background. So does the exciting history of shipwreck and life-saving when imagined in the bleakness of winter.

Variety--Views may be toward the mainland, toward the ocean, along the shore, or across the island, each quite different.

Detail--Beachcombing on the shore, fishing in the surf, hiking between the dunes, and inspecting the historic areas are among the activities that bring visitors into close contact with the environment.

Remoteness--The feeling of remoteness from civilization is great in all parts of the islands except for the western sound shore of Shackleford Banks, where industrial development on the mainland is clearly in view.

e. Suitability for Recreation and Development

Appropriate recreational uses of the ecological zones of the seashore are shown on the graphic, Interpretation of Cape Lookout Ecosystems/Suitability for Recreational Use. Generally, the beach and berm are most tolerant to recreational uses, and the shrub thickets and grasslands are the most suitable sites for structures.

The areas of environmental concern (AEC) recognized at the seashore by the North Carolina Coastal Management Program include salt marsh as "coastal wetlands"; the land from mean high water for a distance of 75 feet landward as "estuarine shorelines"; the waters surrounding the islands as "estuarine water" or "public trust areas" (also includes submerged lands which extend seaward from mean high water); and "ocean hazard areas" of beaches, frontal dunes, inlet lands, and other areas in which geologic, vegetative, and soil conditions indicate a substantial possibility of excessive erosion or flood damage. The North Carolina Coastal Management Program objectives suggest appropriate management and development for these sensitive areas to protect the values of the estuarine system and to eliminate unreasonable danger to life and property in the hazard area (North Carolina Department of Natural Resources and Community Development, Coastal Management

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-	SOUND	SALTWATER MARSH	SHRUB THICKET	GRASSLAND	SCATTERED DUNEFIELD	BERM BEACH	OCEAN
SENSITIVITY	IMPORTANT CONTRIBUTO ESTUARINE ECOSYSTEM PI LOW SALTWATER MARSH E		REPRESENTS A STABLE AND PROTECTED AREA; LIMITED DISTRIBUTION ON ISLAND	IMPORTANT TO SUR- VIVAL OF BARRIER ISLAND. RECOVERY AFTER OVERWASH VEGETATION IS EASILY TRAMPLED AND CHANGES WITH ALTERED WATER TABLE	DUNE AND VEGETATION ARE EASILY DESTROYED RESULTING IN INCREASED SAND MOVEMENT BIRD NESTING DURING SEASON	MOST RESILIENT PART OF ISLAND TO MAN'S USE; TIDAL ACTION CLEANSES AWAY MINOR DISTURBANCES SEA TURTLE NESTING DURING SEASON	HIGHLY TOLERANT
CONSTRAINTS	SHALLOW HIGHLY PRODUCTIVE MUR	TIDAL WATER KY SUBSTRATE	IMPENETRABLE THICKET	HIGH WATER TABLE SUSCEPTIBLE TO OVERWASH	FREQUENT SAND MOVEMENT VULNERABLE TO STORM ACTION	TIDAL AND STORM ACTION SHIFTING SUBSTRATE	PLACID TO STORMY
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INTERPRETATION OF CAPE LOOKOUT ECOSYSTEMS/SUITABILITY FOR RECREATIONAL USE

Program, 1979, subchapter 7H). State priorities for proposed NPS use of the AECs are presented in the "Compliance and Consistency Actions" section.

2. Cultural Environment

The environment of Cape Lookout National Seashore has deterred man from extensively settling the area, although historically the islands have served as prominent landmarks for mariners and have been busy with maritime activities. Early European sailors knew both the dangerous shoals off Cape Lookout Point and the safe harbor of Lookout Bight. In later years, the Cape Lookout lighthouse warned of the hazards, and life-saving operations rescued seamen in trouble.

Fishing has always been the dominant vocation of the Outer Bankers. With increased maritime activity, Portsmouth Village became a transshipment point where cargo was unloaded and reloaded when ships passed through the shallow Ocracoke Inlet. Later Diamond City was established on Shackleford Banks for whaling, but it was abandoned during a period of hurricanes in the late 19th century. Today virtually nothing remains of Diamond City, but a number of structures survive in Portsmouth Village. The village is a unique reminder of past cultural and economic life on the Outer Banks.

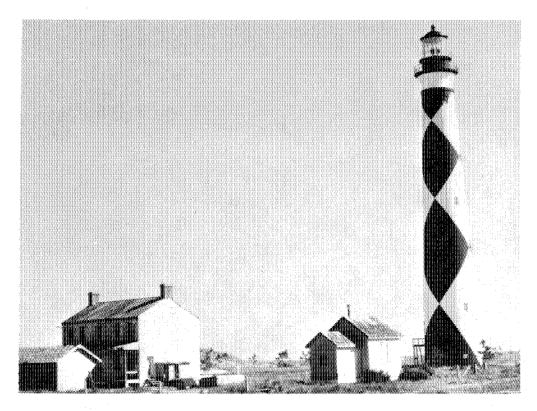
The state historic preservation officer of North Carolina and the Advisory Council on Historic Preservation have been consulted about the seashore's cultural resources. The lighthouse complex (see the Cape Lookout lighthouse photographs) is listed under state significance in the National Register of Historic Places. In addition to the lighthouse, the 25-acre complex includes the keeper's quarters, coal and wood shed, summer kitchen, and fuel storage building. The lighthouse is owned by the U.S. Coast Guard; the other structures belong to the NPS. existing lighthouse structure dates from 1859, and its diagonal black and white checker pattern dates from 1873. There had been an earlier tower dating from 1812. Portsmouth Village (see the Portsmouth Village photographs) is also entered in the National Register as a 250-acre historic district of state significance. There are 25 structures that are typical of coastal Carolina architecture of the 1820-1930 period, at least eight cemeteries, and ten ruins and/or sites of former residences. Earlier periods of the village's history are represented poorly by historic structures or not at all.

Assessment of Archeological and Historical Resources concluded that no aboriginal sites known to exist within the seashore were felt to be culturally and scientifically significant enough to justify their nomination to the National Register. Algonkian-speaking Indians were the area's first known inhabitants. Shell midden sites on the sound side of Shackleford Banks and at Cape Lookout are the only remains of their occupancy. However the sites, most of which are outside the seashore easement, have been reduced to almost unintelligible remains.

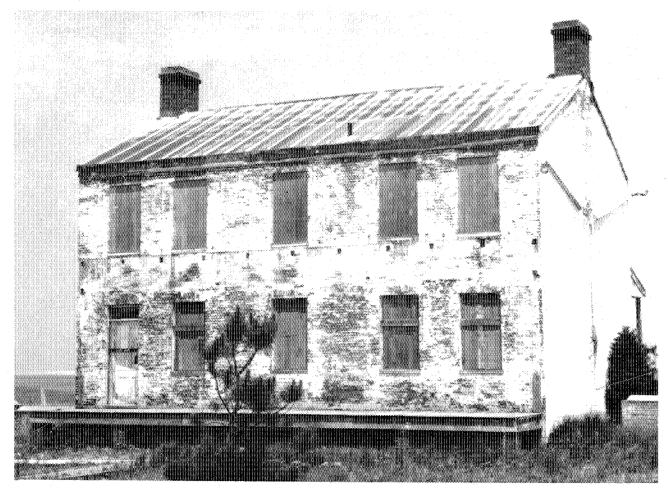
3. Existing Seashore Use and Development

a. Visitor Experience

People have been attracted to the barrier islands of Cape Lookout National Seashore for recreation because of the wild and

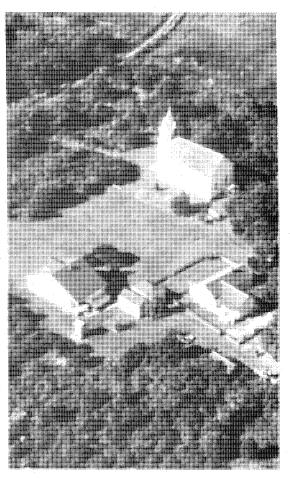


Cape Lookout lighthouse with summer kitchen, keeper's quarters, and coal and wood shed is listed in the National Register of Historic Places.









Portsmouth Village, a historic district of 250 acres, is listed in the National Register of Historic Places.



isolated environment and as a place "to get away from it all." There is no similar environment on the adjacent islands.

On the low-lying, narrow islands that comprise Core Banks/Portsmouth Island, the visitor is remote from the mainland and experiences the dominance of the restless sea on one side and the more placid sound waters on the other. (See the photographs of Core Banks and Shackleford Banks.) The dunes on Shackleford Banks near the maritime forest offer an unusual opportunity for the visitor to "become lost" in a unique and undulating topography--where one can discover for oneself the beauties of the coastal landscape. The contrast between the open dunes and the maritime forest is striking. There is also a special intrigue with the history of the "lost" Diamond City, Cape Lookout lighthouse, and Portsmouth Village.

Visitors to the national seashore may well experience a feeling of isolation and seclusion. It begins with the boat ride across the sound--the transition from the security of the mainland to the uncertainty of an island. The more a person knows about the barrier islands, the more he can appreciate the marvelous diversity of plant and animal life. It is an excellent place for one to observe and to wonder about natural processes and the interrelationships of living things. Especially if he is on foot, the visitor may feel the thrill of adventure and experience a sense of self sufficiency, survival, and even danger. For this is a place that provides little or no escape from the hot sun, the blowing and sand-blasting wind, the rainstorms, and the biting insects; and freshwater is very difficult to come by. Yet when weather conditions are right, it is a place of incredible beauty, comfort, and contentment.

b. Visitor Use Data

Records of visitation at Cape Lookout National Seashore have been kept from the time of its establishment in 1976. The number of visits is determined by combining the actual number of ferryboat passengers, reported by the concession permittees, and the number of persons reaching the barrier islands in private boats, as observed by the park rangers. This and related data are summarized in table 4.

Table 4: Visitor Use Statistics

 907 1,	218 1,	382 56,404 182 1,101 977 8,290
, .		831 12,055 908 10,504
5 6	907 1, 5,841 8, 6,145 10,	907 1,218 1, 5,841 8,072 9, 6,145 10,807 11,

The major season of visitation is from June to November. In 1981, October showed the highest visitation--17.9% of the annual total--and July showed the second highest--16.4%. The months of lowest visitation are December through April.

Fishing has been the most popular recreational use, with sightseeing/beachcombing second in popularity (30% and 18%, respectively, in 1981). The fish camp cabins are available for rent from about April 1 to December 1. At the height of the season, October and November, the occupancy rate on Friday and Saturday nights is usually 100%, with four to eight fishermen sharing each cabin. About 98% of the cabin patrons bring a vehicle with them and use it while on the island.

Visitor activities vary by season as shown in table 5.

Table 5: Ranking of Activities by Their Popularity (1 = most popular)

	Fishing	Sightseeing/ Beachcombing	<u>Picnicking</u>	Guided Walks	Hunting
January, February	3	2			1
March, April, May	1	2	3		
June	1		3	2	
July, August		1	3	2	
September, October, November	1	2	3		
December	1		3		2

The average number of hours per day that visitors engage in activities varies with the activity.

Fishing - 6 hours Swimming - 4 hours Picnicking - 1 hour Sightseeing/beachcombing - 2 hours Surfing - 2 hours Guided walks - 1 hour Hunting - 8 hours In terms of hours that visitors participate in each use during a year, fishing and sightseeing/beachcombing still remain most popular. (See photographs of recreational uses.)

Characteristics of the seashore visitors were sampled in a survey (field observation guide) during 1977 and 1978, providing an indication of the visitor profile. The majority of visitors are from North Carolina, especially those who come in the spring and fall. During the summer, there are more out-of-state visitors. Most visitors come in groups composed of family and friends. The majority have been to the seashore before, having originally learned about Cape Lookout National Seashore because they live locally or their friends told them about it.

Transportation to the islands is now provided by five private ferryboat operators under concession permits issued by the NPS. They serve Cape Lookout Point, Shingle Point, North New Drum Inlet, and Portsmouth Village from the villages of Harkers Island, Davis, Atlantic, and Ocracoke, respectively. Vehicles are also transported, one or two per trip, on the ferryboats from Davis, and one to three per trip from Atlantic. In addition, people reach the islands by noncommercial private boats. Pleasure boating is common in the surrounding waters, especially at Cape Lookout Bight.

A tractor-drawn flatbed wagon operated under a concession permit currently provides transportation from near the lighthouse to Cape Lookout Point. Visitors may load and unload at any point en route.

From the fish camps, concentrated at Shingle Point and North New Drum Inlet, anglers drive to favored fishing spots, locate a school of fish swimming along the shore, and then drive ahead of them to fish the school repeatedly. At Portsmouth Island, New Drum Inlet, and Cape Lookout Point, the anglers who drive to these sites usually stay there. Hunters also drive their vehicles along the islands in search of waterfowl.

Commercial fishing from boats occurs in the waters surrounding the national seashore. There is trawling for fish and shrimp in the ocean. Oystering, clamming, crabbing, and scalloping take place on the sound side of the islands in the marsh creeks, eelgrass beds, and inlets. Fish pound netting, long hauling, gill netting, flounder gigging, shrimping, and crab potting are practiced in the sound. The only commercial fishing from the islands is flounder gigging at Cape Lookout Bight and beach hauling near Portsmouth Village (North Carolina Division of Marine Fisheries, 1975).

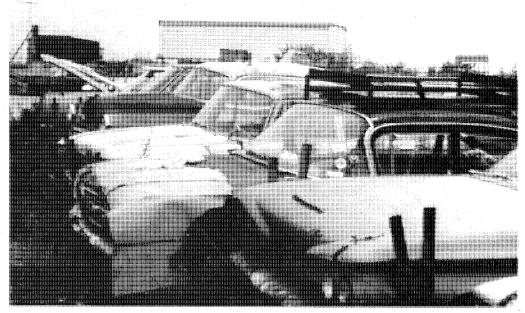
c. Existing Development

Prior to the establishment of the national seashore, clusters of fishing shacks had been constructed by third-party interests, and vehicles were driven extensively over the islands. Vehicles which broke down in the past were abandoned in many cases. Some 340 structures and more than 2,500 vehicles cluttered the islands when the seashore was established. The seashore is being cleaned up. Today, most structures and all but 600 of the vehicles have been removed.





Shacks, abandoned vehicles, and junk are being removed from the national seashore.



Many structures will remain on the seashore, including those in the two historic districts previously described. Scattered along Core Banks, especially near Cape Lookout, there are a number of summer cottages. All of those structures are administered by the NPS under 25-year leases, life estates, or special-use permits.

Near the lighthouse there is a public comfort station. Approximately 1 mile south is a ranger station which was converted from a fish camp/store complex initially owned and operated by a private resident. Both the comfort station and ranger station are operated by the NPS. The cabins at Shingle Point and North New Drum Inlet are under concession permits and are presently available to rent. There are now some 59 structures on Shackleford Banks and their future status will be determined at the time of acquisition.

d. Private Rights, Interagency Agreements, Permits Interagency agreements and private rights* are recognized in the enabling legislation. Revocable special-use permits have also been assigned administratively. Locations where interests other than NPS prevail are shown on the Existing Conditions map.

Section 4 of the enabling legislation (PL 89-366) stipulates that the recreational uses of hunting and fishing be permitted in accordance with the laws of the state of North Carolina and the United States, and that rules and regulations be established in consultation with the North Carolina Wildlife Resources Commission and Department of Conservation and Development. This cooperation is further detailed in a memorandum of understanding between the NPS and the North Carolina Department of Natural and Economic Resources dated 1976.

The state of North Carolina has reserved to its use a 500-foot-wide easement across Core Banks as the possible location for a pipeline to service an offshore deep-water oil port. The easement is located at Hogpen Bay, approximately 4.5 miles north of the lighthouse. The state also reserved to itself the ownership of lands on the ocean side between mean high water and mean low water and ownership on the sound side of all submerged lands within 150 feet of mean low water, but these lands are managed by the NPS under an easement.

The U.S. Army Corps of Engineers can contribute to shore erosion control or beach protection measures (section 6, PL 89-366). The plan for such measures must be in accordance with the enabling legislation and must be mutually acceptable to both the secretary of the army and the secretary of the interior. Certain islands north of Barden Inlet, an offshore area west of the light station, and a stretch of ocean beachfront north of the lighthouse have been reserved for spoil disposal from ship channel dredging. It may become necessary to reopen New Drum Inlet, which is shoaling.

^{*}Both the state of North Carolina and the United States negotiated leases and life estates, when appropriate.

The U.S. Coast Guard owns and maintains a light station on 5.39 acres near Cape Lookout Point. It is connected to a sound-side dock by a poured-concrete road. The Cape Lookout lighthouse is owned and operated as an active navigational aid by the Coast Guard. A $1\frac{1}{2}$ -mile-long overhead line transmits power from a generator at the station to the lighthouse. An acre of land at the base of the lighthouse is also owned by the Coast Guard.

Rights of occupancy for 25 years or life estates are provided to those persons "who on January 1, 1966 owned property which on July 1, 1963 was developed and used for noncommercial residential purposes" (subparagraph (c), section 2, PL 89-366). The law specifies that the land at each residence will not exceed 3 acres. In addition, North Carolina developed several 25-year lease agreements prior to the establishment of the seashore. There are nineteen 25-year leases, eight life estates, and nine leases that are pending or under litigation. These rights of occupancy are concentrated at the Cape Lookout Point area and Portsmouth Village, with others distributed along Core Banks and Portsmouth Island. There are also some properties of undetermined status.

Twelve special-use permits are in effect for occupancy of structures in Portsmouth Village. These permits are intended to help protect the historic structures in the village.

At the time the seashore was established, several boats were used to ferry people and vehicles to the barrier islands and to the fish camps that provided overnight cabins. As an interim measure, until public use patterns were established and planning could be completed, concession permits were issued to the operators of these services. After adoption of the GMP, a concession prospectus will be prepared and bids will be sought from those interested in providing the public transportation services and operating the camps.

IV. ENVIRONMENTAL CONSEQUENCES

The following is an analysis of the potential environmental effects associated with GMP proposals and alternatives.

A. Impacts on Harkers Island and the Region

The region will be affected by visitors traveling to Cape Lookout National Seashore and utilizing tourist services provided by private business. The number of visitors could reach 100,000 a year, based upon recent visitation at Cape Lookout National Seashore and similar parks in the region (MTMA Design Group, PA, 1980). Visitation projections and the resulting estimates of socioeconomic impacts vary with the level of development and intensity of use associated with each alternative.

Alternative 1 (The Plan): Possibly 100,000 visits a year Alternative 2 (No Action): Lower visitation than alternative 1 Alternative 3: Highest visitation among the alternatives

Alternative 3. Alghest visitation among the alternatives

1. Visitor Traffic

Visitor vehicular traffic increases will primarily affect Carteret County. Ocracoke Island of Cape Hatteras National Seashore will also be affected but to a lesser extent. Approximately 60% of visitors coming to the seashore will drive through Beaufort along US 70 into eastern Carteret County and will enter through the Harkers Island site (MTMA Design Group, PA, 1980) via 8 miles of Harkers Island Road (SR 1332 and SR 1335). Traffic projections vary with the visitation associated with each alternative.

Alternative 1 (The Plan): For the summer design day in 1990, it is estimated that the average daily traffic (ADT) from visitors will be 1,175 vehicles total, and this number will be 50 percent greater on a summer peak day. To and from the Harkers Island site there will be 750 ADT from visitors for the summer design day and up to 1,125 ADT on a summer peak day (MTMA Design Group, PA, 1980).

Alternatives 2 and 4: Lower number of visitor vehicle trips than the plan.

Alternative 3: Highest number of visitor vehicle trips.

National seashore visitor vehicles will add volume to the highways in the region. The 1978 average of 13,000 vehicles/day for the involved portion of US 70 (North Carolina Department of Transportation, 1979) is near the typical capacity of a four-lane road, 13,000 to 18,500 vehicles/day (North Carolina Coastal Resources Commission, 1978, p. 84). The typical capacity of a two-lane road, 5,700 to 8,200 vehicles/day, is much higher than the 1978 traffic count along Harkers Island Road, 2,260 vehicles/day (ADT). Without considering the impact of Cape Lookout-generated traffic, the existing ADT on SR 1335 is expected to grow to 3,000 ADT by 1990.

Alternative 1 (The Plan): When the projected visitor traffic is combined with other traffic, the resulting 4,000 ADT will create

periodic congestion on Harkers Island Road (SR 1335), but traffic will still be below its rated capacity.

Alternatives 2, 3, and 4: All have the same relationship to the highway capacities as alternative 1.

Traffic on Harkers Island is growing from increasing community development and population. SR 1335, which is narrow and without a shoulder, runs the entire 4.5-mile length of the island, coming to a dead end at the NPS site. It serves as the main street for Harkers Island village and is lined with older homes, businesses, and community services; it also provides access to motels and marinas. Therefore, increasing traffic could affect those who live or work along the road. There will be greater noise plus a higher chance of accidents which could cause personal injury or property damage.

The plan anticipates that an access road might be built through the north part of Harkers Island village to serve the NPS site in place of SR 1335. This would reroute seashore visitors and some local traffic from the community's main street. Some of the impacts will thus be transferred to the north route, which now serves a developing residential area, boatyards, cemeteries, a church, and a water pumping station.

2. Visitor Tourist Trade

Seashore visitors will patronize local tourist establishments such as restaurants, motels, campgrounds, curio shops, gas stations, and supply stores, spending an average of \$11.00 per person-day (North Carolina Department of Commerce, Travel and Tourism Division, 1978, p. 1). Projections of expenditures in Carteret County vary with the level of visitation associated with each alternative.

- Alternative 1 (The Plan): An estimated annual expenditure of \$1,100,000 in the region
- Alternatives 2 and 4: Lower expenditures in the region than with the plan
- Alternative 3: Highest expenditures in the region

A wide range of businesses will benefit from each dollar spent by the park visitor, distributed as follows (North Carolina Department of Commerce, Travel and Tourism Division, 1978, p. 3):

Hotels, motels, and inns Restaurant and other food services Gas stations and auto services Passenger carriers Recreation and tourist attractions Other retail stores and services	\$.17 .21 .22 .14 .14 12
Tourist dollar	\$1.00

In some alternatives, cabins and campgrounds available on the seashore islands would act as competition to local private business.

- Alternative 1 (The Plan): Motel income outside the seashore could gain as visitation to the seashore increases. More visitors expected to be using the new camping shelters will also increase the income of the concessioners.
- Alternative 2: The currently unattractive fish camp cabins would probably not compete greatly with other area businesses for visitor patronage.
- Alternative 3: Same as alternative 1.
- Alternative 4: Visitor expenditures would probably hold at present levels.

Overall, visitor expenditures will benefit the local economy. A typical distribution follows (North Carolina Department of Commerce, Travel and Tourism Division, 1978, p.2):

Personal income	35%
Goods and services industries	49%
Taxes - local (Carteret County)	
and North Carolina	14%

It is anticipated that a major portion of visitor dollars will be spent in Bogue Banks because it is the largest tourist center in Carteret County. (Refer back to the Vicinity map.) However, visitor trade will also boost the existing motels, restaurants, campgrounds, gas stations, marinas, and curio shops on Harkers Island. This village already is more developed for tourist business than most other places in eastern Carteret County. In the other communities, visitors may purchase fuel, fishing gear, and other supplies before going across to Core Banks. Some new tourist facilities may also be established along US 70 between Harkers Island and Bogue Banks.

This impact from the tourist trade (an indirect effect) is consistent with the <u>Carteret County Land Use Plan's</u> economic objectives to "continue emphasis on tourism as a major source of income" and "increase efforts to attract non-offensive industry that will provide better job opportunities and personal incomes for citizens of the County" (North Carolina Coastal Resources Commission, 1978, pp. 59-60).

3. Sport and Commercial Fishing

Fishing will continue as a viable use of the seashore. However, fishermen who use Core Banks/Portsmouth Island will be affected by the modes of transportation on the islands described under the different alternatives. This is further discussed under "Impacts on Visitor Use."

Alternative 1 (The Plan) and Alternative 2: No change in transportation and fishing.

- Alternative 3: Fishermen would use public transport along Core Banks/Portsmouth Island (46 miles) and some would drive their vehicles (25 miles).
- Alternative 4: Fishermen would not use any on-island vehicle, public or private.

Those users who have become accustomed to driving their vehicles on the islands would feel inconvenienced by the shift to concession transport in alternative 3, or by the elimination of vehicle use in alternative 4. In alternative 3, they would have to carry their gear and catch to and from the transportation corridor. Then they would have to wait until the transport vehicle came by to be able to follow a school of fish down the beach or to locate a new one. In alternative 4, the traditional practice of following the fish would be eliminated, as would most of the surf fishing, which has become dependent upon vehicle use. Fishermen who do not currently drive their own vehicles on the beach (because of the high expense to transport them to the islands or to repair them from salt and sand weathering) would generally have improved mobility on these islands if the public transport system of alternative 3 was implemented.

There will be no effect on the fishing and shellfishing activities that occur in the waters surrounding the islands, or that require private motorboat access to the islands. Therefore, the variety of commercial and sport fishing activities--trawling, netting, clamming, oystering, crab potting, scalloping, shrimping, and crabbing (North Carolina Division of Marine Fisheries, 1975) will continue at Cape Lookout National Seashore. Only beach hauling, which involves the use of vehicles on the beach, might be affected by the various alternatives.

- Alternative 1 (The Plan) and Alternative 2: Beach hauling will continue on 46 miles along Core Banks/Portsmouth Island.
- Alternative 3: Beach hauling could continue on 25 miles, south of New Drum Inlet.
- Alternative 4: Vehicle use would no longer be allowed; therefore, beach hauling would have to be conducted in the traditional way without a vehicle to tow the boat.

Overall the plan is in agreement with the <u>Carteret County Land Use Plan's</u> economic objectives of continued emphasis on tourist-related activities including sport fishing and on encouraging and promoting the commercial fishing industry. Additionally, there is agreement with the county plan's service objective--to strive for the development and improvement of recreational opportunities and facilities for citizens of all ages (North Carolina Coastal Resources Commission, 1978, pp. 59-60).

4. Land-Use Changes

Land use in presently undeveloped but potential tourist areas will change to the degree that demand rises or falls for motels, campgrounds, restaurants, curio shops, and gasoline stations. Such

changes are apparent in Carteret County, having been underway for years prior to the establishment of Cape Lookout National Seashore. The incentive for such changes results from demand by tourists, and projections of this demand vary with the alternatives.

- Alternative 1 (The Plan) and Alternatives 2 and 4: A moderate demand for tourist developments will result in a moderate incentive for land use change.
- Alternative 3: Greatest demand for tourist developments would result in largest incentive for land use change.

Heavier visitation to the seashore will be an incentive for new construction on Bogue Banks, Harkers Island, and along US 70 (an indirect effect and an irreversible commitment of resources). Such changes have already been anticipated for Bogue Banks, and plans are being made accordingly (North Carolina Coastal Resources Commission, At Harkers Island, land use changes are already occurring in conflict with the <u>Carteret County Land Use Plan's "community"</u> classification calling for "existing and new clusters of low density development not requiring major public services" (North Carolina Coastal Resources Commission, 1978, pp. 118-19). To compound this problem, the Harkers Island village has no local zoning, other than the county regulations, bν which to control land use changes. development proposed for the 91-acre NPS administrative site on east Harkers Island (a direct impact) is consistent with the community classification and the county plan's land development objective to "encourage preservation of the County's natural resources" (North Carolina Coastal Resource Commission, 1978, pp. 58-59).

5. Changes in Local Tradition

Primarily from changes in tourist trade and land use, local traditions and culture have also been changing. In addition to the previous influences, the scale of development and operation at the national seashore will also effect change:

- Alternative 1 (The Plan): Moderate factor in causing cultural change.
- Alternative 2: Small factor in cultural change because some of the administrative functions would remain in Beaufort
- Alternative 3: Large factor in cultural change because of high visitation and larger staff presence on Harkers Island
- Alternative 4: Small factor in cultural change because of low visitation and small staff presence on Harkers Island

A distinct, down-east, maritime culture had evolved at Harkers Island, isolated until 1940, when a vehicular bridge was constructed to the mainland and power was brought to the island. Then a dramatic change in the islanders' lifestyle began.

Most residents trace their origins back to Diamond City and the other villages on Shackleford Banks abandoned following hurricanes in the 1890s. After moving to Harkers Island, they continued their maritime livelihoods of fishing and boatbuilding, and they still build a unique "flared bow" boat. Other residents have chosen employment on the mainland. More recently Harkers Island, as a jumping-off point for Core Banks, has served tourists on a seasonal basis with restaurants, marinas, motels, and ferryboat service. There has also been an influx of outsiders who have bought land and have built vacation homes.

Harkers Island now has a population of about 1,600, having nearly doubled since the people moved off Shackleford Banks. There are an estimated 2,000 summer residents. The islanders sense a loss and resent the outsiders. Newcomers do not use the Elizabethan-like dialect of the native islanders. Newcomers are changing the character of life on the island and contributing to inflating land values.

The community has no local political or governmental mechanisms, thus it is difficult for it to cope either with outside influences or with internal problems of integrating change (Peck and Lepie, 1977). Because of this, it is likely that "the future development of tourism may be decided by people, conditions, and forces well outside the kinship, religious, and social networks of the Islander community" (Peck and Lepie, 1977, p. 171).

It is apparent that causes of cultural change have preceded the NPS presence on Harkers Island. NPS employees who choose to live there (a direct effect) will only add to the number of outsiders already present. Any additional tourist developments due to a demand from the seashore visitors (an indirect effect) will increase the land use changes already begun. The resulting change in local tradition (an adverse effect which cannot be avoided, but to which any NPS action is only a partial contributor) is in opposition to the <u>Carteret County Land Use Plan's</u> cultural and historical objective "to preserve meaningful local traditions and local cultures" (North Carolina Coastal Resources Commission, 1978).

6. Effect on Water Resources

The quality of the waters surrounding southeast Harkers Island, which are class S-A for shellfishing, will improve when the existing septic systems are eliminated. New sewage treatment systems will be at a level to meet federal and state standards. Sewage facilities will be designed to standards, so there will be no adverse effect on groundwater quality.

7. Scenic Values

The development of the administrative site at east Harkers Island will change the appearance of the site. The present nonintegrated commercial/residential land use there will be replaced by the comprehensively designed administrative/visitor/ferryboat facilities on part of the land. The balance of the site will not be developed; it will remain as a natural area on the east end of Harkers Island, in contrast to the adjacent built-up community.

The landscape within the village of Harkers Island will change more drastically as tourism increases (an indirect effect). Private industry will provide for the visitor by constructing new buildings, erecting advertising signs, etc., that will change the appearance of the community.

Both the scale of development on the administrative site and the level of private tourism development will depend on the level of visitation. The resultant impacts will be similar to those discussed previously under the heading "Land Use Changes."

B. Impacts on the Physical Environment

Generally, the coastal processes will be undisturbed by the plan or the alternative actions. These processes will continue to dominate the barrier islands of Cape Lookout National Seashore. The terrain of the islands--including most traces of man's activities--will be reworked by wave, wind, storm surge, and overwash, depending on the severity of the weather.

1. Dredging and Disposal of Bottom Sediments

Core and Back sounds are shallow. Ferryboat channels to the island landing points and to Harkers Island are required for public access. Dredging alters the bottom topography of the sound along the access channels. The quantity of dredging and the method used will depend on the alternative.

Alternative 1 (The Plan) and Alternatives 2 and 4: Ferryboat access along "natural" channels maintained by "kicking-out" will repeatedly disturb the bottom sediments. Bottomlands in the channels to Shingle Point (approximately 9,500 feet) and North New Drum Inlet (approximately 4,500 feet) across Core Sound, and to Portsmouth Village (approximately 3,500 feet) across Ocracoke Inlet, will be involved. Each passage of the boat disturbs a small but specifically unquantifiable volume of sediments stirred up by the boat's propeller. These sediments settle in time and blanket the sound bottom adjacent to the channel. This has been going on for several decades.

Periodic minor dredging of the ferryboat turning basins at Shingle Point, North New Drum Inlet, and Portsmouth Village, and dredging the marina and connecting channel (approximately 700 feet) at Harkers Island, could involve a considerable disturbance and/or removal of bottom sediments. This dredging will also locally alter the bottom topography of the sound adjacent to the islands. The quantity of dredge spoil material and the location of spoil disposal will be determined when the project is designed.

Alternative 3: Under this alternative, larger ferryboats and larger NPS maintenance boats would be required. For them to operate, deeper access channels would be dredged and maintained across the sandy bottom sediments of Core and Back sounds and Ocracoke Inlet. The "worst-case" situation is represented in table 1. The actual extent of the area impacted

would depend on the precise dimensions and locations of the access channels, which would be determined in the design stages of the dredging program. Similarly, the frequency of these impacts would vary with the requirements for maintenance dredging.

Basically, dredging and disposal of dredged materials will constitute a process of artificially induced sediment erosion, transport, and deposition, differing from the natural processes by being much more concentrated in time and space. Turbidity will temporarily increase when the bottom sediments are disturbed and resuspended. The water will be discolored and light penetration reduced. The chemistry of the water could also change, and the potentials for remobilization of chemical constituents and for oxygen depletion increase. Thus, the dredged sediments could be physically and chemically altered (USDI, FWS, 1977). This disturbance is less, but could occur more frequently, with "kicking-out."

The alteration of the bottom topography in alternative 3 would possibly modify the existing water circulation patterns. For example, currents might be channeled into the dredged trenches, thus changing the usual sediment transport patterns (USDI, FWS, 1977).

Dredge spoil materials will require disposal sites, which may be in the swash zone, on a spoil island, or confined at a higher elevation on the island, to be determined in the design stages of the dredging program. The magnitude of this impact will increase with the amount of dredge spoil material, depending on the depth and number of access channels and basins in the alternatives. Before this type of dredging is undertaken, an application for a section 10/404 permit will be filed with the Corps of Engineers.

At the disposal site, these dredged materials will be added to the surface materials. It is possible that as the materials mix, they will be physically and chemically altered. After discharge, some of the unconsolidated fine particles suspended in the dredge slurry will probably remain in temporary suspension. If the disposal occurs in the swash zone, the surf action is likely to disperse the sediments and the littoral currents may transport them along the beach.

disturbance from "kicking-out" or dredging of channels (adverse effects which cannot be avoided) could be substantial during the action but of comparatively short duration; alterations of the bottom topography will remain longer. However, given the dynamic nature of this estuarine system, the alterations will be permanent only so long as repeated "kicking-out" or maintenance dredging is undertaken (a reversible commitment). The places that will be affected are within areas of environmental concern--estuarine waters and public trust areas of the estuarine system--as designated by the state of North Carolina. In the state regulations for such areas, dredging is consistent with the secondary priority use standards for development activities that require water access, i.e., navigational channels. Most of the waters surrounding the seashore will be conserved according to the highest priority management objective (North Carolina Coastal Resources Commission, 1979).

2. Recovery and Maintenance of Natural Washover Barrier Islands

Resulting from management of vehicles, a natural condition of the physical terrain will eventually be established and maintained on Core Banks/Portsmouth Island. The maze of wheel track ruts which once spread across much of the width of the islands will be confined to a transportation corridor. The impact in this corridor will be continuous because it will occur repeatedly. Most of the damage from vehicles occurs with the first few passes, but it is perpetuated by each passage. On Shackleford Banks, the condition of the terrain is more natural because it has not been affected much by vehicle use; however, it has been altered by the grazing and trails of domestic animals.

Alternative 1 (The Plan) and Alternative 2: All of Shackleford Banks (9 miles) will be free of vehicle use. All of Core Banks/Portsmouth Island is expected to attain a more natural appearance because vehicles will operate in a narrow corridor when and where necessary to protect park resources. In this corridor, vehicles will continue to affect the terrain by churning up the sand substrate; the effect will be from 2 to 4 inches deep in the damp sand and from 6 to 8 inches deep in loose sand. The sand below the surface will be compacted, creating salt pannes which can cause water to stand in the wheel ruts. These evidences of vehicle use will be erased periodically by storms, but sand movement by both wind and wave action could be increased following vehicle use (Baccus and Horton, 1979) and might cause future overwash to be unusually severe (Hosier and Eaton, 1979). This is a "worst-case" analysis. Because of the low to moderate amount of actual vehicle use anticipated and in view environmental safeguards of concentrating such use where management believes necessary to protect park resources, these impacts are not expected to occur with the same level of intensity as at other places where vehicle use is allowed. Continued use of private vehicles will support the recreational uses of fishing and hunting provided for in the enabling legislation.

Alternative 3: No vehicles would be used on Shackleford Banks. The transportation corridor along 25 miles of Core Banks south of New Drum Inlet would be widened to accommodate both private vehicles and public transport vehicles simultaneously. North of New Drum Inlet, the 21-mile transportation corridor would be narrower, as it would be used only by public vehicles. Other vehicle-related effects would be the same as alternative 1.

Alternative 4: The entire 46 miles of Core Banks/Portsmouth Island would recover over time from past use of motorized vehicles. With this recovery (a direct effect), the sand substrate would be stabilized by the invading maritime grasses, especially in the dunes, grasslands, and upper berm. These would then collect windblown sediments. Grasslands would thus become more extensive. For a washover barrier island, this grassland vegetation is important in reducing the effects of oceanic

overwash by acting as a brake in decreasing the velocity of water and trapping sand (a contributor to long-term productivity) (Hosier and Eaton, 1979).

3. Water and Sewage

Groundwater resources are not expected to be adversely affected by the withdrawals made to serve visitor needs on the park's barrier islands. Sewage facilities will be designed to standards so there will be no adverse effect on groundwater quality.

C. Impacts on Vegetation

The emphasis on preservation in managing Cape Lookout National Seashore will result in a plant cover (refer back to the graphic, Cross Section of Barrier-Island Ecological Zones) controlled by such natural processes as overwash. Vegetation will continue to be affected in development zones and within the transportation corridor.

1. Recovery and Maintenance of Natural Barrier-Island Plant Cover

more extensive cover of natural vegetation eventually develop along Core Banks/Portsmouth Island through natural barrier-island ecological processes and will maintain itself except in developed areas. The rate and extent of recovery will vary with the ecological community and the intensity of past impacts on the natural environment. Existing wheel tracks among the dunes, on overwash fans, and through sparsely vegetated grasslands will remain until overwash, aeolian drift (windblown sand), and grass regeneration occur. timeframe of recovery will be dependent on the storm climate and the conditions for natural regeneration (e.g., soil and water for plant Vehicle tracks through thickly vegetated grasslands, shrub thickets, or salt marsh are likely to remain for years. The vegetation will recover to the extent that vehicle use is allowed or disallowed in the alternatives. On Shackleford Banks, vegetative recovery will result when the owners remove their domestic animals that graze the area; however, there will be continued grazing by the herd of horses that remains.

- Alternative 1 (The Plan): Nearly complete recovery of vegetation is expected on 9 miles of Shackleford Banks and on 46 miles of Core Banks/Portsmouth Island (except in the transportation corridor, which will be located on the beach/berm or behind the dunes along 46 miles of Core Banks/Portsmouth Island, depending on the season of the year).
- Alternative 2: Same impact on vegetative cover as in alternative 1 along 46 miles of Core Banks/Portsmouth Island.
- Alternative 3: Same impact on vegetative cover as in alternative 1 along 25 miles of Core Banks south of New Drum Inlet. Partial recovery of vegetation would occur along the 21 miles of Core Banks north of New Drum Inlet served by public transportation. There would be no vehicle use on Shackleford Banks.

Alternative 4: Total recovery and maintenance of a natural vegetative cover would occur on 46 miles of Core Banks and 9 miles of Shackleford Banks.

2. Disturbance of Submarine and Marsh Vegetation

Although the sandy bottom will be followed as much as possible in the channels maintained by "kicking-out" (a mitigating measure), some submarine vegetation (e.g., eelgrass) might not be avoided. Some vegetation adjacent to the channel will possibly be blanketed with sediment. A minimal amount of vegetation may be removed in the maintenance dredging of the turning basins and the marina on Harkers Island. The extent of disturbance will depend on the dredging required by each alternative.

Alternative 1 (The Plan) and Alternatives 2 and 4: At three landing points--Shingle Point, North New Drum Inlet, and Portsmouth Village--the submarine vegetation could be disturbed by "kicking-out." Some vegetation will be chopped by propeller action or could be blanketed with sediment. Some vegetation will be removed at these landing points and at Harkers Island during maintenance dredging.

Alternative 3: Dredging of larger channels (table 2) would involve a more extensive removal or blanketing of submarine vegetation.

The areas of submarine vegetation that will be removed, if any, will be measured in the final design of the dredging program. The submarine plants--phytoplankton, benthic algae, and rooted plants of the estuarine environment--are primary producers in the food chain of marine organisms. In addition, rooted plants, especially eelgrass, are important as habitat for benthic organisms including some of commercial value. Any removal of vegetation will be a loss in primary production and habitat. The vegetation and primary productivity will also possibly be temporarily affected by oxygen depletion and release of growth stimulants and contaminants in the immediate vicinity of the dredging or disposal sites (USDI, FWS, 1977). These effects are not reasonably expected to be major, if they occur at all, under the plan. The areas at issue are not heavily populated by submarine vegetation. Disposal will not occur in the wetlands.

Any potential disturbance of submarine and marsh vegetation will not adversely affect the overall survival and quality of wetlands. These will be preserved in a natural state, which is consistent with the first priority management objectives for these public trust areas and coastal wetlands (areas of environmental concern as designated by the state of North Carolina). The activities of necessary dredging and dock and boardwalk construction are acceptable under the second priority use standards for such areas.

D. Impacts on Animals

The animals of the seashore will be indirectly affected by changes in the terrain and plant cover. Generally, the emphasis on preservation will foster more natural species compositions, behaviors, and

densities. However, where vehicles are used and channels are dredged, animals will be affected.

1. Restoration and Maintenance of Natural Barrier-Island Habitats

After plan implementation, there will be less disturbance of the native wild animals outside the vehicle corridor on Core Banks/Portsmouth Island. On Shackleford Banks, the removal of domestic cattle, sheep, and goats by their owners will have the same effect--habitat conditions will improve as described in the "Impacts on the Physical Terrain" and "Impacts on Vegetation" sections. This will affect the feeding and resting of some animals, including eastern brown pelicans and peregrine falcons (both endangered species), and the nesting of other animals, including loggerhead turtles (threatened species) and waterbirds (several are species of special concern in North Carolina). The areal extent of this improved habitat will depend on the vehicle-free areas in each alternative.

Alternative 1 (The Plan) and Alternatives 2 and 3: Animals along the 46 miles of Core Banks/Portsmouth Island will benefit from the transportation corridor because it will keep vehicles out of nesting places. Restrictions were not in place in the past, but the present and proposed controls on vehicle use are expected to lead to wildlife benefits. Especially noteworthy, in this connection, is the area north of New Drum Inlet where several species of waterbirds are found in great numbers. In the area from Cape Lookout Point to Shingle Point, except for the transportation corridor, there will also be beneficial effects. There will be no vehicles to disturb animal life on Shackleford Banks.

Nests of loggerhead turtles and the hatchlings themselves will not be affected by vehicle use that is confined to the transportation corridor; the corridor will be routed behind the dunes during the critical hatching time. If vehicles were to illegally drive on the beach/berm at this time, they could possibly be driven over the nests. The wheel tracks would be an obstacle to the hatchlings in crossing the open beach toward the ocean. They could become trapped in the ruts and head down them parallel to the water, thus being subjected to predators for a longer time and more susceptible to desiccation (USDI, NPS, 1979).

Nests of colonial-nesting birds will not be affected by vehicle use because the transportation corridor will avoid their nesting areas. If vehicles were to illegally drive through these areas, least terns, gull-billed terns, and common terns (all species of special concern in North Carolina), and black skimmers would be vulnerable to vehicles where the birds nest on the ground--beach/berm, low dunes, and tidal flats (Parnell and Soots, 1979). Least terns also nest on the barren sand behind the dunes south of New Drum Inlet. It has been observed that the birds fly up when vehicles pass at a distance (USDI, NPS, 1979), which can cause temperature changes and endanger

incubating eggs. There is some possibility that birds would adjust to the passage of the vehicles and remain on their nests, but only if vehicles were not driven through the actual nesting areas and if people stayed in their vehicles (Blodget, 1978).

When vehicles are allowed on the beach/berm, it is possible that feeding and resting shorebirds will be disturbed, especially at times of high tide. There could be flushing of feeding birds and resting flocks, including the endangered peregrine falcon and brown pelican, but no long-term adverse effect will occur.

Marine animals may be affected by vehicles passing on the beach and tidal flats. The intertidal zone is inhabited by diverse and large populations of organisms living beneath the sand surface (Godfrey, Leatherman, and Buckley, 1978). Soft shell clams might be killed if vehicles pass over them on the beach or modify their environment (Wheeler, 1978). Similarly, ghost crab populations, which occupy a mid-point in both the terrestrial and marine food chains, could be reduced along beaches where vehicles are used, but this reduction is not expected to be significant along Core Banks (Wolcott, 1981).

The number of individual animals that could be affected is not known except that it would be in proportion to vehicular traffic. Similarly, animals could be affected by an increase in visitor activity, especially where use is concentrated.

Alternative 4: Animals along the entire 55-mile length of seashore would not be disturbed by vehicles. However, hikers and campers could periodically disturb park wildlife.

Reducing disturbance of animals (a direct effect) and improving their habitat (an indirect effect) is especially important at Cape Lookout National Seashore, for it contains most of the undeveloped and natural ocean beach habitat in North Carolina. Large numbers of loggerhead turtles nest here. Moreover, the area north of New Drum Inlet has been described as one of the most impressive shorebird flats from the Outer Banks to New England (Buckley and Buckley, 1973). Along the shores of the ocean and inlets in this area, eastern brown pelicans have been seen in great numbers during the fall and winter. Improvement of the habitats at the seashore (an improvement of long-term productivity) will help to protect the endangered and threatened species and the species of special concern to the state of North Carolina.

2. Disruption of Marine Animals

Marine animals of Back and Core sounds, including benthic organisms and juvenile fish, could be repeatedly disrupted by continuous "kicking-out" of the ferryboats. Organisms living in the sediments may be stirred by the motion and may then be blanketed by sediment. Organisms that feed on suspended and deposited materials may ingest sediments during the time of "kicking-out" or dredging (USDI, FWS, 1977). Some may be destroyed. The disruption will be most severe with channel dredging (alternative 3).

The kinds of animals affected will depend on the habitat that is involved, as discussed under "Impacts on Vegetation." The benthic organisms in the submarine eelgrass beds on softer muds include clams and scallops; on the sandy bottom they include crab and shrimp; and in the marsh creeks they include juvenile fish and their food.

The following marine animals have been identified in the vicinity of the landing points (North Carolina Division of Marine Fisheries, 1976) and will possibly be disturbed by dredging: Cape Lookout-pigfish, pinfish, spot, blue crab; Shingle Point--Atlantic menhaden, pigfish, pink shrimp; North Drum Inlet--Atlantic menhaden, pigfish, spot, striped mullet, gulf flounder, pink shrimp; and Portsmouth--pigfish, pinfish, spot, red drum, striped mullet, white mullet, gulf flounder, blue crab. These animals will be temporarily disturbed wherever dredging occurs and could be repeatedly disturbed by the "kicking-out" action of the propeller with each pass of a boat.

It is difficult to determine the full ramifications of such impacts. However, resident species, especially, can tolerate wide ranges of variation in depth, salinity, temperature, and suspended sediment load in this diverse, dynamic, and always changing estuarine system (USDI, FWS, 1977).

The disruption of marine animals (an adverse effect which cannot be avoided) associated with "kicking-out" or with dredging and disposal (short-term use) will primarily affect nearby marine animals on a temporary basis. Depending on the frequency of the disturbance, the animal populations will probably recover (long-term productivity). However, it is possible that their use of the channels, as long as they are maintained, will be different than in adjacent areas or on the previously natural bottom at the sites.

At the dredge disposal sites, which will be located in the design stages of the dredging program and which may include the swash zone, some organisms will be destroyed. Others may be transported in the dredge spoil material. Those remaining are expected to rapidly recolonize the new material. This may affect populations of burrowing animals, such as mole crabs, but should not affect marine fish, which will avoid turbid waters (U.S. Army Corps of Engineers, 1976).

E. Impacts on Scenic Quality

As the barrier-island terrain, plant cover, and wildlife habitat restore to natural conditions, the overall scenic quality and the related aesthetic experiences will also be upgraded. Generally a natural seashore landscape will prevail; intrusions of man-made development will be few.

The result of recovery and maintenance of natural washover barrier-island terrain described for the physical environment, natural barrier-island plant cover described for vegetation, and natural barrier-island habitats described for animals will have the indirect result of restoring a natural barrier-island landscape. Where the landscape will eventually be free of repeated vehicle traffic in the sand, the grassland will become more extensive and there will be a thicker cover of grass. Also, more waterbird activity on the beach will add to the natural

richness of the scene. The extent of recovery will depend on the extent and character of vehicle use allowed in each alternative.

- Alternative 1 (The Plan) and Alternatives 2 and 3: The scenery along the entire length of Core Banks/Portsmouth Island (46 miles) will remain impacted by vehicle use, but wheel tracks will be mostly confined to the transportation corridor. Ultimately, there will be a restored natural landscape on Shackleford Banks.
- Alternative 4: There would be total restoration of the natural landscape except for development at ferryboat landings, historic zones, and tracts with reserved rights.

In addition, the removal of debris from the fishing camps and the junked vehicles from along the length of Core Banks will eliminate man-made clutter and improve the natural quality of the seashore.

- Alternative 1 (The Plan): The scenic quality will benefit when the existing clutter is removed. The camping shelters that will be built in two of the existing fish camps on Core Banks will intrude on the local natural scenic quality.
- Alternative 2: Some remaining rental cabins would continue to intrude on the natural scenic quality.
- Alternative 3: New cabins would be built at three landing points.

 Although the natural scenic quality would be affected, proper design and landscaping would improve their appearance.
- Alternative 4: All structures would be removed except those in historic districts and at landing points, and scenic quality of the seashore would be enhanced.

The proposed restoration of the natural barrier-island scenery (an indirect effect) will be significant in that it will be a unique situation for the North Carolina coast and for the majority of the Atlantic Coast of the United States. Most of the barrier islands, even those in public ownership, have been so extensively altered by man that restoration to a natural appearance could not be readily achieved.

F. Impacts on Cultural Resources

The cultural resources will be maintained and preserved to the greatest extent possible.

1. Intrusion of Development

In Portsmouth Village, the interiors of some structures will be used for visitor interpretation, administration, and maintenance. Visitors may also wander along the existing lanes through the village to view the historic structures. The ferryboat landing dock in Portsmouth Village will intrude somewhat on the historic district, but that effect will be minimal. Moreover, a boat dock is compatible with a fishing village.

The potential for intrusion on the lighthouse complex varies with the alternative.

- Alternative 1 (The Plan) and Alternative 4: If the lighthouse complex can be maintained, the interior of the keeper's quarters will be adapted for use as public restrooms. Visitors may roam within the complex to view the exteriors of the other structures.
- Alternative 2: The existing comfort station at the lighthouse would remain as an intrusion. The lighthouse complex would be available for visitor use as in alternative 1.
- Alternative 3: There would be overnight cabins within 1 mile of the lighthouse complex, but this would not constitute a significant intrusion.

The adaptive use of building interiors will not alter the quality of the historical, architectural, or cultural characteristics that qualify the properties for inclusion in the National Register.

The significance of the Cape Lookout lighthouse as an important physical and historic feature of the Outer Banks (significant at the state level) will not be affected.

The charm and significance of the Portsmouth Village historic district will not change either. It is the only cultural resource of its type remaining within the national seashore boundaries. The exteriors of the buildings in the village will not be altered, but the grounds around them, the lanes, and the grass aircraft landing strip will be mowed periodically. The ferryboat dock and aircraft will constitute adverse effects--the introduction of visual or audible elements that are out of character with the historic district. However, the dock does relate to the historical, sea-oriented activities of the village. It will probably be at a presently cleared site on Coast Guard Creek, but its precise location will be determined during the design phase of this project. Private vehicles will be parked on the periphery of the village while their occupants explore it on foot.

2. Concentration of Visitors

Seashore visitors will tend to concentrate at the Cape Lookout lightouse and Portsmouth Village, which might result in trampling of the grounds, wear on the structures, and vandalism. The magnitude of such impacts will depend on the visitation associated with each alternative.

- Alternative 1 (The Plan) and Alternative 2: Visitors will have a moderate effect in the historic zones. The potential for damage will become more severe if unauthorized use of private vehicles occurs through the historic zones.
- Alternative 3: Effects from concentrations of visitors would be greatest with the higher level of visitation in this alternative. The potential for damage would be increased by unauthorized

vehicle use, as in alternatives 1 and 2, and by the presence of overnight cabins in the nearby Cape Lookout Point area.

Alternative 4: There would be little effect because of low expected visitation and total absence of private vehicles.

These impacts from visitors will be partially reduced by more intensive management in these historic zones.

G. Impacts on Seashore Use

The manner in which visitors will have access to beach-oriented activities will depend on the alternative. Visitors will continue to be mostly self-sufficient and will be encouraged to participate in experiences having only limited impacts on the barrier-island environment of Cape Lookout National Seashore.

1. On-Island Transportation

Private motorized vehicles will be used for travel on Core Banks/Portsmouth Island, but foot travel will be the only way to get around on Shackleford Banks.

- Alternative 1 (The Plan) and Alternative 2: Visitors may continue to ferry their private vehicles to the seashore and drive along all of Core Banks/Portsmouth Island (46 miles); visitors without cars may ride on public transportation for only 3 miles at Cape Lookout Point. The option of extending the public transportation system northward, when warranted, is left open in the plan, but this is not considered feasible under alternative 2. On Shackleford Banks (9 miles), visitors will continue to travel on foot, and there will be no new influence of vehicles or their impacts on that barrier island.
- Alternative 3: Impacts would be similar to alternatives 1 and 2; however, visitors would be limited to driving private vehicles on 25 miles of seashore south of New Drum Inlet, and the public transportation system would extend along the entire length of Core Banks/Portsmouth Island (46 miles). This alternative would give visitors the greatest accessibility but would provide the least area (9 miles on Shackleford Banks) where there would be no influence from vehicles or their impacts.
- Alternative 4: Without a public transportation system or private vehicle use, all visitors would walk in order to travel on the barrier islands. There would be no influence from vehicles.

Those visitors who have been driving vehicles on Core Banks/Portsmouth Island in the past will not be affected by the plan. The mobility of those with rights of occupancy at the seashore will not be restricted. Vehicle use will make it easier for the young, elderly, and handicapped to travel around the national seashore.

Under alternative 3, those visitors using the transportation system would have to wait until the vehicle passed by to move a distance up or down the island. Also, they would have to carry their gear from

the transportation corridor to where they wanted to be on the beach, and back. The public transportation system would provide access for the young, elderly, and handicapped in the national seashore. Potential conflicts could continue on the beach/berm between vehicle operators and pedestrian users.

Conservation of energy would result from the use of the public transportation system in alternative 3. Tests show gasoline consumption of a private four-wheel-drive truck on the beach to be 9.2 miles per gallon for 25 mph maximum speed, which averages 6.5 miles per gallon less than road driving for the same vehicle (USDI, NPS, Cape Hatteras National Seashore staff, 1979). In addition to paying gasoline costs, visitors who transport their own vehicles to the islands presently pay \$50 round trip, plus the cost of maintaining their vehicles in the harsh coastal environment, which causes damage from salt spray and sand weathering.

2. Changes in Overnight Use

The overnight visitor use on the isolated barrier islands of Cape Lookout National Seashore will depend on the numbers of cabins and/or campsites available in each alternative. Resort-type development such as motels, restaurants, amusements, and shops will not be provided in this remote and natural setting. The overnight facilities and tourist experiences available on the adjacent barrier islands of Bogue Banks and Cape Hatteras National Seashore will not be duplicated.

- Alternative 1 (The Plan): Overnight use will be primitive camping, with water and sanitation facilities provided at some landing points and camping shelters. Most visitors will probably use the facilities provided on the mainland and adjacent barrier islands.
- Alternative 2: There would be opportunities for both primitive camping and staying in the cabins remaining in the fish camps.
- Alternative 3: The largest amount of overnight use would occur, with the greatest choice of overnight accommodations: new cabins would replace old ones in fish camps; there would also be five campgrounds and primitive camping.
- Alternative 4: Primitive camping would be dispersed, and there would be no cabins or shelters.

The type of use will not change for those visitors who have been staying in the old fish camps, but the facilities will probably invite new visitors. Others will continue to use the existing or new overnight accommodations off the seashore. There will be no effect on the overnight use of those holding rights of occupancy on the seashore; they may continue to use their own structures under the terms of the rights. Neither will the Coast Guard be affected.

This low level of development planned will probably lead to an emphasis on day use activities at the seashore. Visitors patronizing private overnight accommodations will benefit Carteret County's economy (an indirect effect) as described under the "Impacts on Harkers Island and the Region."

3. Changes in Recreational Opportunities

Generally, the same activities, most of which are beach-oriented--swimming, fishing, surfing, beachcombing, picnicking, etc.--will continue at Cape Lookout National Seashore. The access and support systems by which they are accomplished (transportation and overnight accommodations) will be affected as discussed previously. There are expected to be no real changes in visitor use of the seashore.

H. Conclusions

The following summarizes the impacts of the plan, or alternative 1, on each environmental element. The relative magnitude of the impacts among the four alternatives was addressed in the Impact Comparison table at the end of the "Alternatives Including the Proposed Action" section.

1. Impacts on Harkers Island and the Region

The socioeconomic environment of Harkers Island and Carteret County as a whole will be affected by park visitors. Impacts from the tourist trade, and impacts on sport and commercial fishing, are generally consistent with local objectives as expressed in the <u>Carteret County Land Use Plan</u>. Visitor traffic will compound an existing problem, and impacts on land use and local traditions will only accelerate changes which are already occurring. A moderate contribution to these impacts is expected from the plan.

2. <u>Impacts on the Physical Environment, Vegetation,</u> Animals, and Scenic Quality

The natural configuration of dunes and grasslands will eventually be more extensive. There will be an increase in plant cover, particularly more extensive natural grasslands; less disturbance of wildlife, especially turtle and bird nesting; and a less disturbed natural seashore landscape. With proper vehicle management, there will be no adverse effect on endangered or threatened species. Thus the outstanding natural and recreational values of the seashore will be perpetuated for public use and enjoyment in keeping with PL 89-366 (establishment of Cape Lookout National Seashore); natural, aesthetic, and scenic values will be less adversely affected; and the natural resources of Carteret County will be preserved.

The minor adverse impacts from "kicking-out" maintenance dredging of channels to the islands cannot be avoided. The bottom sediments and bathymetry, the submarine vegetation, and the marine animals will all be affected to a minor degree. (This is an acceptable activity, of second priority, in a North Carolina area of environmental concern.) Development at the landing points will involve no appreciable amount of wetlands along the sound shoreline, and there will be no adverse effect on the overall survival of the wetlands. under consideration were disrupted prior to areas management, and the proposed use is merely a continuation of prior use. No additional adverse effects are expected.

3. Impacts on Cultural Resources

The scenery of the historic complex at the Cape Lookout lighthouse and of the historic district at Portsmouth Village will be intruded upon by new development in the vicinity. However, the extent of degradation will not alter the qualities that made these properties eligible for entry on the National Register of Historic Places.

4. Impacts on Seashore Use

Present park visitors will notice little change in the way they use Cape Lookout National Seashore. They will still participate in the same beach-oriented activities, with some improvements. Private vehicle use will continue, and limited public transportation will be provided through a concessioner. Overnight use will be limited to primitive camping, with camping shelters provided at the fish camps. Emergency response time will be minimized, enhancing visitor safety, and the park staff will be able to efficiently monitor and protect park resources.

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VI. LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS TO WHOM COPIES OF THE STATEMENT HAVE BEEN SENT

Federal

Advisory Council on Historic Preservation Department of Agriculture Department of the Army Corps of Engineers, Wilmington District Department of Commerce National Marine Fisheries Service Department of the Interior Bureau of Land Management Heritage Conservation and Recreation Service Fish and Wildlife Service Geological Survey Water and Power Resources Service Department of Transportation Coast Guard Environmental Protection Agency Federal Emergency Management Agency Federal Insurance Administration North Carolina Congressional Delegation

State

Office of the Governor State Clearinghouse State Historic Preservation Officer Coastal Zone Management Commission

County and City

Atlantic Beach Town Council
Beaufort Town Commissioners
Carteret County Chamber of Commerce
Carteret County Commissioners
Carteret County Economic Development Council
Emerald Isle Town Council
Morehead City Town Commissioners
Newport Town Council
Pine Knoll Shores Town Council

Others

Audubon Society, New Hope Chapter, Chapel Hill Barrier Island Coalition, New York Clemson University (Dr. Gene Wood) Conservation Council of North Carolina, Durham Conservation Foundation, Washington, D.C. Friends of the Earth, San Francisco, California
Hampton Mariners Museum, Beaufort
National Parks and Conservation Association, Washington, D.C.
Nature Conservancy, Raleigh
North Carolina Beach Buggy Association, Nags Head
North Carolina State University (Dr. Paul Hosier)
Outer Banks Preservation Association, Buxton
Sierra Club

Cape Fear Group, Wilmington
Cypress Group, Greenville
Joseph LeConte Chapter
The Wilderness Society, Atlanta, Georgia
United Mobile Sportfishermen, Inc.
University of Massachusetts (Dr. Paul Godfrey)
University of Virginia (Dr. Robert Dolan)

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APPENDIXES

APPENDIX A: ADMINISTRATIVE SITE SELECTION

1. Background

PL 89-366, approved March 10, 1966, providing for the establishment of Cape Lookout National Seashore, contained the following paragraph:

(e) The Secretary of the Interior is authorized to purchase with donated or appropriated funds, or acquire by exchange, not to exceed one hundred acres of land or interests in lands at or near Beaufort, North Carolina, as an administrative site, and for a landing dock and related facilities that may be used to provide a suitable approach or access to the seashore.

PL 89-366 was amended by PL 93-477, October 26, 1974, in which the administrative site location was designated at the east end of Harkers Island as shown on the legislative map. All 91 acres for the administrative site/gateway port have been acquired.

Following public review of the <u>Environmental Assessment</u>, released in February 1978, the regional director said that "responses from the public and the State of North Carolina expressed concern over development of this (east Harkers Island) site. This concern is acknowledged, and, during the preparation of the draft Environmental Statement, alternative sites will be further investigated." That has been done.

Accordingly, a meeting was held on February 27, 1979, in Morehead City, attended by an ad hoc committee of the North Carolina Coastal Resources Commission and the North Carolina Marine Resources Council, with the NPS planning staff. During that meeting, a presentation was made by the NPS planning staff substantially as follows.

2. Site Considerations

It was assumed that, for the foreseeable future, most visitors to Cape Lookout National Seashore would find overnight accommodations in the Bogue Banks-Morehead City-Beaufort area, and would want to visit the Cape Lookout Point area. Travel distances by land and by water were calculated to various shoreline points free of bordering marshes, where a landing dock could be provided. The following places, all within 25 miles by road from Bogue Banks and 14 miles by water from Cape Lookout Point, were considered (see map, Locations Considered for Administrative Site, and table 6).

Table 6: Administrative Site Locations Considered

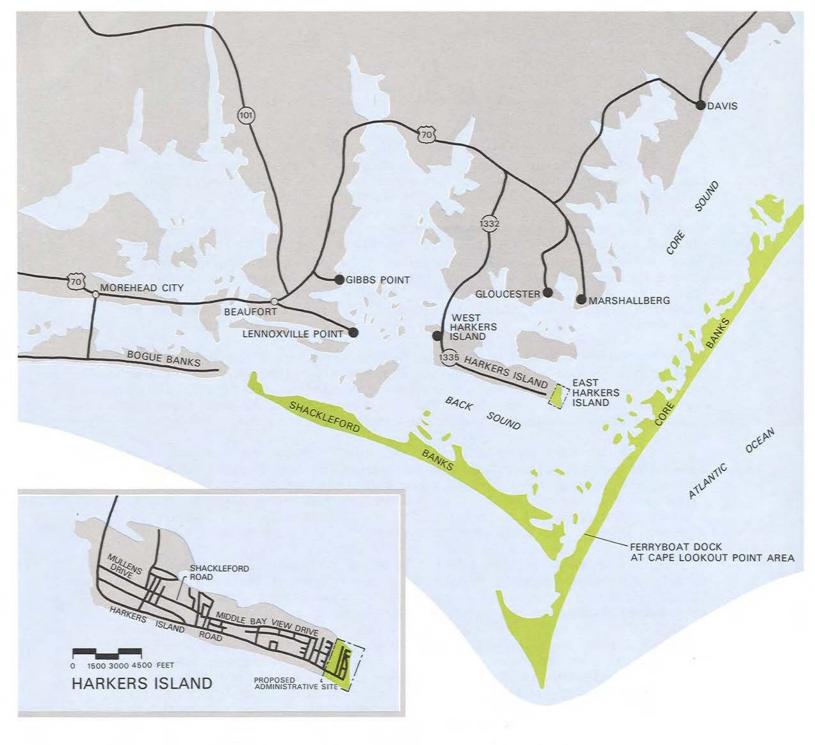
Name of Place	Road Distance from Bogue Banks (miles)	Water Distance to Cape Lookout Point (miles)
Name of Flace	******	(iiiies)
Lennoxville Point	8	8.6
Gibbs Point	8	10.1
Gloucester	21	7.6
West Harkers Island	20	7.7
Marshallberg	20	7.5
Davis	24	13.5
East Harkers Island	24	3.5

It is obvious from this table that total travel distance alone was not a ruling factor in the decision. Other considerations were more important, such as visitor safety in case of an evacuation of the islands required by an approaching storm, and day-to-day ferryboat and NPS boat operating costs.

Each site was examined as to buildable land (estimated at a minimum of 50 acres) to accommodate the needed facilities--boat basin, ferryboat landing, docks for NPS maintenance and patrol boats; dredging required for boats to reach a public channel maintained by the Corps of Engineers; disturbance of wetlands; soil suitability for sewage disposal; potable water source; and suitable land for vehicle parking lot, visitor center, comfort stations, picnic area, foot trails, administrative offices, maintenance compound, residences for full-time personnel and seasonal staff, and the like--all designed for use by the handicapped. Space was also considered necessary for possible future expansion and an adequate buffer to separate the functions from adjacent private property.

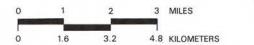
All of the sites examined already support a range of development. At Marshallberg, there is a commercial harbor, boatworks with marina and railway, private dwellings, and retail stores. Lennoxville Point has its fish processing plant and subdivided land with over 100 homes. At Gloucester there are a few homes and good farmland. West Harkers Island has much "made" open land and includes a Harbor of Refuge. State road access to Gibbs Point and Gloucester would need to be improved, if either site was selected.

An analysis of the east Harkers Island site for the gateway port revealed that it has constraints also as well as advantages. Settlement of Harkers Island began in the 1890s when Shackleford Banks was abandoned following a series of storms. The villagers had few contacts with outsiders. Their common dependence on the sea for their livelihood through fishing and boatbuilding and isolation from other people produced a cohesiveness of culture marked by a closely knit, family-oriented society and a dialect somewhat distinct from the other residents of "down-east" Carteret County. In 1940, a highway bridge was built to the mainland, and electric power came later in that decade. These two events brought about dramatic changes in the island and the lifestyle of its



PROPOSED ADMINISTRATIVE SITE

ALTERNATIVE ADMINISTRATIVE SITE





LOCATIONS CONSIDERED FOR ADMINISTRATIVE SITE

CAPE LOOKOUT NATIONAL SEASHORE / NORTH CAROLINA UNITED STATES DEPARTMENT OF THE INTERIOR / NATIONAL PARK SERVICE

623 | 40003 DSC | SEPT 79 residents. Culturally and physically the island has changed irreversibly and irretrievably.

Harkers Island Road, SR 1335, is 4 miles long and serves as the main street of the village. Along it are numerous homes, 11 stores, four marinas, five motels, and three restaurants. Although boatbuilding and fishing comprise the principal livelihood of many villagers, others provide goods and services for residents and visitors. Still others commute to jobs on the mainland; many of the jobs are federal, such as the U.S. Coast Guard and the U.S. Marine Corps Air Station at Cherry Point. There is a growing community of retirees and people occupying second homes seasonally. Most of the undeveloped land on Harkers Island today is platted for subdivisions. There is little space for commercial growth except on the roads, US 70 and SR 1332, between Beaufort and the island.

Harkers Island is the fifth largest township of Carteret County. It has experienced a 20% population increase from 1960 (1,368 permanent residents) to 1970 (1,639 permanent residents and 2,000 summer residents), and the projected influx of people for 1980 was significant (2,000 permanent residents and 2,300 summer residents).

Water and electricity are available through the Harkers Island Water and Sewage Corporation and the Harkers Island Electric Membership Corporation, respectively, which have ample reserves to accommodate NPS needs at the administrative site. Although central sewage is not now available, the NPS will connect to it if it is constructed. Otherwise, the NPS will develop its own treatment system.

The east Harkers Island site is composed of southern pine forest with some clearings (65%), developed areas (15%), plus marshes (20%). There is a saltwater marsh on the north shore of the area and a freshwater marsh in the west-central portion. The forest, which is predominately loblolly pine with some mixed hardwoods, lends itself to an excellent buffer zone separating NPS development from existing community development. It provides a diverse habitat for numerous species of birds, reptiles, and small mammals; however, there are no endangered or threatened species on the site. Carteret high and Leon fine sand soils are found there. The former is in the irregularly flooded salt marsh and this soil has a very severe limitation for development. The other soil underlies all the rest of the site. It has a severe limitation for development and requires sensitive construction techniques. As a whole, the site is flat, with the highest elevation at 11 feet. The central portion is above the 100/500-year floodplain contour; the northern and southern areas are below it. Prevailing winds are from the southwest in winter, spring, and summer; from the northeast in autumn. The eastern shoreline of the site is eroding 3 to 6 feet per year.

According to the 1976 NPS Archaeological and Historic Resources Assessment, there are none of these resources at the site which are listed in or justify nomination to the National Register. The southeast corner of the east Harkers Island site was once known as Shell Point because of an extensive shell midden; but in the early 1900s, the shells were excavated for road base material. The remains are

underwater in the sound and have been inundated by channel sediment movement. The remaining shells are exposed only at low tide.

The east Harkers Island site has had a combination of residential, commercial, and recreational use, although most of the site has not been developed (approximately 70 acres). There were two marinas, two motels, a restaurant, several resort cabins, an approved subdivision with roads and utilities, seven dwellings, and 16 trailers (May 1980).

An objection expressed by some to the use of east Harkers Island for the administrative site is that its presence would further disrupt community life. This cannot be fully mitigated. The land buffer on the NPS site will separate NPS functions from adjacent private property, but visitors' automobiles must cross the island to reach the administrative site. Presently, SR 1335 is the only means of access and passes through the center of the community. This road is narrow with many curves that reduce sight distance and increase traffic hazards. A road across the north (back) side of the island will bypass the center of the village and have a safer alignment.

All sites considered are entirely or partially below the 100-year floodplain, but nearly half of the east Harkers Island site is within the 100/500-year floodplain. Whenever there is a practical alternative, development should be avoided in the 100-year floodplain (EO 11988).

From the foregoing analysis, it is apparent that each of the seven sites considered has its advantages and disadvantages. Each would disrupt the surrounding community to a greater or lesser extent. At the suggestion of the ad hoc committee, the NPS planning team has given no further consideration to any of the sites except the two on Harkers Island.

To utilize the west Harkers Island site, 89 acres would have to be purchased from private parties who own about a half-dozen structures (residences and a boat house). Salt marsh comprises 17% of the site; another 28% is fast land formed by depositing dredge spoil over salt marsh. A high water table exists under most of the remaining land. Thus, at least 74% of the land has severe or very severe limitations for development. There is noise and visual intrusion on the site from the main road on Harkers Island (SR 1335). The Harbor of Refuge would have to remain accessible to the public for safe boat anchorage during storms.

Relocating the administrative site now would delay development of the seashore by many years. Nothing could be done until Congress approved the change and provided funds for acquisition, the land was acquired, the site plan was drawn, and funds were appropriated for construction.

The existing site on east Harkers Island, if abandoned now by the NPS, would probably be sold as surplus government property. How the buyers would use the land is purely speculation, but some residents are concerned that the end result could be more adverse than beneficial to their community.

APPENDIX B: EVIDENCE OF COMPLIANCE

Historic Preservation Act, Endangered Species Act, EO 11988 (Floodplain Management)

Advisory Council On Historic Preservation

1522 K Street, NW Washington, DC 20005

MAR 33 1982

Mr. Robert M. Baker Regional Director Southeastern Regional Office National Park Service 75 Spring Street, SW. Atlanta, GA 30303

Dear Mr. Baker:

The Memorandum of Agreement for the General Management Plan for Cape Lookout National Seashore, North Carolina, has been ratified by the Chairman of the Council. This document constitutes the comments of the Council required by Section 800.6(c)(3) of our regulations. A copy of the Agreement is enclosed.

The Council appreciates your cooperation in reaching a satisfactory resolution of this matter.

Sincerely,

Jordan E. Tannenbaum

Chief, Eastern Division of

Project Review

Enclosure

Advisory Council On Historic Preservation

1522 K Street, NW Washington, DC 20005

MEMORANDUM OF AGREEMENT

WHEREAS, the National Park Service (NPS), Southeastern Region, has submitted the General Management Plan for Cape Lookout National Seashore, North Carolina, for review in accordance with the 1979 Programmatic Memorandum of Agreement to the Advisory Council on Historic Preservation (Council), NPS, and the National Conference of State Historic Preservation Officers; and,

WHEREAS, NPS has proposed measures to avoid or mitigate adverse effects of this Plan on properties eligible for or included in the National Register of Historic Places;

NOW, THEREFORE, it is mutually agreed that the Plan will be carried out in accordance with the Programmatic Memorandum of Agreement and NPS-28.

Advisory Council on Historic Preservation

(date) 3-11-82

North Carolina State His

Preservation

(date) 3.16.82

Advisory Council on Historic Preservation

2 Aldrick (date

L7617 SER-763

NOV 6 1981

Memorandum

To: Area Manager, U.S. Fish and Wildlife Service

From: Regional Director, Southeast Region

Subject: Biological Assessment, Cape Lookout GMP

Enclosed is a copy of the Biological Assessment we have prepared for Cape Lookout National Seashore's proposed General Management Plan. For the most part, the plan proposes a continuation of present visitor use and resource protection programs. Minimal development of boat docking facilities will be proposed, and wilderness suitability is being evaluated for portions of the seashore.

Our analysis leads to the conclusion that implementation of proposals contained within the seashore's forthcoming General Management Plan will have no effect on federally-listed endangered or threatened species. However, as we have done in the past, the National Park Service intends to maintain close contact with your office to assure that these endangered and threatened species are managed properly as part of the seashore's resources.

Any response you may have concerning our conclusions as to the potential effects on endangered species will be included as an appendix to the Environmental Impact Statement we are preparing to support the seashore's General Management Plan. Although we have not finalized these documents, the National Park Service will also be responding to the comments the Fish and Wildlife Service submitted as part of the public review/comment period on the seashore's Draft General Management Plan/Draft Environmental Impact Statement. You will of course be afforded an opportunity to review the General Management Plan and Final Environmental Impact Statement when we have finalized these for distribution to the public.

We hope that the spirit of cooperation that exists between our agencies continues to benefit park resources.

NEAL G GUSE DELET

Enclosure

BIOLOGICAL ASSESSMENT OF ENDANGERED AND THREATENED SPECIES OF CAPE LOOKOUT NATIONAL SEASHORE FOR THE GENERAL MANAGEMENT PLAN/WILDERNESS PROPOSAL/DEVELOPMENT CONCEPT PLAN

PURPOSE

The following is intended to satisfy the requirements of Section 7 of the Endangered Species Act. The purpose of this Biological Assessment is to evaluate the impacts of the proposed General Management Plan for Cape Lookout National Seashore on federally-listed endangered and threatened species and their critical habitats. The brown pelican (Pelicanus occidentalis), Arctic peregrine falcon (Falco peregrinus tundrius), Atlantic leatherback sea turtle (Dermochelyidae coriacea coriacea), and Atlantic loggerhead sea turtle (Caretta caretta) have been identified as the endangered or threatened species which may be present at Cape Lookout National Seashore (CALO).

PROJECT SETTING

CALO, in Carteret County, is located on North Carolina's Outer Banks. (Refer to the "Vicinity" map). Three barrier islands—Core Banks, Portsmouth Island, and Shackleford Banks—make up the national seashore, which extends generally north and south for 55 miles and encompasses 28,400 acres. There is no bridge access from the mainland to the national seashore.

From ocean to sound, there is the distinct ecological zonation characteristic of washover and dunefield barrier islands, including the beach/berm, dune, grassland, shrub thicket/maritime forest, and saltwater marsh. Except for the few remaining cabins and off-road vehicle (ORV) use, the islands are generally in a natural condition.

As stated in the park's enabling legislation (P. L. 89-366), Cape Lookout National Seashore is administered "for the general purposes of public outdoor recreation, including conservation of natural features contributing to public enjoyment." Preparation of a General Management Plan/Development Concept Plan, to be consistent with preservation and use objectives for the seashore, and a review of seashore lands for wilderness suitability are requirements of subsequent legislation (P. L. 93-477). The draft plan and draft environmental impact statement received public review from August 1 to October 13, 1980.

THREATENED AND ENDANGERED SPECIES PRESENT

The list of endangered and threatened species at CALO have been identified in A Preliminary Resource Inventory of the Vertebrates and Vascular Plants of Cape Lookout National Seashore, which was based on literature reviews and field observations. The North Carolina Division of Parks and Recreation and the State Natural History Museum were consulted about any additional species in the vicinity. The location and activities of the endangered and threatened species at the seashore have been reported from four years of field observations by the NPS staff.

The Atlantic loggerhead sea turtle nests at Cape Lookout near the northern limit of its nesting range. During the nesting season, from late May to late August, the female turtles nest on the berm of wide sloping beaches or near the base of the dunes. Hatching occurs from late July to late October.

During the past 5 years, research teams have monitored a 7-mile stretch of beach in the vicinity of Cape Lookout Point. Nesting turtles were tagged, and the number of nests and their locations were recorded. There have been an average of four nests per mile in this section. During the 1979 season, the number of nests occurring on approximately 40 miles of beach along Core Banks was monitored by helicopter. There was an average of one nest per mile in this section.

Brown pelicans are common at the seashore. As many as 200-300 birds are seen on some days. The pelicans "loaf" on the park's beaches and take fish from the waters near the shore.

The Arctic peregrine falcon is a fall migrant at the seashore, and three to four individuals a day have been observed. The falcons hunt for their avian prey in all habitats across the islands, but hunting occurs primarily in the marshlands and on the ocean beaches. They also have been seen on the ocean beach and the tidal flats of Portsmouth Island.

The only recorded nesting of the Atlantic leatherback sea turtle at the seashore was in 1966.

Difficulties Encountered in Obtaining Data and Completing the Study

There was no difficulty in identifying the endangered and threatened species at the seashore, and the data obtained were considered to be adequate for assessing the impacts from the plan.

PROPOSED ACTIVITIES

The plan, which will guide the management of CALO for the next 5-10 years, is basically a continuation of existing use with minimal development (see the "General Development Plan" graphic). Present use of ferry services is only about 10 percent of capacity, and as such, proposed use of enlarged boats along with dredging to accommodate such boats, will not be part of the proposal for visitor use at CALO. On the adjacent Harkers Island, a visitor center/administrative/maintenance facility will be established. A ferryboat service will be provided from Harkers Island to the seashore islands of Shackleford Banks and south Core Banks, from Davis and Atlantic to 2 other points on Core Banks, and from Ocracoke Village at Cape Hatteras National Seashore to Portsmouth Island. Limited facilities for visitor activities and management, as identified on the development plan graphic, will be located on Core Banks--120 acres at Cape Lookout Point, 4 acres at Shingle Point and 4 acres at North New Drum Inlet; on Shackleford Banks--2 acres at the east and west landing sites; and on Portsmouth Island--10 acres at Portsmouth Village. An on-island transportation system will be furnished for 3 miles between the landing point near Cape Lookout Lighthouse and Cape Point. An estimated 2,990 acres, all on Shackleford Banks, is being proposed by the NPS for inclusion in the National Wilderness Preservation System.

Private vehicle use will be permitted along Core Banks/Portsmouth Island, but the vehicles will be confined to a designated corridor. Based on the findings of on-going studies on ORV use and the results of future studies, management will identify the corridor route that will minimize ecological impacts. A 3-mile section of beach in the vicinity of Cape Lookout Point, where the greatest concentration of turtle nesting occurs, will be closed to vehicles during the hatching season. There will be no ORV use on Shackleford Banks.

DETERMINATION OF POTENTIAL IMPACTS

None of the plan elements are expected to affect peregrine falcons. Pelicans nest on 3 sets of islands in Ocracoke Inlet, but not on seashore lands. Ferryboats to Portsmouth Village are currently in operation, passing more than a mile from the nesting islands, and the pelicans are not startled from their nests as a result of this ferryboat service. Other visitor use activities and proposals in this plan are not expected to affect peregrines or pelicans.

Research is needed on the potential impact of ORVs on the turtles. Wheel tracks in the sand can act as obstacles for the turtle hatchlings, leaving them more vulnerable to predation and desiccation. Also, it has been observed that some vehicle tracks have run directly over nests, possibly crushing some eggs.

Research is also needed to determine if the lighthouse affects hatchlings. There is a possibility that hatchlings near the lighthouse crawl toward it rather than to the ocean, again leaving them more vulnerable to predation and dessication.

Research on these questions will be initiated in 1982 and if the results indicate there is an impact, appropriate protective measures will be taken--through traffic control and/or the moving of nests. Further consultation with U.S. Fish and Wildlife Service will be initiated at that time.

NPS Conclusions Concerning Impacts on Threatened and Endangered Species

The disturbance of endangered and threatened species is not anticipated at Cape Lookout National Seashore under the plan. The condition of all wildlife habitats except for 142 acres affected by development (less than 1 percent of seashore lands) will be, for the most part, confined to a designated corridor. This will restore and maintain the natural integrity of the barrier-island environment.

The National Park Service does not expect that existing or proposed visitor use will have any effect on brown pelicans or peregrine falcons. These birds will continue to rest and nest over a large area of the seashore. Moreover, based on available data, NPS expects no impact on sea turtles.

NPS concludes that the General Management Plan/Development Concept Plan and the wilderness proposal for Cape Lookout will have no effect on endangered and threatened species. The National Park Service has maintained close contact with the U.S. Fish and Wildlife Service in the past to protect these species at Cape Lookout. This contract will continue as plans for the seashore are implemented.

memorandum

DATE: December 9, 1981

MEPLY TO Area Manager, FWS, Asheville, NC (SE/T)

Biological Assessment, Cape Lookout General Management Plan (Re: 4-2-79-A-593)

Regional Director, National Park Service, Southeast Region, Atlanta, GA

We have reviewed the subject biological assessment regarding the brown pelican (Pelecanus occidentalis), Arctic peregrine falcon (Falco peregrinus tundrius), Atlantic leatherback sea turtle (Dermochelys coriacea coriacea) and Atlantic loggerhead sea turtle (Caretta caretta) for the General Management Plan for Cape Lookout National Seashore located in Carteret County, North Carolina, as submitted by cover memorandum of November 6, 1981.

Although we still have some reservations regarding the impact upon the loggerhead turtle from increased visitor use, we have no information to refute a conclusion of no affect, especially in light of the indicated flexibility on page four to take protective measures if impacts materialize. We assume this flexibility extends to possible impacts other than the two mentioned; for example, including impacts from increased visitor use. Therefore, we accept the biological assessment as adequate and supportive of the conclusion of no affect with which we concur. In view of this, we believe that the requirements of Section 7 of the Endangered Species Act have been satisfied in regard to the proposed General Management Plan. We recognize, however, the need for continuing informal consultation regarding detailed implementation plans as they are developed in order to recognize potential effects at an early stage and eliminate those adverse to the species as you have indicated in the biological assessment.

We assume that the conflicting statements regarding effects on listed species in the Final Environmental Impact Statement, as pointed out in our August 14, 1981, memorandum, will also be removed as was done with the biological assessment. We also reiterate our request for the information addressed in the second paragraph of our August 14, memorandum.

Your interest and initiative in enhancing Endangered and Threatened species is appreciated. We look forward to maintenance of continuing close contact between our agencies in the interest of protecting these species at Cape Lookout.

cc:

Director, FWS, Washington, DC (OES)
Regional Director, FWS, Atlanta, GA (ARD-FA/SE)
Field Supervisor, FWS, Raleigh, NC

STATEMENT OF FINDINGS General Management Plan/Development Concept Plan Cape Lookout National Seashore

Introduction

At Cape Lookout National Seashore, North Carolina, the National Park Service is proposing certain management and development actions in areas subject to periodic flooding. Information supplied by the Federal Insurance Administration indicates that virtually all of the area of concern here would be inundated by storm surges with recurrence frequencies of once in 100 and 500 years.

Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands) and their implementing guidelines direct federal agencies to avoid long or short-term adverse effects associated with occupancy or modification of floodplains and wetlands unless there is no practicable alternative. In the present case, the adverse effects are the possibility of loss of life and property. The natural values of floodplains and wetlands will not be affected.

A review of alternatives to avoid or minimize adverse impacts has been undertaken. The proposed level of development is considered the only practicable alternative in view of the need for visitor services and resource protection. However, with design details to reduce flood damage and with evacuation plans implemented, the adverse effects of the alternative are expected to be minimized.

Alternatives Considered

The proposed development would occur at: the existing East Harkers Island administrative site--most of the development here (housing, park offices and maintenance facilities) would be located outside the 100-year floodplain; Cape Lookout Point; Shingle Point; North New Drum Inlet; Portsmouth Village; and Shackleford Banks.

The only alternative to undertaking the minimal developments proposed is to take no action to develop visitor and administrative facilities. The seashore would be totally devoid of facilities to provide for visitor use and resource protection.

Rationale for General Development

The no action alternative would limit the types and levels of visitor use potentially available at Cape Lookout National Seashore. Pedestrian access would be a primary method of participating in the primitive recreation opportunities that would be available; many of

the very young, elderly and physically handicapped could be virtually eliminated as potential seashore users. Because of the lack of facilities, the ability of the park to protect visitors and resources would be hampered.

The minimal level of development (visitor contact stations, parking areas, boat docks, picnic areas, overnight shelters, offices, limited park housing) proposed in the park's plan provides a balance between visitor use and resource protection. Active and passive types of recreational pursuits will be provided to meet demand in the context of a relatively pristine barrier island system. The administrative support facilities are expected to enhance the ability of park management to respond to emergencies involving visitor safety and resource protection.

The proposed developments will be designed to minimize the potential for flood-related damage; the structures will be elevated on pilings to avoid high water. Existing structures will be marked to delineate the height of expected flooding. In addition, the park has an approved storm preparedness plan that provides for early warnings of impending storms and evacuation of visitors and management personnel from the park. The risk of loss of life, even to overnight users of the park, will thus be avoided.

Structures are being proposed at Shingle Point and North New Drum Inlet to provide shelter for fishermen and other users choosing to stay overnight on the park's outer banks. No other overnight facilities are available on the outer banks, but night use is important especially to fishermen since the larger fish are caught at night. The proposed overnight shelters are expected to facilitate this important recreational use. Alternatively, the overnight shelters could be abandoned as a concept on the outer banks. But a customary use would be precluded, and a portion of the park's visiting public would not be afforded the opportunity to stay on the outer banks for extended periods of time (7-12 days) fishing, sunbathing, hiking, and participating in other recreational pursuits available at Cape Lookout National Seashore. Given the mission of the National Park Service, this is not a practicable alternative.

Conclusion:

The proposed development at Cape Lookout National Seashore will be located within the coastal floodplain. Most of the park falls within the floodplain, and there is no practicable alternative given the need for adequate visitor and management facilities to provide visitor opportunities and protect park resources. The potential for

loss of life or property damage will be minimized, if not altogether avoided, through early storm warnings and evacuation of people from the park and through appropriate building design. There will be no effect on the natural and beneficial values of floodplains and wetlands (water quality maintenance, groundwater recharge, natural moderation of floods, biological productivity).

Recommended:

Acting Regional Director Southeast Region AUG 3 0 1982

Date

Approved:

ACTING ational Park Service

Date

APPENDIX C: PUBLIC COMMENTS AND NATIONAL PARK SERVICE RESPONSES

INTRODUCTION

A notice of availability of the <u>Draft General Management Plan/Wilderness Study/Development Concept Plan</u> (May 1980) and the <u>Draft Environmental Impact Statement</u> (May 1980) was printed in the <u>Federal Register</u> (vol. 45, August 1, 1980), and in several North Carolina newspapers. The notice contained an announcement of public hearings to be held at four locations in North Carolina: Greensboro, September 8; Raleigh, September 9; Greenville, September 10; and Harkers Island, September 11. The public was also invited to submit written comments, which were accepted until October 13.

Nearly 1,500 copies of each document were distributed by mail to individuals who expressed interest, to private organizations, and to public officials and agencies. The four public hearings were attended by 595 people, of whom 72 commented orally on the plan. Additionally, 517 letters (including 8 petitions, one of which had 14,252 signatures) were received.

NPS is grateful to all who have responded to its invitation to comment on the <u>Draft General Management Plan</u> and <u>Draft Environmental Impact Statement</u>. All of the comments were considered in generating the plan as now written to provide for visitor use and protect resources at Cape Lookout National Seashore. The following are comments received concerning the accuracy of or factual basis for conclusions drawn in the draft plan and environmental statement, along with National Park Service responses.



DEPARTMENT OF THE ARMY WILMINGTON DISTRICT, CORPS OF ENGINEERS P. O. BOX 1890 WILMINGTON, NORTH CAROLINA 28402

IN REPLY REFER TO

SAWEN-EA

10 October 1980

Superintendent Cape Lookout National Seashore PO Box 690 Beaufort, NC 28516

Dear Sir:

I have reviewed the Draft General Management Plan/Wilderness Study/Development Concept Plan and Draft Environmental Impact Statement for Cape Lookout National Seashore in Carteret County, N.C. and have the following comments to offer.

The Corps of Engineers has authorized navigation channels through all of the inlets mentioned in your study area. Of these, it appears that only the projects at Bardens Inlet and New Drum Inlet would be affected by your proposal.

It appears from the map of your proposal that all of the islands behind Bardens Inlet are proposed as wilderness areas. Several of these islands are not naturally occurring but rather are dredged material disposal areas created through the routine maintenance of the navigation channel leading from Back Sound through the inlets. The continued use of these islands as disposal areas is considered critical for the maintenance of the project. Therefore, it is suggested that the proposed wilderness designation be dropped for these islands. We are currently preparing a map that designates which islands were created with dredged material and are currently being used as disposal areas. We will forward this map to you within the next few weeks.

The New Drum Inlet project is not currently being maintained. However, the project is still authorized and could be actively maintained in the future should the inlet close as foreseen on page 19 of the environmental statement. That would not change the authorization for the project, and it could one day become necessary to reopen the inlet again. Should such a need arise, coordination between our agencies would, of necessity, work toward an acceptable solution. It is felt, however, that it would be prudent if statements were made in both the management plan and environmental statement addressing the possibility of this prospect.

RESPONSES

1 A wilderness recommendation will be analyzed in a separate effort, and deletion of dredge spoil islands from wilderness consideration will be evaluated at that time.

2 Reference to the New Drum Inlet project has been inserted in both documents. (See "Special Use Zone" in the GMP and the "Private Rights, Interagency Agreements, Permits" heading in the FEIS).

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SAWEN-EA

10 October 1980

Superintendent, Cape Lookout National Seashore

As indicated in the documents, permits from the Corps of Engineers will be necessary for some of the actions proposed. Site specific information will be required on pier locations, channel alignments and disposal areas before these permit actions can be properly evaluated. In general, dredging activities for all of the alternatives discussed would require Department of the Army Section 10 permits under the River and Harbor Act of 1899 and Section 404 permits under the Clean Water Act. This would include dredging by "Kicking Out." This method is generally not approved unless it is the only feasible method, and it would not cause significant impacts to the surrounding squatic environment. The draft EIS does not contain sufficient information from which this can be evaluated.

In summary, I am concerned that authorized Federal navigation projects should be excluded from any wilderness area designation and I would object most strenuously to their inclusion. If you do not agree, I would appreciate your contacting me prior to making the EIS final.

I appreciate the opportunity to review these documents and hope that you will not hesitate to contact me if I can be of further service.

Sincerely,

POBERT V HICHES

Colonel, Corps of Engineers

District Engineer

RESPONSES

3 We will apply for the permits when the projects have been designed. The plan has been revised to an 8-10 year time frame. In that period we expect that the present ferryboat access routes will continue to be used following "natural" channels. As for the practice of "kicking-out", it began more than 30 years ago and has continued ever since without apparent significant impacts to the surrounding environment.

1



DEPARTMENT OF THE ARMY
WILMINGTON DISTRICT CORPS OF ENGINEERS
P. O. BOX 1890
WILMINGTON. NORTH CAROLINA 28402

IN REPLY REFER TO

SAWEN-EA

25 June 1981

Superintendent Cape Lookout National Seashore PO Box 690 Beaufort, NC 28516

Dear Sir:

Inclosed is a map showing the locations of the dredged material disposal areas which are currently used in the maintenance dredging of the channel from Back Sound to Lookout Bight. This map is provided to supplement our letter of 10 October 1980 which furnished our comments on the Draft General Management Plan/Wilderness Study/Development Concept Plan and Draft Impact Statement for Cape Lookout National Seashore in Carteret County, N.C. At this time I would like to reiterate our request that these disposal areas not be included in the proposed wilderness area as these are currently the only disposal areas available to the Corps for channel maintenance and are, therefore, critical to navigation in the area.

If you have questions regarding the Corps' use of these islands, please feel free to contact Mr. Barry Holliday of the District's Navigation Section at (919) 343-4823 (FTS 671-4823), or contact me directly.

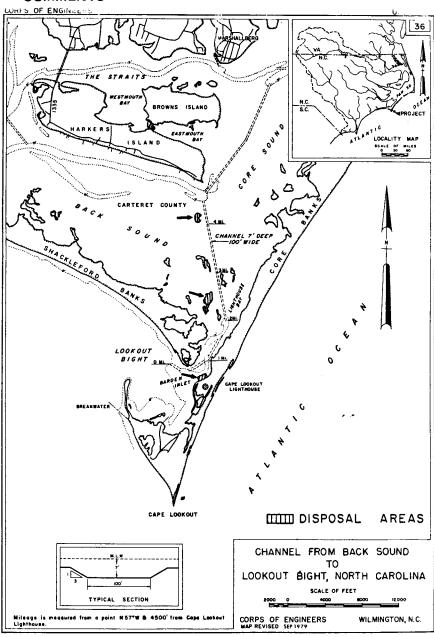
Sincerely,

l Incl As stated A. A. KOPCSAK LTC, Corps of Engineers Acting Commander and District Engineer

CF:
Mr. Drew Chick
Denver Service Center, TSE
National Park Service
755 Parfet Street
PO Box 25287
Denver, CO 80225

RESPONSES

4 Please refer to comment and response 1 to the DOA letter dated 10 October 1980 on a preceding page.



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COMMENTS



DEPARTMENT OF THE ARMY
WILMINGTON DISTRICT, CORPS OF ENGINEERS
P. O. BOX 1890
WILMINGTON, NORTH CAROLINA 28402

IN REPLY REFER TO

20 July 1981

Mr. Preston D. Riddle Cape Lookout.National Seashore PO Box 690 Beaufort, NC 28516

Dear Mr. Riddle:

Inclosed is a revised map showing the location of the dredged material 5 disposal areas which are currently used in the maintenance dredging of the channel from Back Sound to Lookout Bight. As Mr. Baden of our Environmental Resources Branch discussed with you over the telephone on 15 July 1981, the map that accompanied our 25 June 1981 letter was in error.

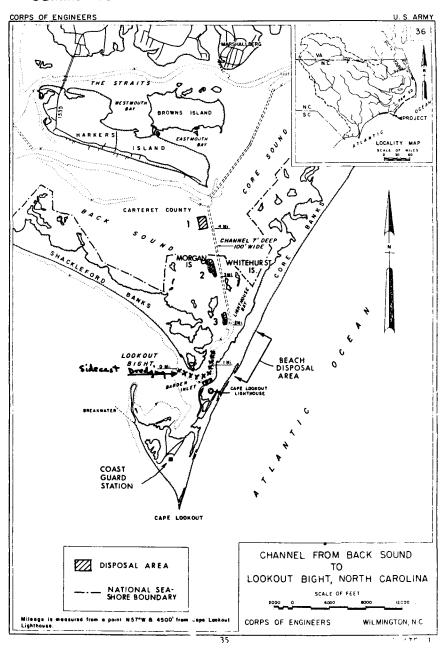
Sincerely,

l Incl As stated E. G. LONG, JR. Chief, Engineering Division

CF: Mr. Drew Chick Denver Service Center, TES National Park Service 755 Parfet Street PO Box 25287 Denver, CO 80225

RESPONSES

5 Please refer to comment and response 1 relative to the DOA letter dated 10 October 1980 on a preceding page.



0CT 7 10

Mr. Neal G. Guse Acting Regional Director Southeast Region, National Park Service U.S. Department of the Interior 75 Spring Street, S.W. Atlanta, Georgia 30303

Dear Mr. Guse:

This is reference to your draft environmental impact statement entitled "Proposed General Management Plan, Development Concept Plan and Wilderness Study for Cape Lookout National Seashore, North Carolina." The enclosed comment from the National Oceanic and Atmospheric Administration is forwarded for your consideration.

Thank you for giving us an opportunity to provide this comment, which we hope will be of assistance to you. We would appreciate receiving six copies of the final statement.

Sincerely,

William & Sullians

Robert T. Miki Deputy Assistant Secretary for Regulatory Policy (Acting)

Enclosure: Memo from D.R. Ekberg
National Marine Fisheries Service
National Oceanic and Atmospheric
Administration

RESPONSES

6 We will be happy to provide you with six copies of the FEIS.

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UNITED STATES DEPARTMENT OF COMMERCE National Oceanic and Atmospheric Administration NATIONAL MARINE FISHERIES SERVICE

Duval Building 9450 Koger Boulevard St. Petersburg, FL 33702

Recid oples SEP 25 1980

September 19, 1980 F/SER61/RSS 893-3503

TO:

PP/EC - Joyce M. Wood

FROM:

F/SER6 - D. R. Ekberg

SUBJECT

Comments on Cape Lookout National Seashore--Carteret County, NC (DEIS #8008.04)

The Draft Environmental Impact Statement that accompanied your memorandum of August 11, 1980, has been received by the National Marine Fisheries Service for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

General Comments

Resources for which the National Marine Fisheries Service (NMFS) is responsible have been addressed to our satisfaction in the Draft Environmental Impact Statement (DEIS). However, we note that Alternatives 1, 3 and 4 require dredging to establish permanent access channels to the proposed public access points.

According to the DEIS, details of this work will be addressed in a future Transportation Study. In our opinion, this study should have been included in the DEIS. Accordingly, we recommend that the Final Environmental Impact Statement (FEIS) include this study and provide specific information regarding the scope of work requiring Section 10/404 permits (i.e., channel alignments, channel dimensions, docking site designs and the location and dimensions of spoil disposal sites).

Also, the shoreline erosion in Cape Lookout lighthouse area is not adequately addressed in the DEIS. It states on page 45, paragraph 3, line 7, that "The eastern shore of Bardens Inlet has been migrating eastward at a rapid rate threatening the destruction of Cape Lookout lighthouse..." However, it does not adequately address the consequences of allowing this erosion to continue. If the erosion is unchecked, a new inlet could be opened. This could impact fishery resources by altering circulation patterns in this sensitive estuarine area. Furthermore, use of the inlet by a substantial commercial and recreational boating fleet would be threatened. The



10TH ANNIVERSARY 1970-1980

National Oceanic and Atmospheric Administration

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RESPONSES

- 7 The NPS has adopted a revised alternative which calls only for maintenance dredging of existing channels as needed. Before doing any dredging the NPS will apply for Section 10/404 permits.
- 8 Any discussion of shoreline erosion of Barden Inlet must be placed in historical perspective. This inlet opened during a storm in 1933. It is the nature of inlets to widen, migrate, or close as part of the natural coastal process. By congressional mandate, the Corps of Engineers is dredging the inlet to maintain a shipping channel in deference to the "substantial commercial and recreational boating fleet" that has taken advantage of this breach in the barrier island chain. The Corps pointed out in its "Erosion Study: Cape Lookout Lighthouse" (1978), prepared at the NPS' request, that the eastern shoreline of the inlet at the lighthouse had been eroding at an average rate of 2.6 feet per month over the past 37½ years and that continued eastward erosion of the inlet is inevitable. However, the rate slowed to one meter for the calendar year preceding July 1981. The Corps had moved its channel westward and had dumped the dredge spoil material in the near shore area just west of the light station.

The threat to the lighthouse area has lessened recently. If erosion should again pose imminent danger to the lighthouse complex, NPS will consult with the U.S. Coast Guard on possible solutions to save the complex. The information supplied by the U.S. Army Corps of Engineers will be used as background and support material in reaching any decision concerning ultimate management of the lighthouse complex.

2

U.S. Army Corps of Engineers recently conducted a study at the National Park Service (NPS) request, that suggested four alternatives for dealing with this problem. The FEIS should address this study and discuss how the NPS plans to deal with this erosion problem.

The NMFS supports the selection of Alternative 1 as the NPS proposal, since it offers opportunities to use the fishery resources which are an integral part of the National Seashore, while conserving and protecting valuable fishery habitat.

CLEARANCE:

SIGNATURE AND DATE

F/HP: J. Rote Tates M. Barber for J. Rote

9/23/80

cc: F/HP(3) GOMFMC F/SER611

Paul Hemmann, Sec. Rep, ATLA



United States Department of the Interior

GEOLOGICAL SURVEY **RESTON, VA. 22092**

DES-80/44

0CT 3 1980

Memorandum

To:

Regional Director, National Park Service

Through: Assistant Secretary--Energy and Minerals θ

From:

Director, Geological Survey

Subject: Review of draft environmental statement for general management plan, development concept plan, and wilderness study

for Cape Lookout National Seashore, North Carolina

We have reviewed the draft statement as requested in your letter of July 30.

We find that more information should be provided on ground-water resources and their use so as to ensure that water of good quality is provided for the public and that adverse impacts are avoided in the treatment and disposal of sewage.

These concerns are discussed in the enclosure.

for H. William Menard

Enclosure

One Hundred Years of Earth Science in the Public Service

The statement should estimate the project water demand and assess the corresponding impacts on the HIWEMC wells and on the aquifers, if ground water will be used. The location of the source of the water should be given. Further, it should be clarified whether all water to be used by NPS is to be obtained from the HIWEMC or whether, as stated in the plan (e.g., p. 60, 84, 85, 90), NPS will also operate its own wells in distant portions of the seashore. If the latter is true, impacts on aquifers should be assessed.

The draft general management plan states that spray irrigation for disposal of sewage effluent from an activitated sludge facility is under consideration, if NPS must process its own sewage (p. 28). Either a preliminary assessment of the ground-water impacts of this alternative or a plan to issue a subsequent supplement to the draft statement if this expedient is implemented, should be included in the present statement. Because of the relatively high permeability of much of the surficial material of the National Seashore, such an assessment of potential impacts would be significant.

In the discussion of the wilderness alternative, the environmental statement should indicate precautions to be taken to ensure the continuing good quality of drinking water for the public, such as well location and construction practices, water-level monitoring, periodic analysis, treatment practices, and delegation of responsibility to other agencies.

RESPONSES

9 Project water demand at the Harkers Island administrative site is too conjectural at this time to be meaningful. We have been assured by both the manager of the Harkers Island Water and Sewer Corporation (HIWSC) and the North Carolina district hydrologist that the source of supply is ample to meet our potential needs and those of the village. The HIWSC has four multiscreen, gravel-packed wells varying from 85-169 feet in depth which tap the York formation. Between 25 and 60 feet beneath the surface is a good aquiclude of a silty sandy clay.

The NPS will operate its own water systems on the barrier islands at Cape Lookout Point, Shingle Point, North New Drum Inlet, and at Portsmouth Village, but groundwater availability is vastly different at each location, as is its quality. Potable water will be available at various designated points on the barrier islands of the park.

At Cape Point, three wells have been drilled to depths of 477, 412, and 435 feet, respectively, each of which has been tested at 180 gallons per minute. This quantity of freshwater is more than adequate, with storage, for our needs. These wells are 3, 2, and 8 inches in diameter, respectively; are cased to 300, 255, and 337 feet, respectively; and draw freshwater from the Oligocene limestone at the upper part of the Castle Hayne formation. When one well was dug, saltwater was detected at a depth of 90-100 feet. We would probably use a ground level pneumatic tank for storage.

Groundwater sources at historic Portsmouth Village have not been fully explored. The freshwater lens in the unconfined aquifer probably occurs from less than 10 to a maximum of 50 feet below the surface. This water may have to be treated to remove taste and color, and aerated. Water at depths of 400 feet in the Oligocene limestone is thought to be highly brackish, hard, colored, and with a slight aroma. We expect to dig test wells in cooperation with federal and state hydrologists.

It is most unlikely that our usage of water at any of the places named would be noticeable in any of the adjoining developed water systems.

- 1 O Spray irrigation would not contaminate the groundwater at either Harkers Island or Cape Point. We come to this conclusion based on the data in response 9. If water from the unconfined aquifer at Portsmouth Village is used, we would be guided accordingly with a properly designed sewage disposal system meeting federal and state standards.
- 1 1 We have decided not to provide drinking water at ferryboat landings on Shackleford Banks. There, visitors will be expected to carry in their own water supply. Our regional office in Atlanta has a full-time Public Health Service consultant to advise on and monitor matters relating to water supply and sanitation. Groundwater samples are taken and analyzed on a regular basis so that corrective measures can be taken if contamination occurs. Regardless of where water is available to the visiting public, the necessary public health considerations will apply.

123

COMMENTS



DES 80-44

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE SOUTHEAST REGIONAL OFFICE 75 Spring Street S.W., Suite 1176 Atlanta, Georgia 30303

Mr. Preston D. Riddle Superintendent Cape Lookout National Seashore P.O. Box 690

Beaufort, North Carolina 28516

SEP 1 5 1980

Dear Mr. Riddle:

We have reviewed the draft Environmental Impact Statement (EIS), General Management Plan (GMP), Wilderness Study, and Development Concept Plan for Cape Lookout National Seashore, North Carolina. We find the documents to be generally adequate in addressing the cultural and recreational resources within our program interests.

- 1 2 These documents mention the acquisition of more land within the boundary of the National Seashore but do not provide any indepth discussion pertaining to where these tracts are located or what means will be utilized to acquire them. We suggest that a more extensive discussion of further land acquisitions be included with attention to alternate-to-fee approaches, e.g., donations, easements and exchanges.
- 13 Recreational opportunities and visitor use are primary factors in evaluating the environmental impact and the management of the National Seashore and coordination has been effectuated with various agencies. However, these documents do not reflect any coordination with the Division of Parks and Recreation, North Carolina Department of Natural Resources and Community Development, pertaining to the Statewide Comprehensive Outdoor Recreation Plan. We suggest that this State agency be consulted as they may relate to the EIS and GMP.

Thank you for the opportunity to review these documents.

Sincerely yours,

Robert M. Baker Regional Director

cc: Regional Director Southeast Region National Park Service

> Mr. Howard N. Lee State Liaison Officer Raleigh, North Carolina

- 1 2 The tracts remaining to be acquired within the authorized national seashore boundary are located on Shackleford Banks and in the vicinity of the lighthouse. The legislation called for acquisition of Shackleford Banks by the United States. Both the enabling and amended legislation for the national seashore authorize the secretary of the interior "to acquire lands by donation, purchase with donated or appropriated funds, or exchange." On Core Banks/Portsmouth Island, the state granted an easement between mean high and mean low water on the ocean side and shore lands and submerged lands between mean high water and 150 feet beyond mean low water on the sound side.
- 13During the planning process, we examined the State Comprehensive Outdoor Recreation Plan and found our proposals to be consistent. Copies of the draft GMP and EIS were reviewed by the Division of Parks and Recreation through the A-95 Clearinghouse.

IN REPLY REFER TO



United States Department of the Interior

1792 (930)

BUREAU OF LAND MANAGEMENT

EASTERN STATES OFFICE 350 South Pickett Street Alexandria, Virginia 22304

AUG 1 5 1980

Memorandum

To:

Regional Director, National Park Service, Atlanta Georgia

From:

Eastern States Director

Subject:

Draft Environmental Statement on the Proposed General Management Plan, Development Concept Plan, and Wilderness Study for Cape Lookout National Seashore, North Carolina

(DES-80/44)

We have reviewed the subject draft plan and conclude that the document presents a detailed and comprehensive assessment of the proposed action. Moreover, the assessment presents a good description of the existing environment. We also find that the probable environmental impacts and unavoidable effects of the alternatives are satisfactorily addressed.

Due to our lack of special expertise relative to the development concept plan on the unique environment involved, we are unable to provide substantive comments on these plans. Thank you for the opportunity to review and comment on the document.

Roger L. Hildebiedel

RESPONSES

14 No response necessary.

United States Department of the Interior

BUREAU OF MINES 2401 E STREET, NW. WASHINGTON, D.C. 20241

October 8, 1980

DES 80-44

Memorandum

To:

Regional Director, Southeast Region, National Park Service,

Atlanta, Georgia

From:

Director, Bureau of Mines

Subject: Draft environmental statement on the proposed General Management Plan, Wilderness Study, and Development Concept Plan for Cape

Lookout National Seashore, North Carolina

Thank you for the opportunity to review these drafts.

We believe that the proposed plans would not have a significant impact on the mineral resource potential of the area. However, neither the draft environmental statement (DES) nor the general management plan (GMP) includes a discussion of mineral resources. For completeness, we recommend that a subsection entitled "Mineral Resources" be included in the DES, Part III, C-1b, Physical Characteristics, and in the GMP, 15 Part III, A, Natural Conditions and Values. The only apparent potential mineral resource of the immediate area of Cape Lookout is silica sand. Studies by the North Carolina Department of Conservation and Mineral Resources indicate that silica sands in the area are too high in contaminants and too far removed from inland markets to be of value for glassmaking or other specialized uses. In addition, the relative inaccessibility of the sands make them of negligible value for construction purposes. Comments to this effect could be incorporated in the "Mineral Resource" subsections.

CB Kendler

Director

RESPONSES

15 We appreciate the information you provided on mineral resources and have incorporated it in the two documents, as you suggested.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30308

October 2, 1980

4SA-EIS

Mr. Neal G. Guse Acting Regional Director National Park Service Southeast Regional Office 75 Spring Street, S. W. Atlanta, Georgia 30303

Dear Mr. Guse:

We have reviewed the Draft Environmental Impact Statement for the Concept Plan, Cape Lookout National Seashore (Carteret County), North Carolina, and were favorably impressed by the balanced treatment given to the proposal's impacts.

There were, however, two areas on which we offer comment:

- 1. The interpretative trail proposed for the Harpers Island Visitors Center should be an elevated boardwalk that goes over the saltmarsh rather than a filled and paved trail. While this trail is to be utilized by handicapped individuals, we think that a wood structure can be designed to accommodate their needs as easily as a paved one.
- 2. The disposal of dredged material from the proposed ferry channels needs 17 to be further evaluated. The Final EIS should prioritize disposal areas with beach nourishment as a primary option and new spoil islands in the Sound as the last. If spoil islands are unavoidable, there should be some plan to revegetate and stabilize them against erosion.

On the basis of our review a rating of LO-2 was assigned, i.e., we foresee no long term environmental objections to this proposal, but some additional information is requested.

If you wish to discuss this matter in greater detail, Dr. Gerald Miller, EIS Review staff (FTS 257-4758), will serve as point of contact.

Sincerely your#

ohn E. Hagan III Chief, EIS Branch

- 16 It was our intent to build a boardwalk over the marsh. Thank you for calling this oversight to our attention.
- 17 Decisions on disposal areas for dredge spoil materials cannot be made until after the GMP is approved and comprehensive design has been completed. The review process including a consistency determination required before the Corps of Engineers issues Section 10/404 permits will assure that all options are considered for disposal areas. Requisite minimal maintenance dredging, now planned, will not generate the large volumes of spoil that could require new spoil islands (compare Alternative 1: the Plan with Alternative 3).

STATE OF NORTH CAROLINA OFFICE OF THE GOVERNOR RALEIGH 27611

JAMES B. HUNT, JR.

November 12, 1980

Dear Mr. Springer:

The State of North Carolina has completed its review of the draft environmental impact statement for the General Management Plan for Cape Lookout. Because of the significance of this area to both tourism and commercial fishing in North Carolina, the plan has been studied very carefully and we appreciate the opportunity for comment.

18 I am enclosing comments made by the Department of Natural Resources and Community Development and the Office of Marine Affairs on the Management Plan. We would appreciate your consideration in seeing that these comments are addressed in the final statement and will be glad to work with your office in determining the future of this important area.

My warmest personal regards.

Sincerely

Mr. William Springer National Park Service Southeastern Regional Office 75 Spring Street Atlanta, Georgia 30303 **RESPONSES**

18 Please refer to responses 19 through 35.



OFFICE OF

Anne Taylor

TO

: Chrys Baggett

SUBJECT: E-81-5026, Draft EIS Cape Lockout National Seashore

DATE

: October 7, 1980

The Department of Natural Resources and Community Development has reviewed the subject document and recommends it for futher development if the attached specific and major changes are incorporated.

Four recent National Park Service hearings on the document have added to the public opinion and evidence that must be considered in the formulation of the final Environmental Impact Statement. The department feels that the weight of this information will require a reordering of the precepts upon which the general management plan is founded. Further, the department finds none of the alternatives acceptable exactly as presented, but could support the proposed alternative when modified to reflect the following.

19 Wilderness. The wilderness designation has been the major point of controversy surrounding the general management plan, since it directly and indirectly affects all other issues. The department agrees that the natural character of these islands is sufficient to qualify them for consideration for wilderness designation. Disagreement arises on the extent of proposed wilderness designation and acceptance of its negative effect on existing recreational uses of the seashore.

Within the Department of Natural Resources and Community Development the concensus opinion is that only Shackleford should be recommended to Congress for wilderness designation. There is strong opposition to further use of wilderness designation. This is a significant change from the state's 1978 position which did not recommend wilderness designation for any of the area. The positions which follow on other issues related to wilderness designation will show why more extensive designation has not been found acceptable.

RESPONSES

28

¹⁹ Wilderness will be the subject of a separate analysis. Your comments will be considered and incorporated as appropriate in that wilderness analysis.

It must be noted that during the review process the Division of Parks and Recreation presented a persuasive minority opinion for wilderness designation. They supported designating more area than the department favored but agreed to less than the National Park Service proposal.

There are several items related to wilderness designation which were not adequately addressed in the Draft Environmental Impact Statement. The following items should be discussed further.

- . The impact of wilderness designation on future use of the seashore for other federal activities was not addressed. Particular emphasis should be placed on the disposal of dredge spoil material which is suitable for beach nourishment. There are several federally maintained navigation projects within the vicinity of Cape Lookout, and as the spoil disposal areas for these projects become more limited, it may be necessary to pursue beach disposal as an alternative. It should be clear in the final Environmental Impact Statement whether or not wilderness and natural area designation will preclude this use. This discussion should also address spoil disposal in the near-shore
- This discussion should also address spoil disposal in the near-shore beach area such as that which is presently being conducted when Barden's Inlet is maintained with a hopper dredge.
- . The justification for wilderness designation should be expanded on the subjects of geographic and users demand and their relationship to existing and future use projections.

On Island Transportation. There is total agreement within Natural Resources and Community Development that controlled use of private vehicles should be allowed in those areas designated as "natural" for administrative purposes. The vehicles are an indispensible part of sport and commercial fishing, to the extent that these activities cannot be adjusted to new modes of on island transportation. The curtailment of private vehicle use would mark am immediate seventy-five (75) percent reduction in sport fishing and thirty (30) percent reduction in the present use of the seashore, and a one-hundred (100) percent reduction in commercial fishing. This represents between 11,000 and 15,000 visitors, and an effect considered unacceptable by this department.

Within natural areas private vehicles should be allowed along a designated corridor parallel to the beach. The corridor would skirt sensitive wildlife habitat such as loggerhead turtle and shorebird nesting areas. Further, private vehicle regulations should establish a maximum number of permits to be available at one time, a maximum duration of permit not to exceed one month, seasonal restrictions allowing vehicle use from October 15 — April 15 or as necessary to protect native species, and the effect of the regulations should be reviewed annually.

Vehicular damage to the islands is a result of many years of uncontrolled use and the massive recent efforts to remove abandoned vehicles. With the introduction of controls, the department feels that the islands will begin to recover from previous damage and maintain an acceptable level of stability and habitat for animals.

The discussion of impacts of transportation is incomplete and the following items should be addressed further in the final Environmental Impact Statement.

20

- . The effects of public transpotation on nesting sea birds and loggerhead turtles were not discussed. These effects cannot be assumed to be beneficial and any detrimental conditions created by public transportation and National Park Service vehicles should be reported.
- . The amount of damage expected as a result of the controlled use of private vehicles and its relationship to the National Park Service's decision on their continued use.

<u>Dredging and Disposal of Bottom Sediments.</u> The Department of Natural Resources and Community Development is opposed to the dredging of access channels to the seashore as proposed in the general management plan. The continued use of natural channels and shallow draft ferries, with their inherrent limitations on the use of the seashore seems to be entirely acceptable.

consideration for

The location and design of individual dredging projects will receive rinal state approval through the consistency process pursuant to the Coastal Area Management Act. At that time Office of Coastal Management will determine if the impacts of such proposals are sufficiently in the public interest to warrant approval.

The Draft Environmental Impact Statement does not adequately address the following considerations related to dredging , and they should receive additional discussion.

21

- . Methods of spoil disposal, impacts on productive shellfish areas, impacts on submerged grass beds, and the frequent maintenance requirements for those channels running across Core Sound and Ocracoke Inlet must be given more detailed explanations.
- Why the proposal to dredge, deepen and widen access channels is not inconsistent with the National Park Service's wilderness and minimum development proposals, and the policy of allowing nature to take its course on the seashore.
- . It should be made clear why the existing deep water access near Cape Lookout cannot be continued without the necessity of developing a different site with its associated dredging.

RESPONSES

2 O Public transportation in the plan as now written is presently limited to 3 miles between the dock at the Cape Lookout lighthouse and Cape Point, but when warranted, this could be extended in the direction of New Drum Inlet. We expect to mitigate adverse effects on loggerhead turtles and nesting sea birds by limiting all vehicles to a corridor that will shift to avoid nesting sites.

Again, we expect that confining vehicles to a designated corridor will mitigate much of the damage that has occurred in the past. Nonetheless, we will continue research and monitoring, which may show that more stringent measures will be required. If so, all or portions of the seashore could be closed to vehicles for extended periods, as suggested in the last paragraph on page 2 of your comments.

21 Resulting from the public involvement process, we have scaled down our dredging requirements so the questions you raised in your first summary paragraph under "dredging and disposal of bottom sediments" should no longer be at issue. For the foreseeable future we see a need for minimal maintenance dredging as described heretofore under alternative 1 (the plan). When each of these projects is designed and before Section 10/404 permits are issued by the Corps of Engineers, the state will be given the opportunity to review a consistency determination and the public will be given an opportunity to comment.

At similar marine units of the National Park System, regularly scheduled ferryboat service on a frequent schedule has soon reached capacity with reservations required. We anticipate a similar result at Cape Lookout Point. To serve the public adequately, it then could become necessary to operate larger vessels with a deeper draft.

The existing deep-water access near the Cape Lookout lighthouse is on a shoaling shoreline, thus making it prudent to locate the public ferryboat dock to a "more stable" section of shoreline north of the lighthouse to avoid the cost and environmental effects of extensive dredging.

Disturbance of Submarine and Marsh Vegetation. This activity is similar to access channel dredging in the National Park Service approach to discussing it and the department's position on its prospect. The statements in this section are to the effect that ten acres of marsh habitat lost through development are small relative to the remaining areas of the seashore which will not be disturbed. This is a common argument, even in the private sector, when marsh alteration projects are proposed through the state permit process. It is also one that is generally not accepted since these proposals can usually be changed by pursuing alternatives with less impact.

2 2 Again, final approval of disturbance for access point development will come with the state's consistency determination through Office of Coastal Management. For the purpose of the final Environmental Impact Statement the following effects of marsh disturbance need more explanation:

Anticipated impacts on primary productivity, wildlife habitat, water quality maintenance, and aesthetic value.

Access. The general management plan recommends closing the access point at North New Drum Inlet. Regardless of the final designation (wilderness or natural area) of the area from Drum Inlet to Ocracoke Inlet, the Department of Natural Resources and Community Development feels that this access point must be included in the final management plan. Without this access point the user would be required to drive the additional thrity-seven (37) miles from the National Park Service visitor center to Cedan Island, pay for a

2 3 from the National Park Service visitor center to Cedah Island, pay for a 2% hour ferry ride to Ocracoke, take: yet another ferry ride to Portsmouth Village, and still be twenty (20) miles from Drum Inlet. Few people will choose the inconvenience of this circuitous route and the result will be a concentration of use in the already higher percentage use areas of Schackleford and Lookout Point. For the purpose of uses distribution convenience, and emergency access, the North New Drum Inlet access point should remain open.

Commerical Fishing. The Draft Environment Impact Statement minimizes the importance of beach hauling as a commercial fishing activity. A perspective with which the department disagrees. It must be recognized that fishermen follow long-term trends; fishing the sounds when they are most productive and fishing the ocean when it is. The final Environmental Impact Statement should provide more depth on this issue and address the following:

The social and economic impact of the loss of this area to seine-haul fishermen either through wilderness designation on prohibition of vehicles.

RESPONSES

- 2 2 For reasons previously stated, more specific data cannot be provided now. Suffice it so say that the marsh would not be dredged; rather the ferryboat docks would be connected by a boardwalk to "fast land." Your suggested discussions have been incorporated in the FEIS as appropriate.
- 23 The plan now includes retaining ferryboat access to North New Drum Inlet.

24 Under the plan as now written, commercial fishing by beach hauling may continue as in the past (the dory may be carried in a vehicle or towed on a trailer behind a vehicle).

Control of Exotic Species. The National Park Service should not act to remove any species from the seashore until a detailed management plan for wildlife has been developed and approved. Neither the Wilderness Act of 1964 nor current National Park Service policy requires the removal of bank ponies or ringneck pheasants from the seashore. Further, the department questions whether the banks ponies should be considered exotic since there are accounts of their presents before permanant settlement of the area. The department does not disagree with the removal of other grazing stock, but the recreational benefits of these two species outweighs any damage controlled populations might cause.

Cape Lookout Lighthouse. The recreational value of the lighthouse is easily documented and its protection is desirable to the department. Department of Natural Resources and Community Development supports the recommendation of the Department of Cultural Resources. A related matter is of specific authority and concern of this department and should receive discussion in the final Environmental Impact Statement:

- 26 What is the inter-relationship between the lighthouse and erosion from Bardens Inlet, and what are the long-term effects of alternative maintenance decisions on each issue.
- 27 Boardwalk on Shackleford Banks. The Department of Natural Resources and Community Development submits that the proposed boardwalk should be eliminated from the proposal as being incompatible with wilderness designation.

Recovery and Maintenance of Natural Plant Cover. The National Park Service's 1963 feasibility study on establishment of the national seashore noted a need for increased stabilization of the islands through management. The department agrees with this finding and recommends a more active effort than that proposed by the National Park Service. It is felt that appropriate parts of those lands designated as natural areas should have vegetation established through a management program. After that time nature could take its course, but the first step should be encouraged through the reintroduction of native species. The department's Division of Forest Resources is prepared to work with the National Park Service on this matter.

In conclusion the Department of Natural Resources and Community Development finds that the modifications to the National Park Service's proposed alternative presented herein constitutes an improvement to the general management plan. Further, it is felt that these more nearly meet the needs of the existing and future users while satisfying the "Purpose and Need for Action" as set out in the Draft Environment Impact Statement.

RESPONSES

- A representative number of horses will remain on Shackleford Banks assuming that not all will be removed by their owners after the land is purchased. The status of the ring-necked pheasant and its impact on park resources will be studied before any action is taken towards control or removal of this exotic species.
- 26 Barden Inlet eroded eastward at an average rate of 9.7 meters per year between 1940 and 1977 (see Table 1 of "Erosion Study: Cape Lookout Lighthouse," Corps of Engineers, 1978). This slowed to one meter in the calendar year ending July 1981. The Corps stated that "the easterly trend of inlet channel migration and attendant erosion along the Core Banks side of Barden Inlet is inevitable" (page 91). Other threats stem from weather patterns and associated wind fields which engineering works cannot control. The Corps suggested three alternatives to slow erosion of the shoreline: (A) placement of a stone riprap revetment along the eroding bank of the inlet channel; (B) installation of training dikes protruding from the eroding shoreline into the channel; and (C) repetitively relocating the inlet channel by dredging to be accompanied by filling of the area previously eroded by the inlet migration process. Although plan A was the solution recommended by the Corps, its total cost was estimated at over \$5.5 million; plan B was estimated at nearly \$3.5 million; plan C at almost \$3 million. Annual maintenance costs were estimated at \$414,000; \$274,000; and \$428,000 for each of the three alternatives, respectively. All of these were temporary solutions to halt or slow the rate of erosion. Each is cost prohibitive under the present and projected funding levels for the NPS. A major storm in the area is long overdue and that could alter the situation dramatically. Nevertheless, the Corps will continue to deposit spoil material offshore (west) of the lighthouse from its normal maintenance dredging of the channel from Back Sound to Lookout Bight. In our view, the Corps' actions have been responsible for decreasing the erosion rate in recent months.
- 27 We have eliminated the boardwalk on Shackleford Banks. It was a device to protect the dunes from erosion when visitor use levels required it.
- Prom the time of early settlement, domestic livestock had grazed on Core Banks/Portsmouth Island causing much of the area to be denuded of vegetative cover. Since 1958, when the livestock were removed, the vegetation has recovered. Still further recovery will take place in the future when vehicles are confined to an established corridor. For the most part, the vegetation today is typical of a barrier island environment.

True, there are still some barren areas such as unvegetated sand flats, but they are as much a part of the seashore as are grasslands and shrub thickets, and they attract their own populations of sea birds to nest, rest, and feed. In time, through normal plant succession, the sand flat could become a grassland.

It is possible that some species have disappeared over the years. Their reintroduction would be desirable when suitable habitats have developed to ensure their survival. Before a planting (management) program could be undertaken, it must be shown that such species were truly native to Core Banks/Portsmouth Island.

James B. Hunt, Jr., Governor Joseph W. Grimsley, Secretary

October 7, 1980

Office of Marine Affairs (919) 733-2290

MEMORANDUM TO:

A-95 Clearinghouse

FROM:

in the

SUBJECT:

Cape Lookout Management Plan Comments and Position

The U.S. National Park Services <u>Draft General Management Plan, Wilderness Study, Development Concept Plan for Cape Lookout</u> has been reviewed in the Office of Marine Affairs and the following comments are forwarded herein.

- 1, The Office of Marine Affairs and the North Carolina Marine Science Council oppose the recommended "Wilderness" designation of Portsmouth Island and Core Banks. Such a designation would all but eliminate any utilization from this outstanding traditional surf fishing area. Shackelford Banks is generally agreed to be ideal for the wilderness designation and OMA supports this proposal. Portsmouth Island and Core Banks should be designated as a natural area.
- 2. Vehicles should not be allowed on Shackelford Banks. Vehicles should be allowed on Core and Portsmouth Islands under controlled conditions, i.e. limited numbers, limited time period, certain times of the year, liability for removal of vehicles (to prevent abandonment) etc.
 - 3. There should be access to Portsmouth Island just north of Drum Inlet.
- 30 4. The proposed dredging of access channels is generally unacceptable. A transportation scheme utilizing existing routes and methods would be more consistent with management needs and objectives and environmental concerns.
- Traditional commercial fishing should be allowed.
- $32_{\,\rm contrary}^{\,\,}$ 6. We believe that the construction of a boardwalk on Shackelford Banks is to the wilderness concept and should not be undertaken.
- $\bf 7.$ Stabilization through reforestation with native species is an acceptable practice and should be allowed.
- 8. The lighthouse complex should be protected and we believe, can be protected, making use of dredged material produced during normal channel maintenance dredging.
- The wildlife question needs careful study before any species is arbitrarily removed from the seashore. It may be necessary to control numbers in some cases.

- 29 Agreed. The draft plan has been changed accordingly.
- 30 The intent of the present plan is to use existing routes and methods as long as possible. We anticipate the most popular island destination will be Cape Point. When the marina at the headquarters area on Harkers Island is built, a channel will be dredged connecting it to the shipping channel in Back Sound. Then the new ferryboat dock/boardwalk will be built on the Core Banks shoreline north of the lighthouse where there is deep water presently.
- 31 Same as response 24.
- 32 Same as response 27.
- There is no evidence that Core Banks/Portsmouth Island ever were forested. The maritime forests on Shackleford Banks and at Guthries Hammock grow where they do because of the natural environment. Where that environment develops in the future, the corresponding vegetation will establish itself. Developing such an environment artificially with species native to the islands is experimental at best and can produce long-term detrimental effects on native wildlife and interfere with normal coastal processes. Please refer also to response 28.
- 34 Same as response 26.
- 35 Same as response 25.

Sara W Hadgkins, Secretary James B. Hunt, Jr., Governor



October 10, 1980

Superintendent Cape Lookout National Seashore P. O. Box 690 Beaufort, N.C. 28516

Re: Draft EIS, Cape Lookout National Seashore Carteret County, CH 81-5026

Dear Sir:

We have received notification from the State Clearinghouse concerning the above project and would like to comment.

We support the reuse of the lighthouse complex as a visitor center. We would like to stress, however, the need for a sensitive rehabilitation of the buildings in the complex. Because this project is subject to Section 106 and to 36 CFR Part 800, we recommend that you submit to this office detailed plans for any alterations intended for the structures and other aspects of the project.

Enclosed is a copy of the Secretary of the Interior's Standards for Rehabilitation of Historic Structures. Members of our staff will be happy to offer technical assistance and advice regarding any rehabilitation work in the historic areas during our review.

We are also concerned over the possible impact of the boat dock on the Portsmouth Village Historic District. We request that you notify us as soon as the final location of the dock has been determined. In addition, as your project paper points out, this will lead to an increase in visitors which could possibly adversely affect the district. Provisions should be made for careful monitoring and periodic review by and consultation with this office and with the Advisory Council concerning the consequences of increased visitation in the area.

We look forward to working with your agency as you make your determination of effect and as the official Section 106 consultation process gets underway.

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 comments, please contact Ms. F. Langdon 22munds, Environmental Review Coordinator, at 919/733-4763.

John J. Little, Deputy State

Sincerely /

cc: Clearinghouse National Register of Eistoric Places
Advisory Council on Wistoric Preservation

RESPONSES

36 See appendix B.

J. PARKER CHESSON, JR. CHAIRMAN P. O. BOX 1752 ELIZABETH CITY, N. C. 27909

KENNETH D. STEWART EXECUTIVE SECRETARY P. O. BOX 27687 RALEIGH, N. C. 27611



Telephone 919-733-2293

October 24, 1980

CHARLES WELLS

VICE CHAIRMAN
WILMINGTON
METERS
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DEWITT L. DARDEN
MAYME W. DAVE
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JERRY W. HARDESTY
JERRY W. HARDESTY
M. MAYDOLOK
JAMES E. SYNES
JAMES E. SYN

Mr. Joe Brown SE Regional Director National Park Service 75 Spring Street, SW Atlanta, Georgia 30303

Dear Mr. Brown:

The North Carolina Coastal Resources Commission has reviewed the Draft Environmental Impact Statement and Management Plan for the Cape Lookout National Seashore. The issue of the manner in which the Seashore is managed is of extreme interest to this Commission since we have authority over guiding development in our coastal area, and ensuring that development proceeds in a manner which is in the best public interest. Our original review of the proposed plan for development in 1979 raised several points of particular concern. These were: the extent of wilderness designation; preservation of structures with historical significance; access to the park; and use of private vehicles within the park. These concerns were expressed to you in a letter dated May 2, 1979, but were received too late to be addressed in the Draft Environmental Impact Statement. We are still concerned with the position that the National Park Service has taken regarding these issues, and would like to offer the following comments as recommendations for changes in the proposed preferred management plan.

1. Extent of wilderness designation

Core and Portsmouth Islands should be designated as natural areas with wilderness area designation being limited to Shackleford Banks. The present preferred alternative for the seashore proposes to designate approximately 65% of the seashore as wilderness. The Coastal Resources Commission is concerned that such an extensive designation would leave little room for flexibility regarding future management options for the area. Although fishing, hunting, and camping would still be allowed, a wilderness designation would carry certain restrictions on the level of intensity and traditional means used to engage in these pursuits. The most obvious example of this restriction involves sport fishing. Core Banks has been recognized for years as a prime area for sport fishing. Successful pursuit of this sport has required the traditional use of motorized vehicles to follow schools of fish as they move along the surf zone. The use of motorized vehicles would be prohibited if the area were designated as wilderness, and this action would effectively exclude a large user group from a traditional use of the seashore.

North Carolina Department of Natural Resources and Community Development

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The CRC recommends that the National Park Service give serious consideration to designating only Shackleford Banks as a wilderness and designating Core and Portsmouth Islands as natural areas, and further promote a program of controlled use of private vehicles within the natural areas. This alternative would more favorably recognize traditional uses of the Banks and allow the National Park Service the flexibility for minimal development.

2. Access to and within the National Seashore

Access to the islands should be served by shallow draft ferries utilizing existing natural channels and thereby avoiding the necessity to dredge larger access channels. Transportation of both people and cars to the islands has been adequately handled in the past by shallow draft ferries operating in channels created by the kicking-out action of boat propellers. The existing routes utilize natural depth contours and are, therefore, winding and have fewer maintenance requirements due to slower fill-in periods. The present preferred management plan proposes four access points to the seashore by way of ferries from the mainland and/or Harkers Island. These access points will be facilitated by dredging four channels and four landing areas. This construction will impact on a large area of shallow water habitat and potentially impact on further valuable wetland habitat through disposal of the resulting spoil material. The initial construction of these channels and the frequent maintenance in the future will not only prove to be tremendously expensive, but will create a continuing problem of evaluating and justifying adverse impacts from dredging and spoil disposal. The CRC feels that the alternative of utilizing natural channels is both financially, and environmentally, preferable to dredging and maintaining new channels. It seems especially inconsistent that while the plan proposes to prohibit vehicles on the banks, it also proposes to construct bigger and deeper channels to have people access.

If the National Park Service feels compelled to pursue the alternative of new channel construction, they should thoroughly evaluate the justification for same in the final EIS. They should discuss in every detail a description of the dredging operation which should include acceptable methods of spoil disposal (those consistent with the N. C. Coastal Management Plan). It is the opinion of the CRC that the only way to ensure that the overall costs of new channel construction do not outweigh the benefits is to set a limit on numbers of people using the seashore. The general public and environment will not be forced to pay the costs associated with dredging bigger and deeper channels if the management strategy is initiated with limits on visitor use.

The CRC also favors allowing controlled use of private vehicles on Core Banks. Designation of the area north of Shingle Point as wilderness would prohibit the use of motorized vehicles in that area. Private transportation on the remaining natural area from Cape Lookout to Shingle Point would be prohibited, although public transportation would be provided by the Park Service. As stated earlier, recreational fishing on Core Banks has formed the nucleus of traditional activities enjoyed in the area. This activity has flourished between October and April, and has required the use of motorized vehicles. A wilderness designation would severely curtail this activity. Therefore, we favor the more flexible natural area designation for the Core and Portsmouth

RESPONSES

37 The GMP has been rewritten accordingly. The question of wilderness will be analyzed separately.

38 In the foreseeable future, we anticipate that shallow draft ferries will continue to utilize the "natural" channels that were created by the kicking-out action of boat propellers.

20 No response necessary.

40 The plan has been modified to reflect your stated concerns.

hicles could create a multitude of problems for other visitors to the seashore. A reasonable compromise could be worked out that would be beneficial to all user groups. The compromise could allow for use of private vehicles within the natural areas under a program which could include limited entry and limits on the length of stay within the park. Further controls could include restricting vehicular use to clearly designated transportation corridors, and limiting vehicular use to seasons of the year which would not adversely impact on the use of the banks area by colonial nesting birds and sea turtles.

3. Historic Preservation

The Cape Lookout Lighthouse is probably the most important structure of historical significance in Carteret County. Its very existence symbolizes the history of the forces which have shaped much of this area's culture and economic future. This structure is presently endangered by erosion of the lands lying between it and Barden's Inlet. The future destruction of this structure is imminent unless measures are taken soon to stabilize the adjacent shoreline. The Park Service has indicated that their management strategy for the seashore will be to allow nature to take its course, and, therefore, no attempts will be made to protect the Cape Lookout Lighthouse.

Banks area. We also realize, however, that uncontrolled use of private ve-

Loss of the lighthouse would mean a loss of a major tourist attraction to this area and a significant loss of a structure with tremendous historic significance. This Commission feels that all efforts should be made to implement whatever measures are necessary to stabilize the shoreline and prevent future damage to the lighthouse and its associated buildings. These measures would be consistent with Carteret County's Land Use Plan for protection of coastal and historic resources, and comply with the stated objectives of that plan concerning the preservation of areas of historic importance within the county.

The views by the CRC on the preceding issues have been submitted to the N. C. Department of Natural Resources and Community Development for incorporation into the official State response to the Draft EIS. They are being sent to you to be included in your records as an individual position established by the CRC. It has been the responsibility of this Commission to carefully and thoroughly evaluate the proposed plans by the National Park Service and make recommendations which are consistent with the N. C. Coastal Management Plan and in the best interest of the citizens of North Carolina. The decision by the Park Service to select and implement the final plan will have long term, and potentially significant, impact on the economy of the Carteret County area and the future use of a large section of North Carolina's Outer Banks. Our recommendations are being made in the hope that the Park Service will give greater consideration to traditional uses of that area and adopt a plan which will be compatible with their goals of natural area protection, and our goals of the wisest use of North Carolina's coastal resources. We request that our recommendations be given proper consideration and be included in the final Management Plan.

Dahen Clesson, Jr.

RESPONSES

41 No response necessary.

42 Please refer to responses 8, 26, and 43.

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JPC/pp

24 September 1980

Mr. Joe Brown, Regional Director National Park Service, U.S.D.I. Southeast Region 75 Spring Street, S.W. Atlanta, Georgia 30303

Mr. Preston Riddle, Superintendent Cape Lookout National Seashore P. 0. Box 690 Beaufort, North Carolina 28516

Dear Mr. Brown and Mr. Riddle:

The 15-member North Carolina Marine Fisheries Commission is statutorily responsible for protection, preservation, enhancement, and wise use of the commercial and sports fisheries resources of this state for the benefit of all its citizens. Therefore, our Commission is vitally interested in current National Park Service planning efforts for management of Park Service lands in North Carolina.

Last year we carefully studied the voluminous REVIEW OF ALTERNATIVES FOR GENERAL MANAGEMENT PLAN AND WILDERNESS STUDY for Cape Lookout National Seashore which was prepared by your agency. By letter to you of June, 1979, signed by Commission Chairman J.J. Smith, our evaluations, conclusions, and recommendations were provided for consideration and inclusion in the May, 1980 DRAFT GENERAL MANAGEMENT PLAN, WILDERNESS STUDY, AND DEVELOPMENT CONCEPT PLAN.

We have reviewed the current draft and, again, are appreciative of the opportunity to comment. However, we are both individually and as a Commission disappointed to find that our comments and concerns of June, 1979, and many similar comments of several other Commissions, as well as those of the Governor of this state were completely ignored in preparation of the present draft.

Therefore, we as members of the Marine Fisheries Commission of the North Carolina Division of Marine Fisheries, offer the following:

Whereas having reviewed the current N.P.S. draft and the enabling Congressional legislation, U.S. Public Law 89-366 of March 10, 1966, it is our interpretation that significant departures from Congressional mandate are being proposed. Initial wording of this act establishing the Cape Lookout National Seashore states, that " ... in order to preserve for public use and enjoyment an area in the state of North Carolina possessing outstanding natural and recreational values, ... "

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We believe the intent, at least in part, was to preserve the outstanding recreational values for public use and enjoyment, and the method was by preserving the area. The proposed designation of nearly 70 percent of this 55 to 60 miles of beach area as wilderness would virtually eliminate the kind of recreational fishing activity which, for nearly half a century, has been the traditional use, and other than waterfowl hunting and some commercial beach seining, represented the only use vigorously pursued along the majority of Core and Portsmouth Banks. The effect of such a wilderness designation will be a trade-off of the established traditional fishing use, for hiking and back packing, which is almost unheard of along the 50 or so miles from Cape Point to Ocracoke Inlet. We interpret this trade-off as contrary to "... preserve for public use and enjoyment..."

P.L. 89-366, Section 4, mandates that the Secretary of Interior shall permit hunting and fishing in accordance with laws of the state and the U.S., excepting that the Secretary may designate zones and seasons for reasons of safety, administration, resource management, or public use and enjoyment. Section 4 further states that:

"Except in emergencies, any rules and regulations of the Secretary pursuant to this section shall be put into effect only after consultation with the N.C. Wildlife Resources Commission and the N.C. Department of Conservation and Development."

The proposed Wilderness designation of Core and Portsmouth Banks, in opposition to this Department, the Governor of this state, and several appointed Commissions of agencies of this state would seem to preclude the Congressional intent mandated in Section 4 of this act.

Also, in a CAPE LOOKOUT NATIONAL SEASHORE STATEMENT FOR MANAGEMENT prepared by the N.P.S. it stated that " ... the purpose of the park will be to preserve and interpret for public use and enjoyment the outstanding natural, recreational, and cultural values of the park ... "

Again, by far the most outstanding recreational value proposed to be preserved is the same recreational fishing which in fact will be almost destroyed if an appropriate vehicle for the very type of outstanding fishing which exist is not allowed.

Also, the same STATEMENT FOR MANAGEMENT states in the subsection PURPOSE OF THE PARK that " ... the cultural values will be preserved and interpreted in accordance with the Antiquities Act of 1906." Probably the most significant

entire Seashore, is the Cape Lookout Lighthouse. Governor Hunt, the N.C. Department of Cultural Resources, this Commission, and several other agency commissions, specially formed citizen groups to save the Lighthouse, and hundreds of individuals have recommended and pleaded that the promised protection be provided.

On April 17, 1979, the Carteret County Board of Commissioners adopted a special resolution to the U.S. Secretary of Interior, Senator Helms, Senator Morgan, Representative Jones, Governor Hunt, and all other concerned state and federal agencies " ... and urged immediately to take all steps necessary in order that this historic structure and aid to navigation be saved."

On June 1, 1979, the N.C. General Assembly enacted House Joint Resolution 1515 - A JOINT RESOLUTION URGING THE CONGRESS OF THE UNITED STATES AND OTHER AGENCIES TO TAKE THE NECESSARY STEPS TO PRESERVE AND RESTORE THE CAPE LOOKOUT LIGHTHOUSE AND ADJACENT AREAS.

Yet, your office of the U.S. National Park Service has steadfastly held to the decision announced April 4. 1979, on a plan of no action since any attempt to halt the erosion would violate the Park Service's policy of non-interference with natural processes.

Are we to understand that an agency policy of such inflexibility is in keeping with your previously prepared STATEMENT FOR MANAGEMENT to preserve for public use and enjoyment the outstanding natural, recreational, and cultural values of the park, and to preserve these cultural values of the park in accordance with the Antiquities Act of 1906? If so, what other surprises does the future hold?

In view of the above specifics, the N.C. Marine Fisheries Commission continues to endorse the recommendations and concerns expressed in its comments of June. 1979, regarding proposed management plans for the Cape Lookout Seashore except for the comments concerning the Harkers Island administrative site. We now realize that implementation of plans for the 91-acre administrative site at the east end of Harkers Island are too far along to be drastically altered and also that suitable alternative sites are no longer available.

We urge that the final N.P.S. management plans for this particular seashore:

1 - Incorporate appropriate measures to protect the Lighthouse, its associated historical buildings, and its cultural values. We continue to believe that protection of the Lighthouse and maintenance of a navigational channel through Bardens Inlet are inter-related and protection of the Lighthouse now will help to maintain navigability of the Inlet in the future.

43 Barden Inlet was opened by a storm in 1933. It is the nature of inlets to widen, migrate, and close over time. These are normal coastal processes that man cannot control. Without dredging navigation would cease.

You suggest that protection of the lighthouse and maintaining a shipping channel are interrelated and that protection of the lighthouse now will help to maintain navigability of the inlet in the future. Maintaining navigability and protection of the lighthouse are interrelated only to the extent that channel dredging affects shoreline erosion. It is our belief that the recent actions of the Corps of Engineers--moving the channel westward and dumping the dredge spoil material offshore to the west of the light station--have been responsible for slowing the shoreline erosion rate. As mentioned earlier, if and when the lighthouse becomes threatened by shoreline erosion, NPS and the U.S. Coast Guard will consult on how best to protect the light, if at all.

Please refer also to responses 8, 26, 75, and 126.

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- 4 -

- 2 Continue to allow traditional recreational and commercial fishing involving controlled use of private vehicles on beach areas from Bardens Inlet to Ocracoke Inlet. This Commission strongly opposes a Wilderness designation for Core Banks and Portsmouth Island, but does not oppose such a designation for Shackleford Banks.
- 3 Abandon plans for attempting to dredge and then maintain channels eight feet deep (including overdepth) by 75 feet wide with three-to-one side slopes across miles of shallow sound waters. Such channels, perpendicular to inlet and sound currents, would constitute a tremendous, unnecessary, and unending expenditure of public funds and would act to hasten the time of overcrowding and subsequent imposition of visitor use limitations.
- Associated spoil materials disposed of us suggested would also destroy or otherwise adversely affect many acres of productive estuarine fisheries habitat. Also, dredged channels adjacent spoil islands and proposed government facilities would detract from the otherwise natural scene of those outerbanks. This Commission favors continuation of the traditional privately operated shallow draft type ferry services which have operated effectively and efficiently to these banks for nearly one half a century.
 - 4 Allow a small number of the "Banks Ponies" to subsist on Shackleford Banks with management as needed to control population levels. N.C. General Statutes 68-42 to 68-46, which were enacted to prohibit stock on the Outer Banks, made exception to " ... marsh ponies on banks ponies on Shackleford Banks ... " and to " ... banker ponies on the island of Ocracoke owned by the Boy Scouts and not exceeding 35 in number." Some accounts of outerbanks ponies date back to the Spanish sailing ships of the 17th century and few happenings excite the occasional visitor as much as a close observation of the ponies or the rare flushing of a ringed neck pheasant both exotic species. The Cape Lookout Seashore is the southern extreme of ringed neck

Again, we as members of the N.C. Marine Fisheries Commission, realize the complex problems involved in equitable development of resource management plans where commercial and sports fishing, recreational boating, swimming, historic, and other interests of the public are included. However, we feel it is vital that the final decisions, management plans, and implementation efforts do not, within themselves, lose sight of the traditional uses, life styles, and quality of living in the areas impacted. Again, we appreciate the opportunity to offer our

pheasants on the east coast.

RESPONSES

- 4 4 The plan now calls for controlled use of vehicles on Core Banks and Portsmouth Island.
- 4 5 In the section of the draft GMP dated May 1980 titled "Possible Future Dredging Requirements," we stated that the channels might reach a depth of six feet (not eight) including over-depth. Moreover, our figures were based on a "worst case" analysis, and channels of these dimensions may never be required. Following public review of the draft GMP, we have scaled down dredging requirements and anticipate that "the traditional privately operated shallow draft type ferry services" will continue for at least the foreseeable future. Please refer also to responses 17, 21, and 38.

46 Please refer to response 25.

comments and sincerely hope they are, this time, incorporated within the final management plan.

Sincerely,

J.J. Smith. Chairman

Commission Members:
Dr. A.F. Chestnut
Ted M. Day
Clara Everett
Monroe Gaskill
Dr. John C. Graham
Garvin B. Hardison
Edward A. O'Neal
John R. Poole
W. Earl Smith
Harold Loyd Stephenson
James L. Sutherland
Rondal K. Tillett
Virginia Tillett
Wayland F. Vereen

cc: Governor James B. Hunt, Jr.
President Terry Sanford
Secretary Howard N. Lee
All North Carolina Legislators
All North Carolina Congressmen in D.C.
John Pittman, Marine Science Council
Dr. Parker Chessom, Coastal Resources Commission
Dr. Larry Tise, Department of Cultural Resources

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Carinbrieh Country

BEAUFORT, N.C.

RICHARD L. STANLEY

October 16, 1980

Mr. Mack Riddle, Superintendent Cape Lookout National Seashore Front Street Beaufort, NC 28516

Dear Superintendent Riddle:

I am writing this letter on behalf of the Carteret County Board of Commissioners who would like to comment on the Draft Management Plan and the Wilderness Study and Development Concept Plan for Cape Lookout National Seashore Park. The Board is not opposed to the ban of vehicles on Shackelford Banks. However, the Board of Commissioners strongly recommends that the Management Plan allow private off-road vehicles from Bardens Inlet to Ocracoke Inlet along Core Banks and Portsmouth Island.

47 The use of private off-road vehicles on Core Banks should be under rules and regulations providing for permits and well-marked access areas to the beach.

Private off-road vehicles should not be banned at this time when there is a long and treasured history of vehicles traveling on Core Banks without damage to the environment and the area. Elimination of all private vehicles from Core Banks and Portsmouth Island will make it impossible for many citizens to enjoy the park for the purposes for which it was established.

The Board of Commissioners would also recommend that easements be reserved for continued dredging, maintenance and up-keep of Drum Inlet and the other inlets within the park which are important to our fishermen.

Richard L. Stanley

RLS/le

RESPONSES

 $47\,$ The plan now calls for regulated use of vehicles on Core Banks and Portsmouth Island.



ENVIRONMENTAL RESOURCES COMMISSION

CARINDREH COUNTRY

P. O. Drawer 630

BEAUFORT, NORTH CABOLINA

CARTERET COUNTY COURT HOUSE

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Sept 10, 1980

Superintendent Cape Fookout National Jeashore PO Box 690 Beaufort, N. C. 28516

Management plan for Cape Forkout dational seashere, the wildeness study and the development Concept plan the Environmental Fisources Commission recommends the following:

a The park scroice develop the national seashore ascording to "atternative 1: The Proposal" with these exceptions-

I there be no sing boat dock no water and comfort station, ne visitor orientation and shelter and no self- quided interpreture trail on Shackleford Banks

2. no Channels be dredged to accommadate large "people ferries" - only those similar to those used now at shingle point or those requiring small chansel b. The National Park Sewice award an laument to the state of north Carolina or Corpso (Engineer of New Drum Inlet so that the infet may be kept open for the small boat gisherment of core sound and the intrusion of salt

- 4.8 Since the period of public comment on the draft GMP and draft EIS, extensive revisions have been made. With respect to Shackleford Banks, we have removed all development except for one ferryboat dock and an orientation sign at Barden Inlet. We feel that this is the minimum development that will allow for public access.
- For the foreseeable future, it will not be necessary to dredge channels for large "people ferries." The channel into Back Sound from the NPS marina at east Harkers Island will require maintenance dredging to accommodate the ferryboats and NPS boats. Periodically, minor maintenance dredging also will be required for the turning basins at Shingle Point, North New Drum Inlet, and Portsmouth Village.
- 50 We recognize that New Drum Inlet is an authorized Corps of Engineers project. Although it has not been maintained, it may become necessary to do so in the future, according to the Corps.



ENVIRONMENTAL RESOURCES COMMISSION

CARINBRIBAR COUNTRY

P. O. Drawer 630
BEAUFORT, NORTH CAROLINA

c. a ferry earry passengers to the site of Don Morrie's Camps north of New Dum Inlet and that the site be developed in a limited manner similar to that proposed for the Stackeford Banks site in Plan 1 of the Park Service Development concept plan.

The Environmental Resources Commission is Charged by the Cartest County Board of Commissioners to see that our land, water and sin is protected upon the people of the county. We feel these recommendations serve all the people and protect our natural resources in a manner most suited for everyone.

Sincerely,

Joliane Pawell

Secretary

Exerconnectal Resource

Commission

RESPONSES

51 Ferryboat service will continue to North New Drum Inlet (site of Don Morris's camp) according to the plan as now written.

Atlantic, North Garolina September 17, 1980

Preston D. Riddel, Superintendent Cape Lookout National Seashore P. O. Box 690 Beaufort, North Carolina

Dear Mr. Riddel:

Enclosed please find a copy of a letter recently submitted to the editor of our local newspaper. In it we wish to clarify our stand concerning Cape Lockout National Seashore. Thank you.

Sincerely

Ishmael Worth Mason, Jr. Carteret County Environmental Resources Commission

RESPONSES

52 Please refer to responses 50 and 51, which address the points raised in your enclosure.

Atlantic, North Carolina September 17, 1980

The Editor Carteret County News Times P. O. Box 1679 Morehead City, North Carolina

Sirı

Concerning the article, Park Plan Recieves Support, Opposition , page 1B in the September 15, 1980, edition of Carteret County News Times, I wish to both add to and clarify some points. The Carteret County Environmental Resources Commission suggested that a public transportation system be installed between Shingle Point and Cape Point in that natural area, not the wilderness area, as some readers may have been lead to believe by the article.

No mention was made of our suggestion that an easement be granted at the site of New Drum Inlet for dredging maintenance in the future. We stated that if the inlet is allowed to close. the salinity in the adjacent sound will drasticly decrease, destroying an important fishery in the eastern end of Core Sound. We stated that the fresh water drainage from super-farms in the area will make the problem even worse in the future than it was in the past when Old Drum Inlet was allowed to close. Our area needs the flushing action of the inlet so that seawater will be able to buffer pollutants and maintain a high salinity in the sound nearby. The reason for our suggesting that an easement be granted at the inlet ie that the National Park Service in its "General Management Plan" indicated that it will in the future "allow inlet migration, erosion and deposition to take place naturally" and that "The natural dynamics of change will be allowed to progress throughout the seashore without man's interference." Seeing that New Drum Inlet is not listed as an exception to that policy, we sought to insure that the inlet be allowed to exist in the future.

Mr. J. J. Smith, Chairman of the North Carolina Marine Fisheries Commission, and others, during the public hearing, mentioned that inlets should be allowed to continue to flush the "inland waters."

We suggested that the site of Morris' Camps be developed in a manner similar to that proposed by the Park Service for Shackleford Banks and that a ferry run to that site, Not to the camps.

Ishmael Worth Mason, Jr.
N. C. Environmental Resources
Commission

Sincefel

Mr. Russell E. Dickenson Director Mational Park Service Interior Building 18th & C Streets, N.W. Washington, DC 20240

Dear Mr. Bickenson:

As you are aware, I have withheld any personal recommendations regarding the Wilderness Study and proposed General Management Plan/Development Concept Plan for the Cape Lookout National Seashore. It seemed to me this was the fair thing to do--from the standpoint of both the citizens of North Carolina and the National Park Service. I felt that the proposed plan raised questions that the people should decide; and I have tried to assist this process by having a member of my praff attend each of the recent public hearings. He has referred every expression of public sentiment received by my office to the appropriate National Park Service officials.

Now that the public hearings and period for citizen comment have ended, I think the record speaks for itself. It is evident that the current proposal is not supported by the majority of citizens of North Carolina because it would deny private vehicular access to the Cape Lookout National Seashore and would designate almost 70% of the Seashore as wilderness.

1. The Wilderness Proposal. The Cape Lookout National Seashere is an area of significant national value, and it is my view that it should be managed as such. Hewever, the proposed wilderness designation ignores the definition of "wilderness" as an area which should not show the effects of man's habitation. Most of the land slated for wilderness designation under the proposed plan very clearly indicates the influence of man. It has been suggested that Shackleford Banks

RESPONSES

Mr. Russell E. Dickenson Washington, DC October 14, 1980 Page Two

be designated as wilderness since its use by the public has been minimal. This seems reasonable and a proposal which I would have no difficulty supporting provided Core Banks and Portsmouth Island are allowed to remain in their natural state and open to the centrolled use of private vehicles. This type of wilderness/management alternative would allow the Park Service the flexibility to balance environmental concerns with its requirement to provide recreational opportunities to the public.

2. The Ban on Motor Vehicles. Surf fishing comprises the principal recreational use of the Cape Lookout National Seashore. The NPS's own visitor surveys show that "on an annual basis, fishing has been the most popular activity (40% of recreational use)" at Cape Lookout. Most fishermen use motor vehicles (75% by NPS estimates) because they are essential to transport the large amount of heavy equipment needed to enjoy surf fishing along the miles of isolated Seashore. The proposed ban on vehicles severely limits sportfishermen's ability to pursue the most popular activity at the Seashore. Such a ban would also have an adverse effect on physically handicapped citizens and commercial fishermen.

Because of my own concerns and those expressed by the interested citizens of North Carolina, my recommendation is that the Cape Lookout National Seashore be designated a "natural area" for management purposes with controlled vehicular access to the beaches. Such a designation would be consistent with the mandate of Congress in establishing Cape Lookout to "preserve for public use and enjoyment an area in the State of North Carolina possessing outstanding natural and recreational values."

I realize that there have been problems with the unrestricted use of vehicles at Cape Lookout in the past. However, with proper and reasonable controls, future problems can be minimal. Such regulations should seek to minimize pedestrian/vehicular conflicts, promote the maximum protection for mesting wildlife, and deal sternly with any type of vehicle-caused environmental damage. At the same time, these controls should insure that responsible surf fishermen are left free to enjoy their sport to the fullest possible extent.

In designing any specific vehicle regulations, I urge the National Park Service to consult with knowledgeable and respected surf fishing erganizations such as the United Mobile Sportfishermen, Inc. and the North Carolina Beach Buggy Association. Citizen organizations such as the Outer Banks Preservation Association can be of assistance also.

I feel these recommendations will enable the National Park Service to adapt its Cape Lookout management plan to meet the recreational needs of the people of North Carolina while protecting this most valuable natural resource for future generations to enjoy. I urge your consideration of these recommendations as an alternative to the presently proposed plan.

With kindest regards.

Sincerely,

2H

JESSE HELMS: ivj

cc: Joe Brown
Regional Director
Southeast Regional Office
National Park Service
75 Spring Street, S.W.
Atlanta, Georgia 30303

Preston "Mack" Riddel
Superintendent
Cape Lookout National Seashore
Post Office Box 690
Beaufort, North Carolina 28516

RESPONSES

53 The NPS has altered both the plan and the environmental impact statement. They are now substantially in conformance with your recommendations. Wilderness will be the subject of a separate analysis.

150

JAMES T. BROYHILL.

PRODM 2340
PRAYBURN HOUSE OFFICE BUILDING
WARRINGTON, D.C. 20518
202-225-2576

BUDGET

INTERSTATE AND POREIGN COMMERCE Congress of the United States House of Representatives Mashington, D.C. 20515

October 6, 1980

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224 MULHERRY STREET, S.W. LEHOIR, NORTH CAROLINA 28848 (704) 758-4247

PRODUCTS
PEDERAL BUILDONS
HICKORY, NORTH CAROLINA 28801
(704) 328-8718

Mr. Preston Riddel Superintendent Cape Lookout National Seashore Post Office Box 690 Beaufort, North Carolina 28516

Dear Mr. Riddel:

Enclosed is a statement which I have written regarding
54 the proposed Management Plan for Cape Lookout National Seashore.
I would very much appreciate your consideration of these remarks as well as your assistance in seeing that this statement is made part of the public record in this regard.

Thank you in advance for your time and consideration of

Thank you in advance for your time and consideration of this request.

With best regards

James T. Broyfill Member of Congress

JTB:sa Enclosure **RESPONSES**

54 The management plan has been modified and now conforms closely to the views you expressed in the statement enclosed with your letter.

RODM*2340

RAYBURN HOUSE OFFICE BUILDING
WARHINGTON, D.C. 20515
202-225-2576

BUDGET
INTERSTATE AND FOREIGN
COMMERCE

Congress of the United States House of Representatives Mashington, N.C. 20515

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GASTONIA, NORTH CAROLINA 22052
(704) 854-9922

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POOM 133

FEDERAL BUILDING

HICKORY, NORTH CAROLINA 28601

(704) 928-8718

October, 1980

STATEMENT by Congressman James T. Broyhill (R-N,C,)

Recently I received word that the National Park Service has proposed a Management Plan for Cape Lookout National Seashore which would designate a portion of Core Banks as a natural area. with the balance of Core Banks and all of Shackleford Banks and all of Portsmouth Island as wilderness areas. The use of private vehicles would be prohibited in each of these areas.

I am opposed to the Management Plan issued by the Park
Service, and I urge that the plan be re-evaluated and modified
to include provisions for the use of a controlled number of private
vehicles on Core Banks and Portsmouth Island, and designate only
Shackleford Banks as a wilderness area where the use of vehicles
would be banned.

I do not believe that the restricted use of vehicles would in any way hamper conservation efforts, nor would their use interfere with the enjoyment by others of this beautiful area. Certainly I understand the need for regulation over these beaches, and I am concerned that all the people of North Carolina have the opportunity both to enjoy these areas and to know that they are preserved properly for future generations.

However, the promosed plan, ironically, would prohibit the enjoyment of these areas by many citizens, including the elderly and the handicapped. I believe that further restrictions are unnecessary since access to the beaches is already limited by natural barriers.

15%

The Cape Lookout National Seashore is recognized for its incomparable beauty throughout the world. Access restrictions would hamper enjoyment by all surf fishermen, and would limit mobility in the area severely for all who seek to enjoy 50 miles of this beautiful area.

I urge the National Park Service to reconsider its position, and to allow for provisions which would permit a <u>controlled</u> use of vehicles on Core Banks and Portsmouth Island, and to designate Shackleford Banks as a wilderness area, and to continue its efforts to ensure preservation of the area for future generations.

WALTER B. JONES 16T DISTRICT, NORTH CAROLINA

TELEPHONE: CODE 202: 223-3101

ADMINISTRATIVE ASSISTANT

Congress of the United States Douse of Representatives

Mashington, D.C. 20515

September 23, 1980

Mr. Preston D. Riddel Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, North Carolina 28516

Dear Mack:

Enclosed is my statement evaluating the Proposed Management Plan for the Cape Lookout National Seashore. I appreciate your thoughtfulness in providing information about the proposal and hope that the Park Service can give serious attention to my suggestions.

It is a pleasure for me and my staff to work with you on matters affecting Cape Lookout National Seashore.

With best wishes, I am

Sincerely,

Member of Congress

WBJ:Wbo Enclosure **RESPONSES**

55 The suggestions you made, contained in the enclosure to your letter, were considered carefully by the NPS in the process of revising the GMP. Many of the suggestions are now incorporated in the plan.

STATEMENT BY CONGRESSMAN WALTER B. JONES ON THE PROPOSED NATIONAL PARK GENERAL MANAGEMENT PLAN CAPE LOOKOUT NATIONAL SEASHORE PARK September 23, 1980

During the past several weeks a series of four hearings has occurred, beginning

September 8 in Greensboro, on September 9 in Raleigh, on September 10 in Greenville, and

concluding with the hearing at Harkers Island on September 11. These hearings were held

following the release by the National Park Service of the Draft Environmental Impact Statement and the Draft General Management Plan, Wilderness Study and Development Concept Plan

covering Cape Lookout National Seashore Park. This plan is indeed a draft which serves as

a guide to our citizens and which is subject to modification, complete revision, or acceptance.

The Congress in its wisdom has made provisions for this series of hearings in order that the

views of interested citizens and organizations might be heard.

The Cape Lookout Park is perhaps one of the most unique of any in the entire National Park system. Thus, the General Management Plan must address a multitude of issues, including the protection of the environment and ecology, accessibility, transportation, and the wilderness potential. We must also recognize the fact that this 28,400 acre tract of public land was acquired by the U.S. Department of the Interior for the purpose of preserving it for future generations, including the elderly and the handicapped. We must also address proposed development zones, historic areas, Corps of Engineers activities so vital to maintaining navigation channels, and the search and rescue missions along with other activities provided by the U.S. Coast Guard.

I have reviewed carefully the four proposed Management Plans submitted by the National Park Service, and I share the views of the opposition to these plans. WE CANNOT BAN THE USE OF PRIVATE OFF-ROAD VEHICLES FROM BARDENS INLET TO OCRACOKE INLET ALONG CORE BANKS AND PORTSMOUTH ISLAND. I support the ban of vehicles on Shackleford Banks with the exception of those vehicles utilized by the National Park Service, Corps of Engineers, and the U.S. Coast Guard for emergency purposes only. Any general use of vehicles on Shackleford Banks could be detrimental and all caution should be exercised by the park management to insure that only emergency vehicles are utilized on Shackleford Banks.

Page 2

I feel very strongly that the management plan for Core Banks and Portsmouth Island should provide for a rigid system of permits issued to owners of private off-road vehicles, and travel corridors designated to provide well-marked access to the beach areas and located to protect environmentally fragile portions of the islands. Since the National Park Service will supervise the only public ferry service to the park, it can easily monitor and control vehicular access. Through this method the integrity of this 50 mile stretch of beautiful area can be maintained. It is imperative that we permit every man, woman, and child, including the elderly and the handicapped, to enjoy the beauty of the Cape Lookout National Seashore Park. Without the use of private off-road vehicles, this will not be possible.

The sportsmen, including the hunters and fishermen, of this nation have never created a problem on public lands, but rather have been among the first to recognize the need to preserve these characteristics for future generations. To deprive these good citizens the right to utilize that equipment essential to the pursuit of their favorite sport will result in a very unfair situation and one which I will vigorously oppose at all levels of review. We must also recognize the need of our commercial fishing interests to utilize off-road vehicles in the pursuit of their profession.

Congress passed legislation authorizing the Cape Lookout National Seashore in 1966. That statute states that the action was taken "in order to preserve for public use and enjoyment an area ... possessing outstanding natural and recreational values...." Elimination of all private vehicles from Core Banks and Portsmouth Island will make it impossible for many citizens to use the Park in the ways for which it was established. I feel certain that Congress had in mind a Park managed for multiple uses, to be enjoyed in a wide variety of ways by many citizens. This can be inferred from the report on the legislation issued by the House Committee on Interior and Insular Affairs. It estimated that the Cape Lookout National Seashore would attract one million visitors annually after five years of full operation. No one now expects visitation of such magnitude, but I cite it to show that Congress was anticipating a more traditional form of management than Alternative 1.

RESPONSES

90.1

Page 3

We must also keep in mind the role played by the State of North Carolina in the creation of the Cape Lookout National Seashore. The State was the jurisdiction responsible for acquiring the bulk of the land on Core Banks and Portsmouth Island and then donating the property to the federal government. I doubt that our State's leaders expected that the Park Service would propose to manage over 70 percent of the area as wilderness.

Even though we are primarily concerned with the environmental and ecological preser-

vation of Cape Lookout National Park, we must express concerns over the economic impact of the banning of private off-road vehicles upon the local community. While we have great respect for those who desire to fill a backpack with the bare necessities and walk along the shoreline of the Park, they make relatively small contributions to the local economy. By contrast, the vehicles utilized by the surf fishermen and hunters will indeed have a sizeable impact due to the need to purchase fuel, fishing gear, and other supplies. We must realize that local citizens have given up much of their heritage, land rights, their privileges, and in some cases their lifestyle to make this 28,400 acre area available to all mankind. Certainly they are entitled to at least some of the fringe benefits resulting from this change.

__

RICHARDSON PREYER

INTERSTATE AND FOREIGN COMMERCE

STANDARDS OF OFFICIAL CONDUCT GOVERNMENT OPERATIONS

Courses: Government information and Individual rights suscommittee Congress of the United States House of Representatives

Mashington, D.C. 20515

2344 PLAYSUMN HOUSE OFFICE BUILDING WARRINGTON, D.C. 20515 202-225-3065

DISTRICT OFFICES:

103 FEDERAL BUILDING
BUILDING 27215
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ROCKINGHAM COUNTY

September 3, 1980

september 3, 130

Mr. Preston Riddel, Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, North Carolina 28516

Dear Mr. Riddel:

56 Enclosed is a copy of the statement which a member of my staff will present at the hearing on the Cape Lookout National Seashore, on September 8th in Greensboro.

I certainly appreciate your assistance in allowing a staff member to present this statement as part of the record, and wish you good luck in conducting the hearings.

Cordia 11y

Richardson Preyer 6

RP:bj

158

RESPONSES

56 Please refer to response 55.

STATEMENT BY CONGRESSMAN RICHARDSON PREYER
ON THE PROPOSED NATIONAL PARK SERVICE GENERAL MANAGEMENT PLAN
FOR CAPE LOOKOUT NATIONAL SEASHORE
SEPTEMBER 8, 1980

It is my understanding that the National Park Service is conducting this meeting in order to receive public opinion, responses and recommendations on the proposed Management Plan for Cape Lookout National Seashore. The preferred plan as stated by the National Park Service, would designate a portion of Core Banks as a natural area and the balance of Core Banks, all of Shackleford Banks and all of Portsmouth Island as wilderness areas, which would ban the use of private vehicles.

I would like to speak out against this plan and instead to offer my support and recommendation for a plan which would allow a controlled number of vehicles on Core Banks and Portsmouth Island and designate only Shackleford Banks as a wilderness area where the use of vehicles would be banned.

By banning all vehicles from Cape Lookout National Seashore, the Park
Service would also be banning the area to a great number of people who do not
find it easy to get around, for example, the elderly and the handicapped.
Their mobility would be hampered by such a ban and they would not be able to
enjoy over 50 miles of some of North Carolina's most beautiful beach areas.
I would like to point out also that there are already 44 miles along Cape
Hatteras which are banned to vehicles and in turn banned to those who need
some form of transportation to get around.

My office has received a great deal of correspondence from hunters and fishermen, all opposing the Park Service's proposed plan to ban vehicles. This proposal would severely limit the ability of people who hunt and fish, to make full use of the area.

According to the National Park Service Draft Statement, surf fishing is the most popular activity at the Banks, with about 40 per cent of all visitors engaging in this sport. And 75 per cent of the visitors who fish use their private vehicles for the sport. Banning the use of vehicles would essentially be eliminating the sport of surf fishing almost entirely. To be effective, fishermen need to be able to carry their gear in their vehicles over the beach which extends over 50 miles. The quality of the surf fishing in that area cannot be duplicated anywhere else in this nation, and our fishermen do not want to lose it.

Also, according to statistics which the Park Service has released, currently there are only a small number of vehicles being used in the area at any one time and these vehicles are already required to register. The only way the Banks can be reached is by boat, so further restrictions on vehicles, such as restrictions on weight or tire size, would not be a difficult task to enforce. Vehicles which have been proven to be harmful to the environment, such as dune buggies or extremely large recreational vehicles, could be severely controlled and restricted, or banned entirely.

Again, I offer my support of a plan to allow a controlled number of vehicles on Core Banks and Portsmouth Island and designate Shackleford Banks as a wilderness area. We should keep in mind that the Banks should be used for the enjoyment of all. It can and should be used for recreation by the public while keeping in mind the conservation and preservation of this beautiful area.

RESPONSES



North Carolina General Assembly House of Representatives State Legislative Building Raleigh 27611

PATRICIA STANFORD HUNT 17TH DISTRICT

HOME ADDRESS;

406 Fairoaks Circle Chapel Hill, N. C. 27514

October 10, 1980

COMMITTEES:

JUDICIARY III, CHAIRMAN
BOARD OF GOVERNORS,
VICE CHAIRMAN
APPROPRIATIONS ON EDUCATION
BANKS AND THRIFT INSTITUTIONS
CONSTITUTIONAL AMENDMENTS
HEALTH

Mr. Joe Brown Regional Director of The National Park Service, U.S.D.I. Southeast Region 75 Spring Street, S.W. Atlanta, Georgia 30303

Mr. Preston Riddle, Superintendent Cape Lookout National Seashore P. O. Box 690 Beaufort, North Carolina 28516

Dear Mr. Brown and Mr. Riddle:

As a member of the North Carolina General Assembly and one 57 who has a great love of North Carolina and her natural resources I take this opportunity to strongly indorse to you my concerns for the May, 1980 DRAFT GENERAL MANAGEMENT PLAN, WILDERNESS STUDY, AND DEVELOPMENT CONCEPT PLAN that has been prepared by your agency.

I believe government should help its people and not hinder its constituencies. The plan that you propose is so inflexible and so impractical and so much of an impingement on the traditonal recreation and cultural values of the citizens of the State of North Carolina that it defeats the whole purpose of the management of resources in our State.

May I urge you to consider the proposed plan submitted to you by our own North Carolina Marine Fisheries Commission as of September 24, 1980.

 $57\ \mbox{NPS}$ considered your views in the process of revising the general management plan.

Mr. Joe Brown Mr. Preston Riddle October 10, 1980 Page Two

Of all the states on the eastern seaboard, North Carolina stands high in its coastal zone management and in its protection of the natural environment. Your ideas are not concomitant with the hopes and dreams and uses of our citizens.

Sincerely yours,

Patricia S. Hunt

PSH/cjc

cc: Mr. Joe. J. Smith L. H. Fountain

Senator Robert Morgan

RESPONSES

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163

COMMENTS



North Carolina General Assembly House of Representatives State Vegislative Building Raleigh 27611

DR. RAMEY F. KEMP 30TH DISTRICT HOME ADDRESS: P. O. BOX 361 MOCKSVILLE, N. C. 27028 COMMITTEES:

APPROPRIATIONS ON HUMAN RESOURCES AND CORRECTIONS HEALTH LOCAL GOVERNMENT I MILITARY AND ECONOMIC RESOURCES WATER AND AIR RESOURCES WATER AND AIR RESOURCES

October 10, 1980

Mr. Joe Brown, Regional Director National Fark Service, U.S.D.I. Southeast Region 75 Spring Street, S.W. Atlanta, GA 30303

Mr. Preston Riddle, Superintendent Cape Lookout National Seashore F.O. Box 690 Beaufort, NC 28516

Dear Mr. Brown and Mr. Riddle:

I have read my copy of the letter written to you by Joseph J. Smith, Chairman of the Marine Pisheries Commission. I am in total agreement with Mr. Smith and earnestly endorse his requests to the National Park Service.

Very truly yours,

Dr. Ramey F. Kem

RFK:msg

cc: Joseph J. Smith

RESPONSES

58 Please refer to responses 43 through 46.

ROBERT A. COLLIER, JR. RESIDENT SUPERIOR COURT JUDGE

October 1, 1980

DISTRICT COURT JUDGES
LESTER P. MARTIN JR. CHIEF
MUNICIPAL P. QLIVE. JR
PRESTON CORNELIUS
ROBERT W JOHNSON

Superintendent Cape Lookout National Seashore P. O. Box 690 Beaufort, North Carolina 28516

Dear Sir:

Being a lifelong resident of North Carolina, and interested in our seashores and the natural environment of our state, I wish to express my feelings on the proposed Cape Lookout National Seashore plan.

For a number of years I have visited and fished along the North Carolina coast and have been on Portsmouth Island and Cape Lookout a number of times. I was very happy when the National Park Service took over Cape Lookout as I feel that this part of the state should be preserved for the use of the public.

Since this is an isolated area, it appears to me that the fishermen would be the main group of people utilizing this area and I believe that it would be necessary to use private vehicles.

I, therefore, advocate that the area from Portsmouth to Cape Lookout be open to use by fishermen and private vehicles and that the area, Shackleford Banks, be declared a wilderness area. Enclosed you will find signatures of a number of friends and acquaintances who also agree with this plan.

Yours very truly

Hubert E. Olive, Jr.

HEO, jr/mtr

Enclosure

RESPONSES

59 This is now reflected in the plan as written.

Surf fishing has for many years been by far the major traditional sport of the Outer Banks area, including Core Banks, Shackleford Banks, and Portsmouth Island. The use of private vehicles is necessary to provide essential mobility for surf fishing. The banning of private vehicles would virtually eliminate the serious surf fishermen from some 50 miles of the nation's most productive surf fishing, and would completely eliminate commercial beach seining in these areas.

We, the undersigned, feel that an area of public land such as this should be for use by all citizens and should be so managed as to best meet the recreational interest which the nature and location of the area affords. This can be done in the Cape Lookout National Seashore by designating Shackleford Banks as a wilderness area, and Core Banks and Portsmouth Island as natural areas with controlled use of private vehicles permitted.

We, the undersigned, respectfully petition the National Park Service in its Munagement Plan for the Cape Lookout National Seashore to provide specifically for the use of private vehicles in a controlled fashion on Core Banks and Portsmouth Island, and in this way retain for surf fishermen an experience which cannot be duplicated on any shoreline in the nation.

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RESPONSES

vehicles in all areas.

Surf fishing has for many years been by far the major traditional sport of the Outer Banks area, including Core Banks, Shackleford Banks, and Portsmouth Island. The use of private vehicles is necessary to provide essential mobility for surf fishing. The banning of private vehicles would virtually eliminate the serious surf fishermen from some 50 miles of the nation's most productive surf fishing, and would completely eliminate commercial beach seining in these areas.

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We, the undersigned, respectfully petition the National Park Service in its Management Plan for the Cape Lookout National Seashore to provide specifically for the use of private vehicles in a controlled fashion on Core Banks and Portsmouth Island, and in this way retain for surf fishermen an experience which cannot be duplicated on any shoreline in the nation.

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RESPONSES

September 30, 1980

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Editorial Offices
Nation America

William A Schneide

324 Fuller Helena, Minitana SWUF

60

Mr. Mark Riddel, Superintendent Cape Lookout National Seashore P. O. Box 690 Beaufort, North Carolina 28516

Dear Mr. Riddel:

Please include this letter in the official hearing record on the proposed Cape Lookout Wilderness.

The American Wilderness Alliance is in complete support of the National Park Service proposal to designate some 13,000 acres of the Cape Lookout National Seashore as wilderness.

The Alliance is a national non-profit organization dedicated to promoting the conservation and wise management of the nation's decreasing wilderness, wildlife habitat and wild river resources.

Many of our members and cooperators are acquainted with this beautiful North Carolina seashore area and its islands and can attest to their suitability for a wilderness classification. Moreover, it is highly desirable that, for the sake of humanity and wildlife, these units should be set aside from the noise and ravages of civilization. Extremely few areas exist in North Carolina where man and his works do not prevail. This seashore and some of its islands deserve protection, so that, for man's benefit, nature may prevail.

Beach buggies swarm over much of America's coastline, destroying the quiet and solitude and frequently harassing wildlife. Surely, it is not too much to ask that this small seashore acreage and its undeveloped islands be given wilderness sanctuary from these mechanized monsters.

Sincerely,

Clifton R. Merritt Executive Director

CRM: lw

RESPONSES

Following agency and public analysis of the draft GMP and EIS, the NPS has decided to modify its proposal to allow private vehicles to continue on Core Banks/Portsmouth Island under regulation. Among these is restricting use to a designated corridor to protect wildlife, vegetation, and other recreationists. The issue of wilderness will be addressed in a separate analysis which will be available in the near future.



Founded May 18, 1897

CONSERVATION

ENVIRONMENTAL EDUCATION

NATURAL SCIENCE STUDIES

AUDUBON NATURALIST SOCIETY OF THE CENTRAL ATLANTIC STATES, INC.

8940 JONES MILL ROAD

Washington, D. C. 20015

HEADQUARTERS TELEPHONE: 301—652-9188
WHITTELL FIELD ECOLOGY CENTER TELEPHONE: 301—652-5964

November 12, 1980

Mr. Mack Riddel Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, N.C. 28516

Re: Draft General Management Plan and Wilderness Study

Dear Mr. Riddel:

The Audubon Naturalist Society of the Central Atlantic States files these comments specifically to support proposals to ban off road vehicle traffic from Cape Lookout National Seashore and to recommend establishment of a significant portion of the Seashore as wilderness.

I. Statement of Interest

The Audubon Naturalist Society of the Central Atlantic States, Inc. is an incorporated non-profit society dedicated to increasing public understanding of natural history and of the basic importance of preserving and renewing our natural resources. It was founded in 1897 and is one of the oldest autonomous naturalist societies in the United States. Its objectives are to foster scientific studies of wildlife and other natural resources, and to publish the results of its observations and studies; to protect birds and other wildlife and the environment on which they depend; to promote establishment and preservation of sanctuaries and other natural areas; and to further sound conservation practice. ANS currently has over 5000 members.

Mr. Mack Riddel November 12, 1980 Page 2

II. Banning Off Road Vehicles

ANS strongly supports banning ORVs from the full length of Cape Lookout National Seashore.

One of the most obvious characteristics of barrier islands is their fragile ecology. Dunes and beaches consist of shifting sands that are easily displaced by wind, waves, and humans. Grasses and other vegetation act as important stabilizers of the loose sand, but such vegetation is extremely vulnerable to disturbance. Birds and other wildlife, which in turn often depend on the vegetation for food, nesting or protective cover, are also extremely vulnerable to displacement. Shore birds, for example, which have adapted to nesting on the ground, are easily driven from their nests by people, vehicles and pets, leaving eggs and chicks to die.

In this fragile environment, human activity -- in particular, activity involving heavy, powerful, motorized vehicles -- is potentially highly destructive and must be controlled. The environmental damage done by ORVs has been clearly demonstrated by Steven Leatherman's studies for the National Park Service. Leatherman's work has documented the facts that (a) ORVs cause substantial damage to sand dunes by increasing erosion and breaching of dunes and increasing the likelihood of overwash; (b) ORVs rapidly destroy vegetation so that, for example, a couple of days traffic will kill dune grass; (c) ORVs' compaction of the wet beaches and of wetlands behind the dunes kill animal species living in the soil, as well as vegetation; and (d) ORVs are highly destructive of bird colonies, despite efforts to control ORV traffic around nesting areas.

To the extent dune erosion increases the risk of overwash, there is the increased likelihood of substantial economic harm, in addition to altering the island's ecology. Barrier islands and their dunes provide extremely important storm protection to mainland areas, so that, as ORVs erode dune lines, storm damage from flooding human structures behind the dunes and on the mainland is likely to increase. Damage to fisheries and mainland recreational values may also occur.

Moreover, the damage by ORVs is virtually uncontrollable. Experience demonstrates that many ORV drivers are not inclined to obey rules limiting the routes to be used; and changing beach

RESPONSES

61 The plan as now written calls for regulated use of vehicles on Core Banks and Portsmouth Island. It is the NPS position that such a plan will allow for visitor use while protecting primary park resources.

Mr. Mack Riddel November 12, 1980 Page 3

width, due to tides and sand movements, can compel even law abiding ORV users to depart from compacted beach routes. Once visible tracks are established across and behind the dunes, additional ORV drivers tend to follow them. Thus, banning ORVs is, in fact, the only effective way to control them.

In addition to the crucial function of protecting significant areas of undisturbed coastal habitat, prohibiting ORVs is consistent with the important goal of protecting a few beaches from encroachment by the noise and machinery of modern urban life. As discussed below, people need to have the potential to escape to the simple peace of uncrowded beaches. Treating Cape Lookout as an ORV playground is at odds with this need to establish reasonable coastal sanctuaries which are truly peaceful and free from mechanization and the pressures of modern life.

III. Wilderness Recommendation

ANS also strongly supports the proposal to recommend that Congress designate approximately 13,000 acres of Cape Lookout National Seashore as a wilderness area.

As noted above, the ecology of barrier islands is extremely fragile and susceptible to harm from human exploitation. Although obviously less destructive than ORVs, heavy usage by pedestrian traffic can also harm dune lines, vegetation, birds, and terrestrial wildlife. This has clearly been demonstrated by experience on barrier islands up and down the East Coast. Thus, providing even a slight limitation on human usage along some sections of barrier islands.would be a substantial aid to protecting the species which depend on coastal habitat -- little of which remains unharmed along the East Coast.

In addition, it is important for human reasons to assure that a few examples of coastal habitat are protected from overcrowding. There is something special to the human spirit -- a sense of freedom, a sense of release -- which comes from walking an uncrowded beach. Unfortunately, unless a reasonable number of beach areas are afforded long term protection, this unique experience may be lost to future generations. Yet, far too little of the East Coast has been afforded the type of protection which is needed.

RESPONSES

 $62\,\mathrm{The}$ issue of wilderness will be analyzed in a separate planning document.

Mr. Mack Riddel November 12, 1980 Page 4

Cape Lookout National Seashore is a prime candidate for wilderness designation, and the National Park Service and Congress would do well to add the proposed area to the wilderness category now, before it is too late. Wilderness protection will certainly not halt human usage, but it will afford a unique opportunity to the public to escape the crowds found elsewhere. At the same time, it will help to preserve a piece of our national heritage — undisturbed beaches and their accompanying species of plants and animals — for our children and theirs.

Please place the Audubon Naturalist Society on your mailing list for copies of all future notices, decisions, and recommendations.

Respectfully submitted,

William H. Penniman

Vice President for Conservation

cc: Mr. Russell E. Dickenson Director, National Park Service

Superintendent, Cape Lookout National Seashore, P. O. Box 690, Beaufort, North Carolina 28516

Dear Sir:

The Committee to Preserve Assateague, under its By-Laws, has as its purpose "to protect the ecological health of Assateague Island and all other endangered areas where land meets water along the Atiantic coast of the United States, so that their natural wonders and recreational advantages may be enjoyed now and by future generations." We thank you for sending us a copy of the draft environmental impact statement, general management plan, wilderness and development concept plan for Cape Lookout National Seashore, and weicome the opportunity to comment. Having had rather a comprehensive tour of Cape Lookout several years ago with Dr. Paul Godfrey, I feel I have sufficient first-hand knowledge to offer comments, and other members of our Board are familiar with the situation.

We really commend the National Park Service on the depth of planning and concern for the resource and providing a diverse experience for the public as demonstrated by its Proposal, Alternative 1. The many facets of the proposal are really exciting and we support Alternative 1 wholeheartedly.

Both at Cape Lookout and on Assateague Island we have seen the scars and abuses inflicted on the barrier islands by the oversand vehicles; we have also seen this at Cape Cod Mational Seashore and in other areas, such as Cape Hatteras.

Many studies have been made which conclusively show the damage ORVs do to the environment, and, as an exhibit, I enclose a copy of the article, <u>ORVs and Barrier Beach Pegradation</u>, by Paul J. Godfrey, Stephen P. Leatherman and P. A. Buckley, published in <u>Parks</u> Magazine. There are bad ORV scars on Cape Lookout, and we totally agree that such use should not be permitted on Shackelford Banks, Cape Lookout, Core Banks or Portsmouth Island. The planned public transport service from Cape Lookout Point to Shingle Point (13 miles) will give sightseers, fishermen and the handicapped ample opportunity to see areas of the island. However, there should be monitoring of the transportation service to ensure that adverse impacts and damage to vegetation, wildlife and the stability of the area do not occur. Again let me say, we strongly support prohibiting the use of private vehicles on the barrier islands of Cape Lookout National Seashore.

We are delighted that 12,990 acres have been recommended for Wilderness designation -- 2,990 on Shackleford Bands and 10,000 acres on Core Banks. Other barrier islands controlled by the National Park Service should designate Wilderness Areas. We support primitive camping with movable sanitation facilities in designated areas, but these will need monitoring to ensure overuse and damage does not occur. The three points, West Shackleford Banks, Cape Lookout and Shingle Point, for ferry boat landings should give adequate access for visitors, and the ferry from Ocracoke to Portsmouth Village will give another type of experience.

RESPONSES

63 Please refer to response 61.

64 Please refer to response 62.

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-2-

The National Park Service is to commended for planning all administrative, maintenance and staff housing on East Harkers Island.

We feel the Preferred Plan (Alternative 1 Proposal) for Cape Lookout National Seashors offers protection for the fragile barrier island while offering the public a rich and varied experience on the Island. In particular, we would not want to see any more development, and we strongly feel private ORV use should not be permitted.

Sincerely yours,

Judith C. Johnson, Chairman

enc.: ORVe and Barrier Beach Degradation, by Godfrey, Leatherman and Buckley, Parks Magazine, Vo. 5, No. 2, July/August/September, 1980

RESPONSES

Route 9 Box 29 Raleigh, NC 27606 Sept. 22, 1980

Mr. Mack Riddell Superintendent Cape Lookcut National Seashore PO Box 960 Beaufort, NC 28516

Dear Superintendent Riddell:

The Board of Directors of the Conservation Council of North Carolina discussed development plans for Cape Lookout National Seashore at a meeting in Burlington on September 7. We are strongly supportive of the draft plan released by the Park Service. We concur with the recommendation that the barrier islands be closed to off-road vehicles, and we support the recommendation that 12,990 acres be designated as wilderness.

Numerous beach areas, including Cape Hateras National Seashore, are already available for ORV use. We feel that it is most important to preserve the natural environment of Cape Lookout to the greatest extent possible. With public access guaranteed by other means, we see no reason to permit ORV use, and would find such use detrimental to the other purposes the Seashore will serve.

We commend the National Park Service for its leadership in this matter.

Sincerely,

Lavon B. Page

President, CCNC

cc: Hon. Robert Morgan

Hon. Jesse Helms

Hon. Ike Andrews

lion. Charles Rose

Hon. Walter Jones

Hon. Stephen Neal

RESPONSES

65 Wilderness will be addressed in a forthcoming analysis. Your comments will be considered in that analysis.



THE CONSERVATION COUNCIL OF NORTH CAROLINA

307 Granville Rood, Chapel Hill, N.C. 27514 (919) 942-7935 or 942-1080 (24 hours)

October 10, 1980

Superintendent Cape Lookout National Seashore PO Box 690 Beaufort, NC 28516

RE: Proposed Cape Lookout National Seashore

Dear Superintendent:

Many of the 500-plus members of the Conservation Council live on the coast and almost all of us are frequent visitors of the beaches. We come to fish, swim, and relax, and to observe the abundant wildlife of the barrier islands. It upsets us to see beaches that are compacted into parking-lot hardness with dunes that are flattened. Sand that is discolored and oily from exhaust and leaks makes us angry. We regret the life taken from the lowliest crab, run over by an ORV.

The Conservation Council does not wish to prohibit ORV's from all the beaches of North Carolina. We realize that for many seasons and areas the ORV is the only way to move gear into place for fishing. Furthermore, only a few ORV-users wantonly destroy the dunes. However, we urge the National Park Service to follow through on their proposed action in order that at least part of the coast can remain wilderness.

We can learn from a natural island how the waves, tide, and winds change the shape of the dunes and beaches. The educational aspects of a Natural Seashore Park that is wilderness will make it worth setting aside for future enjoyment. The

RESPONSES

66 The plan as now written calls for regulated use of vehicles on Core Banks and Portsmouth Island. approach to protecting primary park resources and providing for a variety of visitor uses. Wilderness will be addressed in a forthcoming analysis.

Page 2--Cape Lookout

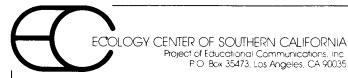
recreational uses along with the educational allows the maximum number of people to enjoy the park while doing the least environmental damage.

There are many stretches of the North Carolina coast that are open to ORV's now and many of these are good fishing places. A small part of the barrier islands need to be left as wilderness so that in years to come we will be able to have at least part of our coast left as man first found it.

Sincerely,

John Runkle

Executive Coordinator



Telephone: (213) 559-9160

October 11, 1980

Mack Riddel, Supt. Capt Lookout Nat'l Seashore Box 690 Beaufort, NC 28516

Dear Sir:

Although we fully understand that you are being daily pressured by those fanatic ORV users who would like to grind down as much wilderness area as they can manage to find unprotected, we would like to enter our dissenting view. On the only significant stretch of roadless and undeveloped barrier beach in North Carolina, and one of only two national seashores which are not connected to the mainland by bridge or causeway, ORV users are demanding the right to drive over any portion of the 55 miles of beach at Cape Lookout National Seashore, despite the fact that they've already been given use of 75 miles to the north. The Park Service has rightly recognized the need to close this area to ORV and said so in a good Draft Management Plan, which is now being opposed by ORV users.

67 We wish by means of this letter to give our total support to the Management Plan, we strongly oppose ORV use at Cape Lookout, and hope that our support letter will be placed as part of the Hearing records. We would like to stress that ORV use would be incompatible with most of the recreational and less harmful environmental uses, that ORV's not only disrupt tranquility but also destroy critical plant and animal habitat, increase erosion, increase air and water pollution -- not to mention abandoned vehicles.

Executive Director

np/es

RESPONSES

67 The plan as now written will allow regulated vehicle use on Core Banks and Portsmouth Island. The NPS feels such a plan can accommodate a variety of visitor uses while protecting park resources.

Superintendent Mack Riddel Cape Lookout National Seashore P.O. Box 690 Beaufort, NC 28516

Dear Mr. Riddel:

It is noted that a Draft General Management Plan and Wilderness Study for Cape Lookout has been released. Environmentalists and especially beach enthusiasts of Volusia County strongly support your wilderness proposal for the protection of 12,990 acres. Our recent experiences with the damage done by motorcycles and 4-wheel drive vehicles, operated by an irresponsible minority causes us to be especially concerned about the protest against restrictions on the 55 miles.

The public in Volusia County has just prevailed upon the county government to prohibit vehicles on seven miles of our approximately thirty miles of ocean front. For years we have endeavored to obtain restrictions but the "4-wheelers", by their tactics were able to prevent it. The obvious damage being done finally produced such public indignation that action had to be taken.

We hope that the fair and wise determination you have made is upheld. The vehicle enthusiasts ought to be more than satisfied with the 308 miles and leave the lesser part unspoiled.

Sincerely yours,

Walter S. Boardman

President

Environmental Council of Volusia County RESPONSES

68 Please refer to responses 66.

ENVIRONMENTAL LAW PROJECT

School of Law University of North Carolina Chapel Hill, NC 27514

Comments to

Draft Environmental Impact Statement

on

Proposed General Management Plan, Development Concept Plan and Wilderness Study

for

Cape Lookout National Seashore North Carolina

- After careful consideration of both the Draft Environmental

 Impact Statement and the Draft General Management Plan and Wilderness
 Study, the Environmental Law Project at the UNC School of Law endorses
 Alternative 1 (the proposed management plan and wilderness recommendation).
 - I. While we are much attracted to the .idea of designating 98% of the above-water land area as wilderness (contingent upon Congressional action to that effect) under Alternative 4, we feel that as a result of the apparent care the Park Service has thus far shown in planning the 13-mile corridor providing public transportation for visitors under Alternative 1, vegetation and wildlife habitat should be able to recover much in the same way there as in the wilderness areas. For example, we are especially impressed by the idea of re-routing the corridor away from the beach and low dunes during summer and early fall to avoid interfering with the nesting habits and chances of survival of the young of the loggerhead turtle (and by implication, the idea of routing the public vehicles closer to the beach the rest of the year to allow some recovery by the dune system). This kind of planning evidences admirable sensitivity to the environmental needs of the Seashore backed up by thorough-going knowledge of its ecology.
 - II. In addition, we feel that the broader interest of the public in having access to the Seashore is well served by the 13-mile public transportation system proposed under Alternative 1:
 - a. If only the most intrepid back-packers or private boat owners were to use the Seashore, as might be the case under the maximum wilderness proposal, the unique experience of solitude and timelessness amid the forces of nature would be lost to too large a segment of the public.

RESPONSES

69 The plan as now written will allow controlled vehicle use of Core Banks and Portsmouth Island. As has been stated previously, NPS believes such a plan strikes a reasonable balance by accommodating a variety of visitor uses and still protecting park resources.

ENVIRONMENTAL LAW PROJECT

School of Law University of North Carolina Chapel Hill, NC 27514

(page 2)

- b. Also lost would be the clearly educational value of exposing the public to the desirable results of conservation and of letting nature take her course to the greatest extent possible. Such concepts sell themselves in the market-place of ideas if enough of the public can see them at work.
- c. Finally, it is a clear goal of the authorizing legislation and the policy behind it to provide recreation for the general public at the Seashore.
- III. We endorse the absence of overnight accommodations in the Seashore, other than primitive camping, because this mitigates the impact of the greater public use expected in the non-wilderness area by encouraging overnight as well as day visitors to "travel light" and to "pack out what they pack in."
- IV. The Environmental Law Project cannot emphasize strongly enough its opposition to allowing the use of private off-the-road vehicles (ORV's) anywhere in the Seashore. Our reasons are:
- a. To the extent that such vehicles are used, not just to get from ferry docks to chosen hunting or fishing sites, but for "dune-buggying," "joy-riding," or "cruisin' around," the allowing of their use in the Seashore violates the letter of section 5 of Public Law 89-366 which authorized the establishment of the Seashore in 1966:

"The Secretary <u>shall</u> administer the Cape Lookout National Seashore for the general purpose of public outdoor recreation, <u>including</u> the conservation of natural features contributing to public enjoyment.' (emphasis ours; that <u>is</u> a mandate to the Secretary)

- It cannot be pretended that natural features of the Seashore are being conserved so long as ORV's are allowed to degrade physically the shape of the land, to destroy vegetation and wildlife habitat, and to disrupt wildlife directly.
- b. Hard scientific evidence contained throughout the Draft Environmental Impact Statement is at least overwhelming, and we think conclusive, in showing that private ORV use in the Seashore is a prime cause of environmental damage there.
- c. The evidence is equally overwhelming that the enjoyment of the Seashore by non-ORV users, who are by far the majority of the visitors, is unfairly disrupted by ORV users. Hypothetically, if a vocal minority other than ORV users tried to assert their "right" to create a public nuisance by altering the landscape and generating noise pollution under the guise of a "recreational" use of, say, small explosives or chainsaws, their claims would be considered ridiculous.

ENVIRONMENTAL LAW PROJECT

School of Law University of North Carolina Chapel Hill, NC 27514

(page 3)

Clearly, if we cut through the "rugged individualism-" or "pioneering spirit-" or the "I-have-the-God-given-right-to-ride-my-machine-anywhere-I-want-" rhetoric of the ORV enthusiasts, their assertions are no better.

d. The uniqueness in this region of the barrier islands that comprise the Seashore, which is an argument for the inclusion in the National Wilderness Preservation System of a large portion of their acreage, is an equally strong argument for the exclusion of private ORV's from these islands. Many of North Carolina's barrier islands are developed to a greater or lesser degree. Almost all of them are accessible by road. There are already so many other coastal areas open to ORV users that we can't imagine what argument could be made for sacrificing the Seashore's uniqueness by leaving it open to private ORV use.

We see no moral, legal, social, recreational, or other justification for allowing ORV enthusiasts, a vocal minority, to determine the very character of the Seashore, a public trust, in spite of the wishes of a large majority of Seashore visitors and in spite of overwhelming evidence of the generally degrading effect of private ORV use on the Seashore.

The Environmental Law Project explicitly endorses Alternative 1, which is the Park Service's management and wilderness proposal. We also extend a contingent support for the general idea of Alternative 4 (maximum wilderness). We offer unqualified opposition to Alternative 2 (no action) and Alternative 3 (maximum development).

The Environmental Law Project is a group of concerned law students interested in research and advocacy in the area of environmental law. It is sanctioned by the Student Bar Association of the School of Law, University of North Carolina at Chapel Hill.

Sept. 9, 1980

- of BROOKHAVEN TOW!

POST OFFICE BOX 66 . PATCHOGUE, N.Y. 11772

September 4, 1980

Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, N.C. 28516

Dear Sir:

Reference the recent Cape Lookout etc. Draft/Wilderness Study and General Management Plan, we believe that the beaches should be left open for fishing vehicles from Cape Lookout to Ocracoke Inlet.

This area need not be open to pedestrian or jitney traffic. Pedestrian action behind the primary dune can destroy the dunes ability to maintain the fragile barrier islands.

A rigidly enforced vehicle permit system should be encouraged. $% \begin{center} \begin{center}$

Yours for conservation and wise use,

PRESIDENT, GSBMS

RESPONSES

70 Core Banks and Portsmouth Island will be open to controlled vehicular access under the plan as now written.

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78,

COMMENTS

Comments On Cape Lookout National Seashore, N.C.

(Draft) General Management Plan

(Draft) Wilderness Study

(Draft) Development Concept

(Draft) Environmental Impact Statement

September 5, 1980

Mr. Neal G. Guse Acting Regional Director Southeast Region National Park Service 75 Spring St., S. W. Atlanta, GA 30303

Dear Sir:

These comments pertaining to the above subjects are on behalf of 17 members of an informal fishing Club (HISS), who have been enjoying the recreation advantages offered by Cape Lookout (Core Banks) and Harker's Island for the past $12\frac{1}{2}$ years. As Purser (i.e., Secretary and Treasurer), I have been instructed to express our pleasure at the inclusion of Core and Shackleford Banks within the National Park System, and to make known in even stronger terms our categorical disagreement with some portions of these plans.

We agree that the Cape Lookout National Seashore is a unique area geographically, historically, environmentally and should be preserved. Obviously, the best way to do so is by incorporating it into the National Park System and declaring a major portion of it a wilderness area. Toward this end, we support you wholeheartedly. Major portions of your plan, however, appear to us to be so structured as to be punitive to local residents, prejudiced against previous users and inconsistent with environmental considerations and national energy conservation goals.

The following subjects will be addressed briefly since they appear to be in greatest conflict with the interests of the public and nation:

- 1. Alternate proposal selections.
- 2. Location of the administrative site.
- 3. Number and location of the ferry docks and proposed dredging projects.
- 4. Abandonment of the lighthouse area to possible destruction by erosion.
- 5. Destruction caused by continuing vehicle removal.
- 6. Prohibition of private vehicles.

- 2. Location of the administrative site.
- 72 The East Harker's Island (EHI) site is the least compatible with national energy goals and Carteret County land use plans of any of the limited site locations considered. Sites more in agreement with both of these and with far less environmental impact are available but were not considered.

Of the seven sites considered, the EHI site is least compatible with the U.S. goal of energy conservation. This site would experience 750 average daily trips in 1990 (EIS Pg. 69). Not considered in the evaluation is the energy consumption of the private vehicles of about 1,440 gallons of gas (based on 25 m.p.g., and distance per EIS Pg. 106) per day, or 129,600 gallons per 90 day summer season. Ferry boat fuel from this site would be about 98 gallons of diesel fuel per day (based on distances per EIS Pg. 106, one mile per gallon of fuel, six trips to Lookout Point and four trips to Shackleford), or 8,820 gallons per 90 day summer season. This means the EHI site would cause an estimated petroleum expenditure of 138,420 gallons per 90 day summer season.

Using the same mileage and visitor usage assumptions, the Lennoxville Point site would expend only 53,981 gallons of petroleum over the same period. Selection of a more appropriate and accessible site, such as Fort Macon or the Beaufort waterfront, would allow the Shackleford and Cape Lookout ferries to be combined and would reduce the petroleum expenditure to only 30,801 gallons, a net savings of 107,619 gallons over the EHI site, and 23,180 gallons over the Lennoxville site per 90 day summer season.

The EHI site has eliminated two marinas, two motels, and one restaurant from the Harker's Island economy (EIS Pg. 109). Of those presently available (EIS Pg. 108), this represents 50% of the marinas, 40% of the motels, and 33% of the restaurants. This has already created inflationary pressures, and overcrowding at the remaining facilities. Available sites, combined with unfavorable economics, make relief unlikely without federal subsidies or loan guarantees.

RESPONSES

71 The plan as now written calls for what the NPS considers a balanced approach to protecting park resources and providing for a variety of visitor uses.

72 The east Harkers Island site was identified in amendatory congressional action. The NPS reevaluated the site as part of the planning effort for Cape Lookout National Seashore and continues to believe the site is best suited for NPS and visitor needs.

Mr. Neal G. Guse Sept. 5, 1980 Page Three

Removal of the public accommodations as a result of premature site acquisition has caused a loss of at least 20 jobs in a community with minimal internal employment opportunities. The NPS proposal will not create sufficient replacement jobs, even on a temporary basis (Management Plan, Pg. 97) within six years. The job availability will probably deteriorate due to the influx of NPS dependents (about 28 people, assuming three person families and 14 married employees).

The proposed new entrance/exit road (Management Plan, Pg. 75) to eliminate the congestion along State Route 1335 would in fact only direct the greatly increased traffic through a residential area increasing danger to the residents, particularly children, and compounding zoning problems in a community unprepared to deal with them. (EIS Pg. 74).

The proposed site development is in opposition to the cultural and historical objectives of the Carteret County Land Use Plan (EIS Pg. 75). Claims of being able to mitigate these by routing the traffic through a residential area are ludicrous. Culture and history reside in an area or community and not along a road. Re-routing would not mitigate but may well accentuate this cultural destruction.

- 3. Number and location of ferry docks.
- The selection of the ferry docks does not appear to have been made with any consideration to minimizing the environmental impact, dredging required, or nearness to major points of visitor interest. We oppose the Cape Lookout Point area location, the Shingle Point location, and the EHI location.

The selected Cape Lookout location will require 300 feet of dredging (EIS Pg. 24) and 400 feet of boardwalk (Management Plan Pg. 79). Selection of a more appropriate site in the vicinity of the lighthouse would require no dredging, no boardwalk, better beach access, and be immediately adjacent to the historically important structures, which, it might be added, the NPS has decided not to preserve from erosion. The additional distance to be traveled by boat to the lighthouse would offer added enjoyment to the visitor's trip, particularly the handicapped and elderly who will be unable to negotiate on the island except by limited public transportation.

The inappropriate EHI site is to require 700 feet of dredging although boats to 40 feet have used the marina for years. This requirement seems to be inconsistent with the past usage.

The Shingle Point site, which requires 15,000 feet of dredging, appears to be an inappropriate location for a ferry landing and NPS visitor info point both because of dredging and the intrusion on the proposed wilderness area. Abandonment of this ferry site in favor of serving by public transportation from the lighthouse site would have far less adverse environmental impact, while providing increased isolation to the wilderness area.

Our organization has no first-hand knowledge of the Shackleford or Portsmouth sites and cannot comment upon them.

RESPONSES

73 The marina and adjacent channel at the east Harkers Island site are believed to have become more shallow through lack of use, requiring maintenance dredging before ferryboats and NPS boats can use the new facility.

74 It has been decided to continue use of shallow draft ferryboats to serve Shingle Point, where camping shelters will be built. The ferryboats will continue to transport passengers and vehicles. Maintenance dredging of the island turning basin will be required periodically, and propeller wash ("kicking-out") should suffice to keep the channel open across Core Sound.

Mr. Neal G. Guse Sept. 5, 1980 Page Four

- 4. Abandonment of lighthouse and lightkeeper's home to possible destruction.
- The lighthouse, listed in the National Register of Historic Places
 (Management Plan Pg. 24), was built in 1859 and is not only of historical value, but a landmagrk to the many small private boats using Barden's Inlet and a tourist attraction. Loss of these structures would not only be the loss of a historical tourist attraction, but would deny the small private boats their landmark to a safe anchorage during severe weather. We urge immediate re-consideration of the NPS decision to abandon these sites to erosion.
 - 5. Destruction caused by abandoned vehicle removal.
 - The continuing efforts to remove the abandoned vehicles has resulted in incalculable damage to the vegetation, animal life and dunes. This disruption has been continuing for two years and is forecast to continue for many more years (EIS Pg. 65). This destruction is to a great extent in other than the more durable beach/berm area.

Further, the removal of these vehicles exposes the dunes to erosion. Experience shows that the dunes stabilized by the vehicles weathered storms better than natural dunes. Instead of removal, these vehicles should have been put to use in dune stabilization or to prevent crosion in the vicinity of the lighthouse.

To those who know and love Cape Lookout, these vehicles were not clutter or visual pollution; rather, they were reminders of good times past and yet to come. Only the "one-time visitors" did not regard them as a natural part of the landscape and it appears NPS has ignored the environmental considerations to satisfy these individuals. By its own admission, the sea and sand will reduce most of the traces of man (EIS Pg. 76) or migrate out from under them in due time (EIS Pg. 46).

- 6. Prohibition of private vehicles.
- If the proposal as presented is a miscarriage of design, then the planned banning of private vehicles is an abortion. Many pages are spent trying to justify this decision with facts prejudicially worded or elsewhere contradicted in The Proposal and The Plan. As an example, on Page 55 of the EIS and Page 66 of The Plan, the beach/berm area is described as "most" and "more" resilient, yet on Page 81, to justify banning vehicles, the EIS says "vehicle use on the high beach would continue to break up the drift line material, where new seeds take root". The EIS makes a big deal of protecting plants and then says on Page 53 that no endangered (species) plants are on the island. In discussing visitor use (EIS Pg. 60), fishing is listed as the primary use of 40% of visitors, but in trying to justify the banning of private vehicles, it is stated only 22% of visitors fish (EIS Pg. 95). When discussing visitors, the proposal says approximately 75% of fishermen use private vehicles, but the wording is changed to less than 75% when trying to justify the banning.

RESPONSES

- 75 Erosion of the shoreline at the lighthouse has decreased. If the complex is again threatened, the NPS in consultation with the U.S. Coast Guard will decide if it can be saved and will comply with the Historic Preservation Act of 1966 and the procedures in 36 CFR 800. Please refer also to responses 8, 26, 43, and 126.
- 76 The objective of removal of abandoned vehicles is to return the island environment to a more naturally appearing state which avoids any unwarranted potential for adverse scenic intrusions.

7 7 Thank you for pointing out these apparent contradictions and for providing additional economic insight. These contradictons have been rectified.

Mr. Neal G. Guse Sept. 5, 1980 Page Five

The economic justification of the ban claiming to save fishermen the \$30-\$50 to ferry a vehicle to Core Banks by providing public transportation is correct only if the public transport were free and if it were convenient. A majority of the vehicles are used many times by parties of three to six fishermen. The actual cost of the ferry is small, insignificant in fact, when compared with the overall cost of the trip. As to the public transport being convenient, about all that can be said is that it beats walking -- but just barely. No consideration is given to the impact of the removal of between \$27,000 and \$45,000 from the economy of the small communities if vehicle ferrying is denied.

The most misrepresented economic fact is the effect on the economy of small communities if the "surf anglers choose not to return" (EIS Pg. 72). The comparison of the surf anglers' expenditures to the fishermen's expenditures in Carteret County as a whole is not a correct or defensible comparison. If it were not for the surf anglers, it is extremely doubtful that a motel or restaurant could survive in Harker's Island or Davis. Additional dollars, large in a small scale economy, are spent on tackle, gas, boat repair, boat storage, etc. The surf fishermen are a major factor in these economies, but not the one day, single purpose tourist.

The protection of the loggerhead turtle (EIS Pg. 86) is another excuse to ban private vehicles. The EIS indicates (Pg. 61) that fishing, therefore the use of private vehicles, is a minimum during nesting season, but the number of tourists are at a peak. The EIS does not address the prevalent problem of predation by tourists who, through ignorance or design, are cruel to helpless wild animal young. Since NPS is dedicated to increasing park usages, this should and must be addressed as to magnitude in comparison to vehicle impact.

We, the members of HISS, are unanimous in our opposition to drafts of both the General Management Plan and the inadequate environmental impact statement. Our objections are in part outlined above. We stand ready to supply representatives to discuss the objections further if NPS or the U.S. Department of the Interior is interested in modifying them so they serve the using public and not just the one time tourist.

As a minimum, we believe the plan must be modified to better and more correctly address those points outlined above.

Yours very truly.

G. B. Harvin, Jr.

Purser (Secretary & Treasurer)

GBH:pn

cc: Superintendent Cape Lookout National Seashore P. O. Box 6°

RESPONSES

78 We are committed to monitor "predation by tourists." Should it occur we will take appropriate action which could range from personal contact with visitors to closing off sections of the beach when hatchlings are present. (See appendix B.)

LEAGUE OF WOMEN VOTERS OF GUILFORD COUNTY

314 NORTH DAVIE STREET GREENSBORO NORTH CAROLINA 27401

October 3, 1980

Cape Lookout National Seashore P.O. Box 690 Beaufort, North Carolina 28516

Dear Sirs:

The League of Women Voters of Guilford County, North Carolina supports Alternative I (the Proposal) as stated in the Environmental Impact Statement and the General Management Plan for the Cape Lookout National Seashore.

The few remaining open areas of the outer banks are ecologically and physically fragile areas that need to be protected from the heavy development and use that will eventually result. The existing litter and destruction of the area is an indication of the need to protect this last undeveloped stretch of the outer banks.

We appreciate the chance to express our League's position on this matter.

Carolyn Illen Presidnet **RESPONSES**

79 No response necessary.

October 6, 1980

Superintendent, Cape Lookout National Seashore P. O. Box 690 Beaufort, NC 28516

Dear Sir.

Under ordinary conditions a National Seashore is established to prevent the incursion of man on our ever-decreasing beach fronts and to preserve them for future generations. Lately, this basic premise has been pushed from this sublime reasoning to the point of ridiculous incongruity by assuming that these seashores must be protected from every conceivable man-made pursuit.

The latest point is the attempt to establish the Cape Lookout National Seashore as a Wilderness Area. Traditional use of this natural resource has included hunting, bird watching and mobile surffishing, among a myriad of other natural-resource uses. Wilderness designation will limit use of this national park to nonvehicular activities only.

Please be advised that the Long Island Beach Buggy Association is vehemently opposed to the establishment of a Wilderness Area anywhere on the Cape Lookout National Seashore. The hardships which would accrue to surf fishermen trying to plie their sport without the use of vehicles would be all but insurmountable and would result in unjustified discrimination against this segment of the sporting community. It would also mean the loss, forever, of access to one of the most productive surf fishing locations on the east coast.

Please count this letter as an official "Nay" in the voting for Wilderness designation.

Very truly yours,

LONG ISLAND BEACH BUGGY ASSOCIATION, INC.

BRUCE L. WOLFSON President

cc: United Mobile Sportfishermen, Inc.

RESPONSES

80 The plan as now written allows controlled use of vehicles on Core Banks and Portsmouth Island. The issue of wilderness will be addressed in a separate analysis.

<u>%</u>

MASSACHUSETTS BEACH BUGGY ASSOCIATION, INC

Sept, 27, 1980

Mr. Frestem Riddle, Supt. Cape Lockeut National Seashere P.O. Bex 690 Beamfert, N.C. 28516

Re:- National Park Service Proposed Plan
for
Came Lookout National Seashere

Dear Sir:

After going ever this preposal, I am utterly amazed at the lack of management capabilitys our N.P.S. has. The reasons for this statement should be entirous. N.P.S. deasn't have the capability to manage and centrel, so close it down. If that were to be the case we wouldn't be driving on any of our highways. It's a good thing N.P.S. deem't have that duty.

M.B.B.A. is the eldest Beach Buggy Assec. 1949 was the beginning for us. Our code of othics have been the basic foremat for all organizations. We have been working with N.P.S on Cape Cod with Rules and regulations, and other team beachanthorities for years. We have rules that we abide by and help enforce, senetimes we have to go to court and testify. But this is the only way to protect our privaledge as fisherman enour beaches.

AS a mebile surffisherman and a family of three children and a fisherparama as my wife we fish the east coast for our vacation. Take our surffishing veh, away and you take away a whelesome way for a family to have a vacation.

There for, our erganisation is totally against any more closures on N.P.S. Seaskeres at Cape Leekaut, or any other N.P.S. as well as Cape God. One last thing before I close, I think and know that a total disregard for the surf-fisherman in the planning of Cape Leekaut and disregard for the citisens of this U.S.

If you look the Moma Liza in a wault only the N.PS. will enjoy that too.

Respectfully submitted

Lioyd E. Hebb Jr.

Pres. M.B.B.A.

Fef Beach Conservation and Recreation

190 OFFICERS

PRESIDENT
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EXECUTIVE SECRETARY
CLIFFORD WHITE
265 Berry Street
Wrentham. MA 02093

AFFILIATIONS

United Mobile Sportsfishermen Mass Council of Sportsmen National Wildlite Refuge Assn. Save Our Stripers Inc. **RESPONSES**

81 NPS believes surf fishing interests are adequately accommodated in the plan as now written.

Mr. Mack Riddel Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort NC 28516

Dear Supt. Riddel:

We appreciate the opportunity to comment on the Draft General Management Plan and Draft Wilderness Study for the Cape Lookout National Seashore. We hope the folloiwng comments prove constructive in the endeavor to complete a final management plan study.

ORV Use: In recognition that Cape Lookout is one of only two National Seashores remaining unattached to the mainland (Cumberland Island National Seashore being the other), and that one of the primary reasons for establishing Cape Lookout National Seashore was to preserve the area in its natural state, we strongly encourage the prohibition of all ORV use in the area. There is presently an abundance of North Carolina's 308 mile shoreline open to ORV use. Thus a restriction on 55 miles of this coast line, which is inaccessable by road, to only foot traffic (not accounting for the 13 miles of public transportation) would seem a welcome relief to visitors desirous of peace, solitude, and safety. As was stated in the Plan, public comment had previously been overwhelmingly (75%) in favor of elimination of private vehicle use along this coast. As it is, the unlimited private boat access and hiking privileges seem quite fair to visitors while permitting appropriate protection of the Seashore. The extra miles of boat or foot travel proposed might prove refreshing to the ORV user in a wilderness setting. If not, there are numerous other roadaccessible beaches in North Carolina to drive their vehicles on. Furthermore, the ban on ORVs will decrease erosion problems and destruction of flora and fauna and thus enhance the natural processes of these barrier islands. Finally, restricting all ORV use will increase the enjoyment of those visitors who find these vehicles dangerous and their noise obnoxious.

Wilderness Designation: Compromise was obviously used in deciding which areas were to be recommended for Wilderness status. Although inclusion of the area on Core Banks from Cape Lookout Point to Shingle Point would have been preferable, the designation in the proposal seems adequate. Special care must be taken not only in the wilderness areas, but elsewhere along the coast to ensure that man remains only a passive observer, leaving barrier island dynamics unaltered. These natural coastal areas are fast

National Parks & Conservation Association, 1701 Eighteenth Street, N.W., Washington, D.C. 20009 telephone (202) 265-2717

RESPONSES

<u>.</u>

Supt. Riddel - 2

disappearing as development and incompatible recreational uses destroy their natural conditions.

Finally, the federal government should acquire all estuarine habitat surrounding the National Seahsore. Estuaries have been found to be some of the most productive areas on earth. As such, they should be given the greatest amount of protection possible to ensure their continued nautral, scientific, recreational, and commercial values.

Dredging Activities: In all cases, dredging should be minimized to avoid its damaging affects on biota. That which is needed should employ the best available technology to minimize environmental impact. Moreover, the dredged spoil should not be deposited on or around any portion of the National Seashore, for such activity could destroy estuarine habitat and other Seashore features, constitute human interference in the area and thus violate wilderness designation. Therefore it is recommended that the spoil be deposited in the boat basin on east Harkers Island/where plans already exist for obliteration as stated on p. 90 of the Management Plan. Dredged spoil should not be pumped across the island and deposited on the beach.

Carrying Capacity and Visitation: The carrying capacity determination should be preventative in nature—implying that visitor activity must avoid initial damage rather than requiring repair later. As you know, carrying capacity determination for each NPS area is now required by law. Furthermore, the initial visitor quotas and types of activity should purposefully be set low and gradually worked upwards as more data becomes available.

Electrical Power Generation: It is strongly suggested that electric power for development facilities and ground water pumps be provided by some means of solar power--whether through photo-voltaic systems, windmills, or tidal action. In the long run this will prove more economical than purchasing costly fossil fuels and paying for their transportation to the islands. Also, this will set a good example, for other park areas and the public, that NPS institutes progressive programs to meet the problems of today in a sensible and environmentally conscious way.

Cultural Resources: We agree with the proposed plan's rejection of human interference to control natural beach erosion, even though we recognize that it may not be possible to save the Cape Lookout Lighthouse complex. However, we agree that if this erosion terminates naturally, renovation of the lighthouse and the grounds should proceed as planned. Contrarily, we support your preservation and restoration activities at Portsmouth Village which, like Cape Lookout Lighthouse complex, is listed in the National Register of Historic Places.

- 82 Acquisition is contrary to state law.
- 83 Dredging requirements have been reduced greatly. We do plan to use spoil material to obliterate the unneeded marina at east Harkers Island. Beyond that, there may be periodic maintenance dredging required at island ferryboat turning basins.

- 84 The GMP contains a discussion of carrying capacity. For the foreseeable future, with continuation of the present modes of access, we do not expect a significant increase in visitation that would adversely affect the resources. We recognize the need to monitor the situation and have so stated.
- 85 We are exploring all possible alternatives to fossil-fuel-driven pumps.

Supt. Riddel - 3

Visitor Impact: The plan states that backpackers may move and set up camp at any location. This should be permissible as long as campsite impact does not damage the natural barrier environment. If such impact occurs, designated campsites should be required for all overnight visitors. In areas of sensitivity and high visitation (outside of the proposed wilderness area) it is strongly recommended that portable sanitary facilities be provided. In addition, it may be desirable to use a free permit system to keep track of use levels and locations.

Threatened or Endangered Plants and Animals: All threatened or endangered plants and animals should receive priority protection. No visitor activity should be permitted in any habitat of these organisms unless there is complete assurance that humans will not adversely affect them.

In conclusion, we feel that at Cape Lookout National Seashore there is an excellent opportunity to preserve a natural barrier environment—free from man's adverse impact. Thus only the most environmentally conscious technology should be employed. Only nature's own impacts should be felt, observed, and protected and interpreted. Thank you for the opportunity to comment on the Draft plan. Please keep us informed of your decisions and subsequent actions.

Sincerely

T. Destry Jarvis
Director of Federal Activities

TDJ:11

RESPONSES

86 We agree.

87 This is required by law. See appendix B.

19

Natural Resources Defense Council, Inc.

122 EAST 42ND STREET NEW YORK, N.Y. 10017

212 949-0049

Washington Office
1725 1 STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20006
202 223-8210

October 10,1980

Western Office

25 REARNY STREET

SAN FRANCISCU: CALIF. 94108

415; 421-6561

Superintendent Riddle Cape Lookout National Seashore P.O. Box 690 Beaufort,North Carolina 28516

Re: INT DES 80-44, Draft Environmental Impact Statement on the General Management Plan/Wilderness Study/Development Concept Plan for Cape Lookout National Seashore

Dear Superintendent Riddle:

The Natural Resources Defense Council (NRDC) is a national, non-profit, environmental organization with over 45,000 members. In May 1978, NRDC submitted comments on the Environmental Assessment of Alternatives for the Cape Lookout General Management Plan and Wilderness Study. NRDC requests that the following remarks on the draft Environmental Impact Statement for the same matter be submitted into the record. NRDC is joined by the Barrier Islands Coalition and the Coast Alliance in filing these comments.

In our comments on the Environmental Assessment, NRDC supported Alternative 5, the maximum wilderness alternative. Some elements of Alternative 5 have been incorporated in Alternative 1, the proposed action of the dEIS. NRDC supports proposed wilderness status for Shackleford Banks and Core Banks/Portsmouth Island, the existence of only primitive camping facilities, and the elimination of private vehicle use on the islands. These elements of the preferred alternative are consistent with the fundamental goal of managing the Seashore as a natural barrier island system.

The use of private vehicles on these islands, particularly on Core Banks, has had a detrimental impact on dunes and vegetation in the past. The discontinuation of the use represents an inportant step in meeting resource management objectives. NRDC strongly endorses this action.

Other elements of the proposal, namely on-island transportation and visitor-interpretation centers, originated from other alternatives of the Environmental Assessment. We recognize that the proposed action strikes a reasonable balance between

73 100% Recycled Paper RESPONSES

88 The issue of widerness will be addressed in a forthcoming analysis. The plan as now written allows controlled vehicle use of Core Banks and Portsmouth Island. However, recent experience indicates that such a plan can protect park resources and still allow a variety of visitor uses.

89

all the alternatives set forth in the Environmental Assessment and includes a major portion of the Seashore in the Wilderness Proposal. NRDC thus supports the prefferred alternative. Our support, however, is conditional as we continue to be concerned about the development aspects of the proposal.

Visitor facilities should be kept at a minimum, limiting the environmental impacts and allowing the visitor to enjoy the wilderness experience. In addition, an on-island transportation service should be considered a projected need rather than a planned part of the proposal. Insufficient visitation statistics and the current heavy use of the Seashore by visitors in private boats do not justify this costly undertaking. Implementation of this part of the proposal should be delayed pending the completion of a satisfactory transportation study and a clearly demonstrated need for such a service. The elimination of the portion from Cape Lookout to Shingle Point from potential wilderness designation is a significant weakness in the proposal.

Cape Lookout National Seashore is a unique land resource. It is the longest stretch of undeveloped shoreline left in North Carolina. It is also among the most outstanding natural barrier island systems remaining in the country. Every effort should be made to provide for full protection of the area.

Thank you for the opportunity to make these comments.

Lesli Rice Resource Specialist Land Use Project **RESPONSES**

89 The plan calls for only limited development to provide for visitor needs and to protect park resources.

195

Neuse River Council of Governmertis.

P.O. Box 1717 - 1404 = Neuse Blod. - New Bern, N.C. 2855.

Idephase 919-648-3185

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		1	Date: Augus	t 28, 19	80	_
SCH # E-81-5026	General Management	plan & En	vironmental	impact s	tatement	(Draft
	Project Title/Count	у				
(est	imated)	N/A				
Funds Requested	Funding Agency					
Please attach this ing agency.	form to your applicat	ion before	submitting	it to the	e fund-	

Applicant: U.S. Department of the Interior National Park Service, Washington, D.C.

Project Description: Notice of Availability of Draft Environmental Statement on Proposed General Management Plan, Development Concept Plan and Wilderness Study and Notice of Public Hearings Regarding the Wilderness Study/General Management Plan-Development Concept Plan - Cape Lookout National Seashore, N.C.

REGIONAL REVIEW OF THIS PROJECT IS COMPLETE. The project has been reviewed by and through the Regional A-95 Clearinghouse with comment(s) as follows: (You should proceed to complete formal application for submission to appropriate agency. This statement and its attachments MUST be attached to your formal application.

- (X) 1. Project is consistent with regional and local goals, policies, programs, and fiscal resources and is recommended for further development.
- () 2. Project is recommended for further development with attached recommendations for strengthening it.
- () 3. Project is recommended for further development if attached specific and major changes are incorporated into project by funding agency.
- () 4. Project is not recommended for further development based on attached comments.
- () 5. Project has been waived from A-95 review.

NOTE TO FUNDING AGENCY:

The review and comments for this project are valid until 8-28-81 . If the project is considered for funding after this date, please resubmit the application for an additional 30 day review.

RWQ:cas

90

cc: Chrys Baggett

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RESPONSES

90 No response necessary.

Treasurer WHITNEY H. MYERS

President WILLIAM F. ANDERSON

MEMBER
N.J. STATE FEDERATION OF SPORTSMEN'S CLUBS
UNITED MOBILE SPORTSFISHERMEN INC.
ASSOCIATION OF SURF ANGLING CLUBS
NATIONAL WILDLIFE FEDERATION
AMERICAN LITTORAL SOCIETY
SAVE OUR STRIPERS, INC.
LEAGUE FOR CONSERVATION LEGISLATION

Membership Secretary BRUCE C. ALLEN 33 Indian Ann Trail R.D. #2 Vincentown, N.J. 08088

Vice President ROBERT A. COLLEPARDI Recording Secretary FREDA E. ANDERSON 75 S. White Horse Pike (Rt. 30) Stratford, N.J. 08084

September 5, 1980

National Park Service Superintendent, Cape Lookout National Seashore P.O. Box 690 Beaufort, N.C. 28516

Dear Sir:

My name is Dick Moreland, and I am a representative of the New Jersey Beach Buggy Association (NJBBA). The NJBBA has over 900 members, and a large number of these members have been active in beach and conservation rejects all along the Atlantic seaboard for many years. We have carefully read and studied the May 1980 drafts of the National Park Services' General Management Plan and the Environmental Statements for the Jape Lookout National Seashore. We have assessed each of the four alternative plans presented in the drafts with respect to each plan's effect on recreational use and the environmental impact it will have on these seashore areas.

The drafts on the management plans and environmental statements for Cape Lookout National Seashore are long and cover a wide range of subjects with respect to this area, as well as other seashore areas along the Atlantic scaboard. It would be impossible to speak on all the important issues covered in these documents, so my presentation here will be limited to the position the NJBBA and all its members support.

NJBBA believes that public lands, such as the Jupe Lookout National Seashore, should be used by all citizens and that public lands should be managed in such a may as to supply the best recreation nature and the location can provide. To take the best surf fishing areas of the nation army from the public is not in tune with those objectives. They can only be achieved if both rortsmouth Island and Jore Banks are left as they are at the present time. NJBBA supports the position that both Portsmouth Island and Core Banks should

19

RESPONSES

91 The plan as now written incorporates many of your suggestions.

remain as they are now with the limited ferry access and with the controlled use of private vehicles. The present ferry system with its restricted capacity automatically limits the number of vehicles that can be on these islands at any one time, and a vehicle-permit system now controls the operation of the vehicles on these islands. This arrangement is unique in that it gives the NPS complete control of all—not part, not some—but all of the vehicles coming to and going from these islands.

The NJBBA does support the controlled use of private vehicles traveling for recreation to the remote areas along the 50 miles of beach front on Portsmouth Island and Core Banks. There are no justifiable reasons for vehicles to run over the vegetation, marsh areas, sand dunes, or other areas where vehicles would cause ecological damage, because there is adequate beach front on both islands to reach most, if not all, of the useable, remote areas.

But the NJBBA does not support any further development of these islands, as proposed by the NPS in several of its alternative plans. The use of vehicles to reach otherwise inaccessible areas is not a signal to further develop the islands with boat docks, comfort stations, or the dredging of channels. Don't we have enough of this type of recreational area at Cape Hatteras? We only support a plan that leaves the islands as they are now and keeps them that way.

Surf fishing has been the major traditional sport of Portsmouth Island and Core Banks for many years. Vehicles have been used on these islands to surf fish, and with good reason, since the late 1930s. The two islands provide 50 miles of the nation's most productive areas for surf fishing, and the NPS is proposing to take this area away from the surf fishermen.

Prohibiting the use of private vehicles will eliminate the surf fishing on these islands altogether. Fish move with the ever changing contour of the beach, and the locations where fish feed change from day to day and year to year. The private vehicle is a must for surf fishing, as it is needed to find the fish and to transport ice, bait, and fishing tackle to the ever changing fishing holes along the 50 miles of beach front. It is not uncommon to catch a hundred or more sea trout or two to three channel bass weighing over 30 pounds during a single fishing trip. Prohibiting the use of vehicles to the surf fishermen on these islands will restrict the sport to the very strong and the young, because they will be the only ones that will have the capacity to hike these remote areas. This will completely eliminate senior citizens and the handleapped from surf fishing on these islands.

RESPONSES

19

Superintendent

Sept. 5, 1980

The NPS plan to provide public transportation for surf fishermen borders on the ridiculous. The plan contends that you can move ice, bait, and fishing tackle over appreciable distances to the exact areas where there are fish on the beach. This is to say nothing about how to keep your fish from spoiling or how to transport the fish back from the beach area to the public transportation. As a senior citizen who have been surf fishing for some 40 years, I can tell you that this plan will at best allow you to wet your fishing line.

If you haven't already heard, you will hear the environmentalists, ecologists, protectionists, and others calling for a wilderness designation for these islands. We are part of an expanding and ever changing world. We are living in a society of rapidly advancing technology, and we won't be able to solve our environmental problems by going back to the horse-and-buggy approach. It is absurd to make wilderness of islands that can be destroyed by a single oil spill from a passing oil tanker or desolated by pollution from neighboring towns, rivers, factories, or developments. What we need today is a down-to-earth, practical approach that is in harmony with nature as well as our society. That approach is to leave the islands as they are.

The people who have lived on and near these islands for the last 200 years have done a fine job of keeping nature and our society in time with each other. Sure they have made some mistakes, but you'll not find a single group of islands anywhere along the Atlantic coast less polluted and as clean as these islands are today.

Now environmentalists and ecologists want to make these islands wilderness, so only the young and strong can use them. The NPS wants to start building comfort stations and boat docks and digging channels, so that development of these islands can begin. Why start this kind of development? Once it starts, it will never end until these islands are like any other commercialized seashore area. NJBBA votes to leave the islands as they are at the present time---with the support and help of the NPS to keep them that way.

Sincerely Yours,

G.R. Moreland Representative

New Jersey Beach Buggy Association

October 10, 1980

Mr. Russell E. Dickenson Director, National Park Service U. S. Dept. of the Interior Washington, DC 20240

Dear Mr. Dickenson:

The current efforts by the National Park Service to establish unexceptably strict rules governing use of the Cape Lookout National Seashore - three barrier islands on North Carolina's coast - would eliminate traditional uses of these islands by fishermen and others who must depend on transportation to cover the long shoreline.

The North Carolina Wildlife Federation considers this new effort to limit the use of these coastal beaches to hikers and a limited Park Service sponsored transportation system unappealing to our membership while designating most of the area as wilderness. We feel that the time has come to restrain the agencies of the U. S. Government from taking over state lands and regulating their use so that only a few citizens may fully enjoy the areas.

Obviously, public use of wilderness, where ever it is located, is limited to a small fraction of one percent of the taxpaying public; this is not fair treatment of the major source of funding for this effort.

The Cape Lookout National Seashore islands were purchased with the intent and resolve that they be used for the enjoyment of all citizens of the state and guests who come to North Carolina to enjoy this beautiful state.

The Draft General Management Plan and Wilderness Proposal of the National Park Service recommends closing 55 miles of beach to Off Road Vehicles (ORVs) and providing only 13 miles of public transportation! Obviously, surf fishermen, shell-gathers, and other dedicated users would be faced with as much as 110 miles of hiking if they wished to enjoy the banks to its fullest extent. The restriction on vehicle use as now presented would apply only to citizens interested in enjoying the strand of beach and not to Park Service Personnel on routine inspections and other trips. There are more satisfactory means of protecting - while the public enjoys - these valuable coastal islands.

RESPONSES

92 The plan as now written incorporates many of your suggestions.

202

age 2 Mr. Russell E. Dickenson October 10, 1980

May we point out that the Federal agencies now holding - or contemplating - title to long stretches of coastal beaches often use arrogant and inconsiderate authority in regulating use of these areas. Now, the Cape Lookout National Seashore management plan is bent on further restricting the availability and use of our coastal barrier islands. In reality this proposal would take away recreational opportunities and offer little mitigation for traditional users while favoring protectionists.

The North Carolina Wildlife Federation strongly supports the wilderness concept in principal for areas which meet existing criteria for wilderness. But, the program is out of hand and costing the taxpayers millions of dollars which could better be used to meet public needs for important programs of benefit to greater numbers of our citizens.

We feel, as do many others, that there is a more reasonable approach to management of the Cape Lookout National Seashore. No objection would be raised to a management plan that provided direct access from the sound side to the ocean beaches if it were assured. Several corridors should be provided across the land area at suitable points, with fixed limits applied, restricting vehicle use to such corridors. Inland, a wilderness designation then would be respected by 99 percent of the users. Obviously, any violations of this wilderness restriction would be easier to enforce due to an increasing recognition of environmental needs by ORV users and the public in general.

We know that you will use good judgement in considering these plans for our recreational future. The public will be the losers should the current Cape Lookout National Seashore plan be adopted.

Charles R. Shaw Executive Vice President

CRS/cca

CC: Cecil D. Andrus, Secretary of the Interior Robert L. Herbst, Assistant Secretary For Fish, Wildlife, and Parks James B. Hunt, Jr., Governor, State of North Carolina Jesse A. Helms, Senator, N. Carolina Robert B. Morgan, Senator, N. Carolina Walter B. Jones, Representative, N. Carolina L. H. Fountain, Representative, N. Carolina Charles Whitley, Representative, N. Carolina Ike F. Andrews, Representative, N. Carolina Stephen L. Neal, Representative, N. Carolina Richardson Preyer, Representative, N. Carolina Charles Rose, Representative, N. Carolina W. G. Hefner, Representative, N. Carolina James G. Martin, Representative, N. Carolina James T. Broyhill, Representative, N. Carolina Lamar Gudger, Representative, N. Carolina Superintendent, Cape Lookout National Seashore

T.G. Pearson Audubon Society P.O. Box 13316 Greensboro, North Carolina 27405. Telephone: (919) 294-1240.

September 15, 1980.

Cape Lookout National Seashore P.O. Box 690 Beaufort, North Carolina 28516.

Dear Sire:

The T. Gilbert Pearson chapter of Audubon Society would like to support the Mational Park Service proposal for management of the Cape Lookout area of the National Seashore.

Audubon members are especially concerned with the fate of the loggerhead 93 turtle and the colonial nesting birds of the outer banks. The use of private vehicles is particularly detrimental to these and other species that occupy this area. This fact has been demonstrated in the high intensity use areas of most of our coastal regions. Audubon thus supports the prohibition of private vehicles on the Core Banks, Shackleford Banks and wost of Portsmouth Island.

Thank you for the opportunity to express our opinions.

Sincerely.

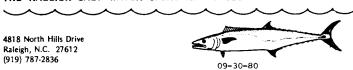
Thomas Duckwall, President T.G. Pearson Audubon Society

cc: Regional Director Southeast Region, National Park Service 75 Spring Street, SW Atlanta, Georgia 30303.

RESPONSES

93 The plan as now written calls for controlled vehicle use on Core Banks and Portsmouth Island. NPS believes that with safeguards in place--information and designated corridors, as needed--park resources such as vegetation, turtles, and nesting birds can be protected. See appendix B.

THE RALEIGH SALT WATER SPORTFISHING CLUB



Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, N.C. 28516

Dear Sir:

The Raleigh Salt Water Sportfishing Club, of Raleigh, N.C., would like to enter the following comments into the public record re the Draft Environmental Impact Statement on the General Management Plan/Wilderness Study/Developmental Concept Plan for Cape Lookout National Seashore. For informational purposes, the Raleigh Salt Water Sportfishing Club represents a wide diversity of salt water anglers from the Raleigh-Cary-Chapel Hill area of central North Carolina. The goals of the club encompass many facets of salt water angling, one of which is continued efforts to enhance the sport and the fishery in North Carolina for all salt water recreational fishermen.

The draft EMS has been carefully reviewed by this body. Alternatives 2, 3 and 4 are not acceptable for basically the same reasons as stated in the EMS. The following comments are directed only to Alternative 1, and are looked upon as realistic, feasible modifications to Alternative 1.

Historically, as supported by NPS user surveys, Core Banks has been primarily utilized by recreational fishermen, particularly during the spring and fall seasons. Complete restriction of private vehicle use on Core Banks, particularly from from Cape Lookout northward to New Drum Inlet, would be in direct contradiction to the historical use patterns. The on-island public transpotation system as proposed would be completely inadequate as well as overly restrictive to the movement of surf fishermen.

The Raleigh Salt Water Sportfishing Club suggests a feasible modification to Alternative 1 would be to allow properly licensed beach vehicles to have access to the beach from Cape Lookout north to New Drum Inlet. This access would be restricted to the two historically significant user periods of March through May and September through January. This would allow continued access to that portion of Core Banks historically showing the greatest useage by private vehicles. By allowing movement only within access corridors, environmental impact would be minimal. Danger to nesting sea turtles would not constitute a problem as the period of greatest activity by sea turtles would be during the nonuse summer period.

The proposed public transportation system would operate during the peak use periods, to include the summer season of June, July and August. The public transportation system would be of benefit to surf fishermen who do not own beach vehicles, or choose not to ferry them to the island, and are willing to fish with little freedom of movement on the beach. It would serve its greatest benefit to the recreational user during the summer months in transporting swimmers and sightseerers along the beach near the cape.

RESPONSES

94 The NPS now proposes that all of Core Banks/Portsmouth Island will remain open to vehicle use, under management control, and that on-island public transportation will continue at Cape Lookout Point.

P. 2;rgs

Justification for such modifications to Alternative 1 are as follows.

- Historically, beach vehicle useage has been greatest from New Drum Inlet south to Cape Lookout.
- Beach vehicles operated by fishermen are normally operated between the exisiting water line to that portion of the beach immediately above high tide (during that period of the tidal cycle), with preference for wet sand immediately above the wave wash.
- Beach vehicle traffic would be restricted to specific transportation corridors.
- 4. Restriction (preservation) of Portsmouth Island from the north side of New Drum Inlet to Portsmouth Village would give wilderness status to that portion of the barrier islands which most typifies the wilderness definition.

The savings (conservation) of energy concept as proposed as being a benefit of the public transportation system is negligible. Even if compared only to the amount of gasoline used by motor vehicles in the coastal counties of North Carolina, the gallons would be insignificant. Any additional fuel used by anglers traveling from interior states to the Core Banks for recreational fishing would be a minor portion of the total gallons used and overall expense of the trip.

We trust these comments will be given careful consideration. They are offered with the utmost sincerity from sportsmen who are aware of the coastal beauty of North Carolina; who are concerned with the careless and useless destruction of coastal habitats; and wish to provide an even better recreational fishery and coastal environment for future generations.

Sincerely,

Robert G. Stryker

Members' Signatures

President

RESPONSES

404



SIERRA CLUB & Joseph LeConte Chapter ... To explore, enjoy and preserve the nation's forests, waters, wildlife and wilderness ...

Piedmont Plateau Group P.O. Box 862 Greensboro, N.C. 27402

October 7, 1980

Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, North Carolina 28516

Dear Superintendent:

First of all we should realize how fortunate we are to be able to decide the future of Cape Lookout National Seashore. Most of our nation's barrier islands have been developed without any foresight and with little or no planning.

Cape Lookout comprises the longest stretch of 95 roadless and undeveloped oceanfront in North Carolina. The rest of North Carolina's Outer Banks to the north of Cape Lookout long ago succumbed to development when bridges and paved roads were built to accommodate automobiles. Cape Hatteras National Seashore not only has motor vehicle traffic on its highways but also on its beaches. This is why it is extremely important that we take the greatest care in keeping Cape Lookout's shoreline in its natural state.

A major factor in making this decision should be choosing the proposal that provides the greatest benefit to the largest number of people. This is a National Park, and it belongs to all Americans, not just an exclusive few. A comparison of the alternatives clearly shows that the Park Service proposal will provide better access to the seashore to a broader range of the American public.

The National Park Service has done an excellent job in formulating a proposal that would preserve the natural state of the shoreline while providing recreational opportunities for the widest range of activities. The public transportation line that the Park Service has proposed will serve not only fishermen but swimmers, picnicers, sightseers, beachcombers, surfers and hikers as well. A public transportation system is far better for the island and everyone that uses it when compared with the use of private motor vehicles. Public transportation will be much more energy efficient, cause less damage to the island's plant cover and wildlife, and will be much safer for the visitors to the island than allowing private vehicles to operate on the beach.

Because this fragile island chain is one of the few remaining areas free from most of man's influences the Sierra Club strongly supports the Park Service's proposal to main**RESPONSES**

95 The plan as now written does allow controlled vehicle use on Core Banks/Portsmouth Island. No vehicles will be allowed on Shackleford Banks. After consultation with agencies having expertise or jurisdiction by law, and reviewing all public comments, the NPS believes that the plan as now written will protect park natural and cultural resources while providing for a wide variety of visitor uses.





SIERRA CLUB & Joseph LeConte Chapter ... To explore, enjoy and preserve the nation's forests, waters, wildlife and wilderness ...

-2-

tain Cape Lookout in its natural state while providing an opportunity for all of the American public to enjoy the island's solitude in a non-destructive way.

Sincerely,

Alan P. Myrick Conservation Committee Piedmont Plateau Group



SIERRA CLUB & Joseph LeConte Chapter ... To explore, enjoy and preserve the nation's forests, waters, wildlife and wilderness...

Rt 5 Box 138 Greenville #6 2783h

Oct 11, 1980

Supt. Preston Riddell Cape Lookout Natl. Seashore Beugfort N.C.

Dear Mac,

The following should be entered into the hearing record on wilds mess and management proposals on the Seashore, as the p sition of the LeConte Chapter:

To accommnate the legitimate needs of sports fishermen who have long used Jone Banks, the following recommendations are made in the matter of private ORV access and use on Core Banks:

1. Private ONV will be permitted in the southern 13 mile stretch of the Bank which is designated for non-milderness category in the mark Service proposal;

2. Venicles will be restricted to the normal intertidal portion of the ocean beach, with controlled access across the island from the ferry;

3. Only shortterm vehicle permits will be insued; no annual permits and no storage of vehicles on the island:

h. The total number of permits in force at any one time will be limited and controlled by the lark Service as to conform to the carrying or acity of the Seashore in its primary, wilderness function;

5. Frivite vehicle traffic will be restricted to the cool months, when there is very little pedestrian traffic and fishing interest is preatest;

6. No major new construction of loading facilities for vehicular ferries will be permitted; existing small, shallowdraft vessels carrying one or two vehicles only should be used.

The above is a refinement of the position given by the chapter in the public hearings last month.

Sincerely,

Phil Adler Chair RESPONSES

 $96\,$ Your suggestions have been incorporated as appropriate in the plan as now written.



United Mobile Sportfishermen, Inc.

Conrad F. Smith, President 15 Bow Street Woburn, Mass. 01801 (617) 933 - 6847

Agnes E. Smith, Secretary 36 Hemlock Road Granby, Conn. 06035

Assateague Mobile Sporffishermen
Cape Hatteras Anglers
Delwaver Mobile Surffishermen
East End Anglers Club
Farragut Striper Club
Great South Beach Mobile Sporffishermen
Harbord Surf Club
Harriord Surf Club
Long Island Beach Buggy Association
Mobile Sporffishermen of Connecticut
Nags Head Fishing Club
North Carolina Beach Buggy Association
Mobile Sporffishermen of Connecticut
Nags Head Fishing Club
North Carolina Beach Buggy Association
New Jersey Beach Buggy Association

Superintendent Cape Locacut National Peashore P.O.Box 690 Beaufort, N.C., 26516

September 6.1980

ond Mobile Sportlishermen Statement at public hearing at Guilford College, Greensooro, N.C. on the National Park Service NPS) araft General Management Plan (GMP), Wilderness Study, Development Concept Plan and the Draft Environmental Impact Statement (DEIS) for Cape Lookout National Seashore (CLNS) aatea May 1980.

My name is William Miller.I represent the United Mobile Sportfishermen, an east coast association of fifteen member organizations from North Jarolina, to Massachusetts, representing some £0.000 people.Our members are surf fishermen who use an off-road vehicle for oversand travel along the beach for fishing access.

CLNS is an area where the mobile sportfisherman has traditionally mad access to cursue his recreation similarly the nunter. The act establishing the seashore manaatea that hunting and fishing shall be permitted. Not can or may be permitted, but shall be permitted. By recommending Portsmouth Island and part of Core Banks for Wilderness. 97 with the palance of Core Banks for Natural Lone classification.all without use of private oversand vehicles, the NPS does in fact propose ebimination of these recreational activities by virtue of the denial of practical access. As a surf fisherman of thirty years experience I can offer personal testimony of the necessity for the vehicle access to this shore. Without it. the recreational experience is requeed to one tenth of that which the vehicle provides. Without mobility, the surf fisherman is reduced to the equivalent of fishing in a bath tub. If this rlan is foist a upon us it will mean that the overwhelming majority of sportfishermen who presently fish these beaches will be for sea to search for another peach to fish because of this denial of access. By its own statistics. 40% of all visitors are fishermen and 75% of them fish with the use of a private vehicle. This means most of the fishermen, not merely "some" or "a few" as is stated in the DLIS. Therefore 30% of the visitors to CLAS will automatically be excluded from the seashore, a practical denial of their sport in clear violation of the CLMS ensoling legislation.

RESPONSES

97 The plan as now written allows controlled vehicle use on Core Banks and Portsmouth Island. Many of your comments have been incorporated in the plan and FEIS for Cape Lookout.

The LLIS is inadequate in its analysis of the proposal's impact on man's use of his human environment. It fails miserably to even identify the impact on the sportsman much less quantify it. because of outright misrepresentation of regutable scientific researon and other untrue statements, the documents present a conclusion that is not supported by the true facts. Detailed comment on these misrepresentations are appended as Enclosure (1). It is my personal belief that it was aetermined that the vehicle use must be ended and data was deliberately missepresented or distorted to cast the vehicle use in the most unfavorable light in order to support this predetermined decision. Both documents are sales documents intended to proselytize rather than to perform an honest analysis. Because of a defective conclusion, and also because the planners out in benver lack the professional competence to understand the essentials of tractical surf fishing, much less to effectively express a factual statement of the plan's impact on the aportfisherman, the DEIS is clearly deficient. The DEIS cavaliarly dismisses the elimination of the mobile sportfishermen's access to this shore as an "inconvenience" which clearly illustrates their lack of credentials to know of what they say.

and finally the DEIS makes no attempt to exclore mitigating measures that would alleviate the alleged vehicle offenses as is required by the Council on invironmental Quality TEPA regulations, which is a further indication of the predetermined decision to eliminate the use, rather than to perform an honest analysis. There are indeed mitigating measures which are listed in inclosure (1) for any of the minor affects of the vehicle use. The failure to consider them is conclusive evidence that there never was any intent at consider analysis, but rather an obvious intent to exagerate retty grievances for the purpose of supporting the termination decision. The DEIS is defective in this aspect and must be corrected.

It is stated that the accision for wilderness was decided by public response beginning at public workshops held in 1976 and that 75% of the responses to an invironmental assessment expressed a preference for elimination of private vehicle use. In examining the list of those involved in the so-called public involvement process it is found that the list of the private organizations involved in this process was almost exclusively environmental groups.

There is an old adage which says " when you lie down with dogs you come up with fleas. "The corollary of this would be when you go to ned with environmentalists you come up with wilderness. "It is high time that the NPS start talking to real people.

A wilderness would close down this seashore and degrade it to a private sanctuary for a very limited few. It would end forever any national significance that attaches to this beach so that there is no national justification for retaining it as a unit of the national park system. In this situation, the UNS would support disestablishment of the seashore and return it to the State of North Carolina, who we are certain could properly plan for it's proper use by the reorde of North Carolina. This seashore was created for the purpose of

Preventing future private development so that it would be administered as a national recreation area, not to lock it up and prevent legitimate public use. Since North Carolina turned their islands over to the federal government for "public park" purposes there is a real question as to whether wilderness can qualify as a public park. In my view it does not and may be the basis for restoration of title to the state.

It is claimed that those who provided the selected public input claim that venicles interfere with others reace and enjoyment and want this access ended. Then it is recognized that between hunting and fishing these are the two most popular activities on all but two months out of whole year then those who would insist that sportsmen relinquish this beach for their exclusive peace and enjoyment are demanding a greater imposition on the peace and enjoyment of the greater numbers of these sportsmen by demanding termination of their enjoyment. Therefore, considering that their enfoyment is merely alleged to be degraded by the vehicle presence. while their presence aemanas expulsion of the vehicle user their enjoyment thus would extract a higher secrifice of greater numbers. By reasonable standards, they should be required to bear this awful burden for the greater good or suffer exclusion themselves.

The so-called public transportation system is a sorry substitute for real mobility and could not possibly substitute for that of the vehicle. It seems the NPS has a fixstion about eliminating private vehicles from all their parks by providing their own transportation systems. This system on CLMS would provide access on only 1 of the presently accessible beach; would run on someone's office hours scheaule would not run on the night tides and would not provide any support for keeping up with a school of fish. This is just one more example of the sterile Denver planning mentality.

It is claimed that executive Orders 11644 and 11989 obligate elimination of venicle use. The orders require no such action. anclosure (1) puts the lie to this claim. It is also claimed that photographs show damage by vehicles. These photographs show an aesthetic complaint but no damage. This exageration as well as the misrepresentation and falsification of regutable scientific research are all discussed in Enclosure (1). They point to a completely aefective DAIS.

On the Subject of Wilderness, it is claimed that an opportunity presents itself to include a "representative sample" of the roadless snoreline in the National Vilgerness Preservation System. When it is realized that approximately 80% of the CLNS shore is rlanned for wilderness and the bulk of the balance in a quasi-wilderness category (a severely restrictive Natural Lone) this in not a representative sample, this is the entirety of the shore, and a gress mistatement.

The wilderness plan is also presented as being compatible with Carteret County's economic objectives of emphasis on tourist related activities. When wilderness will only attract the young and healthy backpacker type who does not stay in motels and spends very little money within the community, this claim is another falsification of the true facts. The wilderness will discourage further tourism and will further georess the regional economy. In addition there is no authorization in the Wilderness Act for creation of an artificial wilderness area of the removal of human impacts in order to create a wilderness. The motives of the Wilderness Act are to identify those unique and outstanding environments that presently exist, so that they may be saved for posterity; not to initiate Depression Era WPA type projects to recycle any and all impacted dung hears from a burned out South Bronx slum to a refuse strewn parrier island, all at the whim and fancy of some wild eyed land manager or planner.

The failure to properly aggress the greaging impacts while misre-resenting the No Action alternative is further evidence of the inadequacy of the DEIS. There is no serious analysis of the widespread effects of this activity both in the immediate area of areaging on benthic infauna, the estuarine ecosystem at large, or on the area selected for smoil disposal. There is no serious identification of the biota affected. There is not even a determination of where the spoil will be aisrosed merely it will be out somewhere including possibly the ocean beach where it is eminently not suitable for aisposal for many reasons. The KPS references

(e.g.:Buckley and Buckley,1976) among many other sources stress this fact.

while paying lip service to the mandate of Executive Order 11990 for pretection of wetlends, the plan proceeds to construct destructive and unnecessary interpretive boardwalks in wetlands at Harkers Island and to needlessly locate landing facilities in wetlands near Cape Lookout in clear violation of this directive.

The savaging of the most sensitive and precious ecosystems. the estuaring system of the sound and the further desecration of valuable wetlands exposes the NPS planners to deserved ridicule for their complete lack of understanding of genuine environmental values while aisplaying an inorainate concern for the lesser significant ecosystems on the island fastland surface. The shallow araft ferries presently used for transport are the superior mode of access both in terms of their least environmental impact and their avoidance of the excessive costs of initial dredging and the recurring cost of maintenance areaging. Interestingly enough, the MPS exageration of the minor effects of prop wash induced turoidity by these ferries (the so-called "kick-out") is not addressed concerning a similar and I must add minor affect that will continue to occur from private coats that will continue to be allowed to land anywhere. The prop wash consern from ferries and private craft is insignificant and "kick-out" is a red herting. The DEIS is weefully defective in analyzing these concerns and must be corrected.

Other comments on excessive costs of aevelopment, location of aevelopment in flooaplains on Harkers Island, excessive aevelopments on the barrier islands (especially maintenance facilities), choice and size of the Herkers Island property and facilities, the per capital visitor costs of the proposed alternative to the nation at-large are not discussed further due to lack of time for preparation of comment. All of the unvoiced concerns indicate poor judgement and further inadequacy of the DEIS and planning process. And must be corrected.

The United Mobile Sportfishermen vehemently opposes designation of Core Banks and Portsmouth Island for wilderness as being undualified by the standards established by the Wilderness act for the reasons previously noted.

There is no question but that private venicle access for mobile sportfishermen and commercial fishermen must be continued under a reasonable permit system to control the use with reasonable use regulations and equipment requirements. These regulations must be established with meaningfull input from user groups as required by E.O.11644. The JMS stands ready to assist in the formulation of these regulations. The vehicle use is necessary for fulfillment of the CLMS enabling legislation mandate which requires that fishing and hunting shall be permitted. Termination of this access will be opposed and is considered the basis for disestablishment of the national seasone.

RESPONSES

beach called Care Lookout National Seasnore.

Sincerely,

William E. Miller Chmn. Leg. Action Committee.

> 7 Sussex Lane Bethpage, N.Y., 11714

98 P.S. Future plans for Core Banks and Portsmouth Island should include continued availability of the fishing camps on a concession basis, with present operators as the concessionaires, so that this traditional use can be maintained.

W. Z.

Encl.

RESPONSES

98 The plan now includes perpetuation of two of the fishing camps on a concession basis. Existing cabins will be removed and new camping shelters will be built. A concession prospectus will be issued and competitive bids will be sought in accordance with approved procedures.

ENCLOSURE (1)

Comment on statements made in the GMP and DEIS concerning vehicle use

The most comprehensive statement of vehicle use impacts is listed in the GMP on pages 57 to 60. These statements are discussed below on an item by item basis. These impacts should have been listed in the DEIS rather than the GMP, and mitigating measure analyzed there. No mitigating measures are discussed anywhere in either document.

(GLP.pg £7&2) Executive Orders 11644 and 11989

It is claimed that Executive Orders (EO) 11644 and 11969 obligate elimination of venicle use when they adversely affect natural, aesthetic or scenic values.EO 11644 Section 3(a)(1) requires that Off kosa Vehicles (OEV) "Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. "The key word is "minimize", not elimination. The dictionary further defines "adverse" among other things as:sntagonistic, in hostile opposition to ones interest, calamitous, afflictive. The NPS preoccupation that not one place of grass shall be affected does not square with the EOS.A bias further is evident when the tolerance for damage by wilderness users will be accepted with mere relocation of the use to another location as the solution (GLP, pg67). The mobile sportfisherman expects equal treatment.

Section 9(a) of EO 11969 reads: "--- the respective agency nead shall whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil vegetation, wildlife habitat or cultural or historic resources--- of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such soverse effects, untill such time as he determines such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence."

There are no adverse effects, much less considerable adverse

There are no saverse effects, much less considerable saverse effects. Thus the claim that vehicle elimination is mandated is an outright lie.

(GMP, pg 57) Vegetation camage

It is claimed the photgraphs (shown on pages 34 and 32) show damage to vegetation from vehicle use, what the photos show is lack of vegetation in the vehicle track, which is at best a very subjective and minor aesthetic complaint, not an environmental one. I personally do not even consider what is shown in the photos to be an aesthetic impact. These "worst case" photographs show no evidence of blowout caused by aeolian arosion due to loss of vegetation in the track, thus the effect has no environmentatal consequence. The loss of vegetation in marshes due to vehicle or redestrian traffic is of significance. Therefore vehicle use in marshes should be ended for this and other reasons, and the TPS

RESPONSES

99 We appreciate the analysis and points of view you have expressed in this enclosure. is supported in ending any traffic there. The vehicle traffic in effect prunes the root system of the grasses, preventing them from colonizing the vehicle track. If the traffic is ended then the grass root system will re-invade the track and re-colonize the area. Thus there is no permanent or irreversible effect on the grass. The concern in this situation is for creation of blowouts which is not evident in any of the chotos and which can be halted by christmas trees placed in the blowout. planting of grass or other means. ke-routing of traffic to a new trail is then indicated. Route orientation with respect to prevailing wines will greatly requee possibility of blowout. (Goafrey. Leatherman and Buckley, 1976) Odaly enough, one of the NPS references (Buckley and Buckley, NPS Monograph Series #9-1976) shows a positive effect of venicle use on the beach because the venicle tracks catch wing plown sea cats seeds which then are buried by blown sand. They germinate and then produce long double lines of sea oats and Spartina patens, some of which may become quies. Sea oat seeds need to be buried and the vehicle provides the mechanism to do it. Neither the GMP or the DEIS mention this positive contribution on the Outer Banks.Deliberate censorship of a scientific report to reveal only the negative affects while failing to present the positive ones appears to be a common NPS practice. It exposes the DEIS to be a fraud and

The claim of less vegetative cover and species diversity is a fact of life on these frequently overwashed islands. It is due in large part to these processes as well as grazing and other of man's uses (wolan Goofrey and Ooum-American Scientist March-April 1973). This reduction of vegetation is not attributed to venicles (and with exception of the minor reduction in the vehicle track) is patently ridiculous on its face. This source lists other researchers who maintain that the islands have always been sparsely vegetated, thus the allegation that this condition is due to vehicle use is not supported by the facts and is in fact a fabrication

places the entire set of accuments under a cloud of suspicion.

(GMP.pg 58) Physical Terrain

It is stated that vehicles compact the sandbelow the surface which tend to form salt pannes that drain poorly. No negative affect is listed and no reference is cited, so the first reaction to this is it is of no significance. Salt pannes indicate tidal water and this condition is not created on the ocean beach, thus the statement must refer to tidal flats or salt marshes on the sound side of the island. Thus this statement is so vaguely written as to imply a prevalent condition over any and all parts of the island which is not true. It will only occur in the rear of the island and the only apparent concern is that pannes provide mosquito habitat (Godfrey, Leatherman, Buckley, 1976). As stated earlier, the JES supports elimination of venicle use in wetlands and tidal flats.

It is also declared that devegetated sand is susceptible to wine action. Loss of vegetation and resulting aeolian erosion by plowout was discussed under Veretation Damage above. This has not

RESPONSES

been shown to be a problem and there are solutions, therefore this claim is without basis for concern.

It is also claimed that devegetated sand is susceptible to water action. again no reference is cited so the claim may in fact be little more than unqualified opinion. Goafrey and Goafrey-1976 express a result of reduction of dune elevation by traffic which can result in channel for overwash when these trails lead directly from the sound to the ocean. The overwashed channel provides a route for water under velocity that increases the movement of sand through the channel and erodes the channel. The solution is therefore for trails to meander or proceed opliquely from sound to ocean which reduces velocity of overwash currents, maintenance of dune height can be sustained by stabilized dune crossings however the overwash geomorphology of Core Banks and Portsmouth Island is such that the natural zone of low, irregular cunes broken by overwash passes (Dolan, Goafrey, Odum, 1973) does not require this technique. This broken, irregular dunefield configuration is clearly evident in the lower photo on page 35 of the JLP as well as evidence of multiple overwash fans. Thus erosion by overwash, while a natural and necessary mechanism for barrier island retreat in the face of rising sea level (per Goofrey) need not result in channelized erosion if simple techniques are followed and need not be a cause of concern.

It is stated that "Research suggests vehicle use increases same movement but also reduces the grasslands which collect wind-blown sediment. This might cause future overwash to be unusually severe (Hosier and Eaton, 1975)". The statement indicates a very speculative conclusion rather than a statement of fact, thus they might just as easily not cause this effect. Effect of vehicles on vegetation and overwash erosion were discussed above.

(GMP, pg 58) Animals

Vehicle traffic is suspected of causing destruction to areas where colonial birds nest. This situation should not exist & not be allowed to exist. Where terns and other colonial birds are nesting, the areas should be roped off (or sand fenced) and signed to givert vehicles (and pedestrians) away. This simple technique (Bloagett 1976) will effectively correct the problem but is not suggested in either the LEIS or the GMP. It is again a demonstrated aeficiency in the DEIS. It is also claimed that birds fly up from their nests when vehicles pass at a distance. From personal experience at Gateway National Recreation area in New York City, I know this is not true. a roped off and signed area provides these birds the protection they need and they know it. This includes common and least terms as well as Black Skimmers. Bloogett's research and other references (Godfrey Leatherman Buckley-1978) shows that birds acclimate to vehicles passing very close to their nests and can come three times closer than peaestrians. Again this data is not presented in order to present the vehicle use in as unfavorable light as possible.

RESPONSES

Loss of Loggerhead Turtle hatchlings in vehicle tracks is also listed as a negative impact. Again no solution is listed, yet it is noted elsewhere that when turtle nests are encountered, the public transportation system will be detoured around them towards the sound. This same solution can be applied to private vehicles. Or a planked crossing flush with the sand will serve to eliminate tracks in the area, while using rope and signs to divert vehicles to the plank crossing. Additional clanking can be used to direct hatchlings from the nest to the plank crossing. This same plank fencing twohnique might also be effective in preventing the hatchlings from traveling down the beach are to disorientation from the lighthouse.

Marine animals are claimed to be affected by vehicles on the beach or tidal flats because diverse and large populations of organisms live beneath the sand surface in the intertidal zone according to a reference (Godfrey, Leatherman, Euckley-1978). An examination of the reference shows that they found very few organisms on the intertidal beach, thus concerning effects on the beach, the statement is an untruth. The reference discusses experimental tests on intertidal flats by wheeler which showed destruction of soft shell clams. The solution to this problem is to bar vehicle traffic on tidal flats and is supported as stated earlier.

Gnost Crao populations are significantly reduced according to another study (Steiner and Leatherman, 1979) which was done at assateague Island National Seashore and Chincoteague North the study implies a connection between vehicles and the low or zero populations on vehicle used beaches, while higher populations were found on the bathing beach and the rarely visited beach on the Chincoteague North an anomoly found by this study is that the bathing beach had higher populations than the remote North beach, which was attributed to found sorars left by bathers which encouraged colony growth. The study states that the crabs seemed to live in colonies, thus it would be possible that the sites studied by their sampling technique completely missed colonies on the vehicle beach but found them elsewhere. At any rate, if there is a genuine concern for crabs, the study results would indicate that they should be fed for improved reproductivity.

(GLTP.pg £9) Scenic Quality

The presence of vehicles and their tracks are claimed to alter the scenic quality of the seashore landscape. This claim is a very subjective complaint with attitudes varying from individual to individual. There are also those who cannot be happy except on a pristine strand devoid of any evidence of man even their fellow purists (Goafrey and Soafrey, 1979). There is simply not enough coastal zone to satisfy these people what precious little remains must be reserved for the maximum benefit of all. The scenic quality concern is essentially a matter of aesthetics and was further discussed under Vegetation damage.

(GEP.pg 69) Visitor Jse

The question of conflicts with, and safety of other users is discussed under this item.

The UKS Code of Ethics requires all vehicle operators to slow down to the lowest possible speed when approaching a passing pedestrian on the beach. Vehicle regulations to this effect are supported. Since there is no mention of any vehicle/redestrian indicants, the concern is considered hypothetical.

As the conflict issue relates to desires of the users to require elimination of the vehicle use, this matter was discussed in the general statement. The points are that except for July and August, hunting and fishing are the dominant uses. The majority of these users are vehicle users. Thus for a minority to require elimination of a major use is not reasonable, especially when it is recognized that for their inability to accept the annoyance (to them) of the presence of the other (vehicle) user, they would require him to completely sacrifice his recreation while the vehicle use does not result in a similar termination demand of these individual's recreation. The entire question of conflict resolution is a management problem that should be resolved on the basis of reasonable equity. The solution must be reasoned and fair to all. Certainly termination of vehicle use is neither reasoned or fair.

The claim that EO 11644 therefore supports the elimination of vehicle use because there are what are claimed to be adverse effects is not supported by the facts. The discussion of Executive Orders 11644 and 11869 above discussed adverse effects,—there are none! Concerning conflicts with other users. Do 11644 Section 3(a) states in part that areas and trails of vehicle use shall be based on "--- minimization of conflicts among the various uses of these lands." Thus conflicts shall be minimized, they do not necessarily have to be eliminated. The minimization of conflicts will usually mean that one user group will be inconvenienced or completely denied access. The EO does not specify that the user group to suffer will be the vehicle user. This accision should be resolved in favor of the majority user, with mitigating consideration for relevance of the uses involved to the park natural resources and mission.

There is reference made to extensive research at CLMS (Godfrey and Godfrey, 1976) It is alleged that this research shows that these islands are in an impacted state caused by vehicle use, hat these researchers say is that vehicles have been abandoned on the islands; vehicle trails can channel overwash (discussed under Physical Terrain above) and uncontrolled vehicle use on dunes will destroy regetation and lead to increased dune migration; affect nesting and feeding shoredras and gnost crabs and mole crabs. Judger Management suggestions, these researchers have this to say concerning OFVs: "Off-road vehicles are ofter damaging to parrier islands ecosystems and their use should be closely supervised on the islands. There should be requirements that all vehicles taken out to the islands must be returned." "all vehicles twolic or private, should be

RESPONSES

6

strictly limited as to where they may be ariven and should be prohibited from bird rookeries and feeding areas as well as beach vegetation."

It should be noted that these researchers do not claim that CLKS is in an impacted state as alleged, thus the claim is a misrepresentation of this research. They say ORVs are often damaging to barrier islands, implying that there is a potential if not controlled. Their management suggestions appear reasonable, can be supported and will prevent the islands from being "impacted". Impacts they list are generally covered under earlier comments. While it is true that overwash processes will erase much of the evidence of man's use, to this extent these effects are in fact reversible and thus to deny the use would serve no practical purpose.

RESPONSES

<u>\</u>



VACATION CLUBS INTERNATIONAL LTD.

Apartado Postal 105, Cancun, Quintana Roo, Mexico

September 15, 1980

Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, NC 28516

Dear Mr. Superintendent,

I have just received word that Cape Lookout may be designated a Wilderness Area, and that access to the Seashore by beach vehicles is to be prohibited. Preserving Cape Lookout for future generations is laudatory. But to indiscriminately prohibit use of beach vehicles is to prohibit use of the beach, and the indiscriminate prohibition of use of the Cape Lookout National Seashore is not in the best interest of the general public or in keeping with the intent of the Wilderness Act. I would like to lodge my official protest.

As a long-time surf fisherman and member of the New Jersey Beach Buggy Association, Pennsylvania Fish and Game Protective Association, Association of Surf Angling Clubs, and the International Game Fish Association, I'm well aware of the problems caused by <u>unregulated</u> use of off-road vehicles, but to ban their use altogether where they are the only form of transportation would be as illogical as banning busses in Washington DC because they pollute the air, or banning boats on the Mississippi because they pollute the water. It is much better to allow regulateduse of beach vehicles, and to enforce the regulations.

Instead of denying use of one of the few unspoiled surfs remaining on the East Coast, I encourage you to allow organized associations to use this area, and help you control the use. The New Jersey Beach Buggy Association, and many other clubs like it, work hard to protect the natural habitat and environment we all enjoy so much. They hold dune plantings and beach cleanups, erect dune-preserving snow fence, and in many ways contribute to ecologically better seashores. They use their beach driving privileges sensibly and protect their environment. They even have courtesy patrolmen who help reduce violations of beach privileges and educate the public. I suggest you issue permits to such associations and their members rather than seal off the beach altogether. You will find that controlled use by such knowledgeable and civic-minded organizations as the New Jersey Beach Buggy Association will work toward everyone's advantage.

Sincerely yours,

Norm Carpenter

Director

RESPONSES

100 Vehicle use will be allowed at Cape Lookout National Seashore on a controlled basis to protect park resources. Core Banks and Portsmouth Island will be open to vehicle use.

September 5, 1980

Mr. Preston D. Riddel, Supt. Cape Lookout National Seashore P. O. Box 960 Beaufort, NC 28516

Dear Sir:

55

This letter is in regard to the National Park Services planned proposals that would affect the Off-Road Vehicle (Orv) Surf Fisherman on Portsmouth Island and Core Banks, i.e., the Cape Lookout National Seashore.

As a representative of a large group of taxpayers who therefore are part owners of the seashore and also are Orv surf fishermen, I must object to the closing of 58 miles of prime surf fishing ground. In closing of 58 miles of beach to Orv traffic you are only going to put more pressure on the remaining few miles left on the East Coast. This added pressure to these communities and the distance the fishermen will have to travel to get to these areas is not fair.

We feel there should be management in the seashore, which there is a fine example of now, but we do not feel a complete closure is warranted or justified.

In closing I would like to express a firm stand against any changes in the management practices of the Cape Lookout National Seashore.

Furthermore in any future considerations to change policy affecting this region we feel that consulting an organization that represents the highest usage group, in this instance the North Carolina Beach Buggy Association, Inc., would have been appropriate.

Sincerely,

John J. Schutte, Jr.

President

cc: N.C. Beach Buggy Association, Inc. Va. Wildlife Federation N.C. Wildlife Federation **RESPONSES**

101 The plan as now written allows regulated vehicle use at Core Banks and Portsmouth Island.

R. D. DARDEN, JR. ATTORNEY AT LAW SUITE 101 - 710 ARENDELL ST. MOREHEAD CITY, N. C. 28887

EDITH WHITLEY PIERCE ASSOCIATE

TELEPHONE (919) 726-2134

October 28, 1980

National Park Service Beaufort North Carolina 28516

ATTENTION: Mr. Preston Riddle

re: Use of vehicles on Cape Lookout National Seashore

Dear Mack:

I am writing you on behalf of certain clients that I had represented at the time they released their property rights at Cape Lookout, in exchange for which they were given long term leases on the property which they occupied at the Cape. These are, in general, the persons who occupy houses situated between the lighthouse and the Coast Guard Station.

My clients are very much concerned about a prospective ban on the use of motor vehicles on the Cape Lookout National Seashore. The right to continue to use their vehicles was a important part of the consideration for the release of their property rights and the acceptance of the leases in return. As you know, the leases require them to maintain their property, and it would become a substantial impossibility for them to do so if they cannot use vehicles to transport materials, equipment and supplies from the landing to the buildings.

My clients are aware of and in sympathy with the need to regulate vehicle use so that damage to the topography and vegetation at the Cape does not result. However, they feel that the right to use their vehicles was a part of the consideration for the release of their property interest at Cape Lookout.

I would appreciate a note from you or from someone in the Park Service indicating the state of the current plans with respect, not to the use of motor vehicles generally at the Cape, but

102 This concern has been resolved now that the plan proposes private vehicle use to continue under regulation on Core Banks/Portsmouth Island.

National Park Service October 28, 1980 Page 2

specifically with respect to the conerns of those persons who are occupying dwellings at the Cape under long term lease arrangements.

Thank you very much.

Sincerely yours,

R. D. Darden, Jr.

RDD/kcc

cc: Dr. Ben Dawsey Mr. Warren Davis

Mr. & Mrs. A . H. James, Jr.

October 10, 1380

Superintendent Cape Lookout National Seashore Beaufort, N.C. 28516.

Dear Sir:

In 1951, my brother (Harry T. Davis) and I bought a 300 acre tract of land on Core Banks. In 1961 we sold this tract to the State of North Carolina for inclusion in a planned state park. At the same time my brother sold over 2000 acres to the State for the same purpose.

In 1954, I visited Core Banks for the first time and was amazed at the lack of vegetation, grasses, and sand dunes. At that time there were a large number of semi-wild cattle and horses that were free to roam from Drum Inlet to Cape Lookout. This explained the denused landscape. The operator of the camp where we stayed had built a fence around his cabins and planted grass which was flourishing. The contrast between the inside area and outside was startling.

In the late 1950s all of the free-roaming livestock were removed from Core Banks in accordance with a recently enacted state law. When I next visited the Banks in 1965 the amount of vegetation that had sprung up was astounding -- sand dunes were beginning to appear again. However, it was about this time that ther was a large influz of "beach buggies" to the Banks. Consequently, all of the beneficial effects from the removal of the livestock were neutralized wherever the buggies were operated. And they were operated indiscriminately over wide areas.

To amend the proposed wilderness plan to permit privately owned beach buggies would be a serious mistake. I suggest that those who are pushing for the amendment is a small group who are interested only in their selfish short term pleasures, with no concern for the long term preservation of the ecosystems on the Banks. The wilderness plan should not be amended. If anything, it should be expanded if these fragile islands are ever to become stable enough to again withstand the onslaughts of man and the storms.

Yours truly,

is, Rear Admiral, U.S.N. Retired.

RESPONSES

103 Thank you for the insight you have provided.

Cape Lookout Lift Shop Sept 17/80 Harken Bland

Hearshi:

104 I have look over each proposal

for the Mational Seasler and for myself

and for my kusiness I proposal No 2

I understand there would be only one road

to the park on the back side of the Island

End would cut off all of the people coming is down the road my shop and alst of other

places are on - What are you trying to do rum everyone out & husiness? Why can't there he hoth roads to help the people on the Island.

Sincewhy Mrs Stacy M. Vains

RESPONSES

10.4 It was our understanding that the villagers were concerned that their community life would be disrupted by increasing traffic along the narrow, winding SR 1335, which would also create a safety hazard for motorists and pedestrians. Therefore, we have suggested the possibility of the wider and straighter roads along the back side of the island being connected and opened up to through traffic. It is our assumption that the State Highway Department will hold public hearings before this improvement is made.

105

DEAR NR. RIBBLE, I AM WRITING CONCERNING THE PARK SERVICE'S CONSIDERATION OF FUTURE DEVEL-DEMENT OF THE CAPE LOOKOUT NATIONAL SERGHORE. I AM IN FAVOR OF THE MANAGE-MENT ALTERNATIVE I WISH SNACKLEFORD. BANKS AND PORTSMOUTH SSLAND BEING DESIGNATED WILDERNESS. THIS IS A VALHABLE OPPORTUNITY FOR THE DIPARTMENT OF THE INTERIOR TO PRESERVE A BARRIER ISCAND SYSTEM IN ITS NATHEAL STATE, AND I APPLANDE YOUR EFFORTS TO DO SO. HOW-EVER, I ANDERSTAND THAT THE "MOTOR FISHERMEN" ARE OBJECTING TO YOUR PLAN, IF THEIR WISHES ARE HONORED, LAPE LOOK-ONT WILL PROBABLY GROW TO RESEMBLE CAPE HATTERAS NATIONAL SEASHORE. WHILE IT WOULD NOT BE BAD IN ITSELF TO HAVE TWO CAPE BATTERASES, IT WOULD BE TRAGIC TO LOSE OUR ONLY CAPE LOOKOUT.

> THANK YOR AND GOOD LUCK DON A. DOWNS

RESPONSES

105 Given the difference in situations, there is little chance that Cape Lookout National Seashore will ever resemble Cape Hatteras National Seashore. The logistics of getting to Cape Lookout would be enough to obviate any possibility of becoming anything resembling Cape Hatteras. The NPS intent in the foreseeable future is to manage Cape Lookout as a low-density, dispersed use recreation resource.

The plan as now written allows regulated vehicle use on Core Banks and Portsmouth Island. The controls NPS intends to institute are believed reasonable to protect the scenic, natural, and cultural resources of the seashore while providing for a variety of appropriate visitor uses.

Department of Botany University of Massachusents

October 8, 1980

Amherst, MA 01003

Mr. Preston Riddel Superintendent Cape Lookout National Seashore Box 690 Beaufort, N.C. 28516

Dear Mr. Riddel:

106

I wish to congratulate you and the National Park Service planning team on the latest master plan for Cape Lookout National Seashore. The plan incorporates much that is known about the Natural history of these islands, and indicates a real sensitivity on the part of the National Park Service with regard to managing the barrier islands in harmony with the dictates of the environment. It shows a commendable attempt to make the islands available to the public, while retaining their outstanding natural characteristics.

I support the attempt to control off-road vehicle use on the islands even though I too have often enjoyed riding the beach. I wish to express my support for the plan as a whole and my agreement with the N.P.S.'s preferred options of wilderness status for most of the Seashore, including a ban on private vehicles. There are a few points I wish to make regarding some specifics of the plan, and I have attached those thoughts separately. Thank you for the opportunity to comment.

Sincerely yours,

Paul J. Godfrey, Ph.(

RESPONSES

106 No response necessary.

822

109

COMMENTS

COMMENTS ON THE CAPE LOOKOUT NATIONAL SEASHORE MASTER PLAN
Paul J. Godfrey
University of Massachusetts, Amherst

1. The Drum Inlet Area (old and new sites)

These outstanding areas of the Seashore have been largely left out of the plan from both the recreational and interpretive standpoints. The present Drum Inlet is one of the best fishing points in the Seashore, and has been a very popular vehicle and boat access site. The old Drum Inlet area is an excellent interpretive resource, where the whole story of inlet dynamics can be told, since patterns of inlet opening, closure, and succession are readily apparent. It is an area which should be made available for such use.

Both old and new Drum Inlet are excellent places for observing wildlife, particularly shore birds. These congregate here to feed on the booad flats of old Drum, and in the open waters behind new Drum. If excessive human disturbance, particularly during the nesting season, can be prevented, the area has great potential for public enjoyment.

Therefore, I suggest that the plan include access from the town of Atlantic, via private boats and NPS ferry, to Drum Inlet. In might be appropriate to include a ranger station at Atlantic and minimal facilities on Core Banks (perhaps at Don Morris's camp). I can see no reason why some access should not be provided to northern fore Banks, since human impactscan be readily controlled.

2. Freshwater lens.

The discussion of the ground water (freshwater lens) is not realistic and needs further work. The freshwater lens is found under the whole barrier islandfrom beach to marsh edge - except within the intertidal zone. In our many tests we have found fresh water (0 ppt) across all of Core Banks wherever we have dug in the dune zone or barrier flats. This water is potable and unpolluted because it is derived entirely from rain. It can only be polluted from local sources, and this pollution does not spread particularly far. The standard relationship for calculating the volume of the freshwater lens is the Ghyben-Herzberg formula: for every foot the top of the water table rises above mean sea level, the freshwater extends 40 feet below. The freshwater is essentially "floating" on top of sea water in the sands of the barrier island. The lens is a large and very useful supply of fresh water, a fact that should be made known to the public. Shallow wells can be placed in appropriate areas as sources of water for the visitors. Indeed, this source has been used for generations of barrier island residents; NPS credibility would seem to be diminished by claims that the water is not fit to drink. The occasional overwashes do not severely affect the freshwater lens as long as adequate precipitation is available.

3. Protection from severe weather, and other problems.

The plan does not adequately address the problem of the impact of severe weather on the visiting public. If large numbers of people are going to visit the islands, then some form of shelter will be needed in strategic places so that people can escape from the heavy rain and lightning that frequently occur.

RESPONSES

107 We appreciate your suggestions, most of which are incorporated in the plan as now written.

We are aware of the possibility of the presence of the freshwater lens, but we cannot endorse it as a dependable source of potable water at all locations "from beach to marsh edge." The water presently available in the fish camps is not potable; visitors provide their own drinking water. NPS is exploring ways of providing potable water on the islands.

The health and safety of visitors is the prime concern of all National Park Service managers. Prior to a storm emergency, visitors will be evacuated. A storm evacuation plan has been prepared by the park to protect the visiting public from potential hazards associated with coastal storms and related flooding.

The park's information/orientation effort will identify to visitors the need to prepare for biting and stinging insects.

The park will patrol the islands on a regular basis to ensure visitor safety and to facilitate emergency evacuation as needed. These are reasons supporting the developments called for in the plan.

This is especially a problem in midsummer, when very powerful thunderstorms develop along the coast. There should also be included .some discussion about insects and how to deal with them. It must be made clear to visitors that insects can be a frightful experience if the conditions are just right - in particular, camping on the beach in summer can be miserable thanks to sand gnats and mosquitos.

What kind of protection will be available for people during winter storms, on in case of a boat wreck or other accidents? Will the wilderness portions of the Seashore be patrolled during the whole year? What will happen if someone is in severe trouble somewhere on the beach? We have made at least one rescue on Core Banks, in February, purely by chance: while driving down the beach after some field work, we spotted a wrecked aircraft and a nearly dead pilot and brought the individual to the Coast Guard Station. If all vehicles are to be banned, it is quite possible that a person could die on the Banks following an accident if no help is readily available. In the past people have depended on the old shacks for emergency shelter, and on passing fishermen in vehicles for rescue. Will the NPS provide some service along these lines? Or will people be warned that they will be on their own in case of trouble?

4. Erosion control

The exception

The eastern end of Harker's Island is eroding quite rapidly, and this is the region to be developed by the NPS as the main Seashore headquarters. What erosion control, if any, will be used to slow this erosion? Unlike erosion problems on the Outer Banks, erosion of Harker's Island is a permanent loss, and the NPS site will continously decrease in size. The plan does not consider this eventuality nor does it suggest how to control the problem when it becomes necessary.

RESPONSES

110 We know about the erosion along the east shore of the administrative site on Harkers island. At the comprehensive design stage, which follows approval of the GMP, this matter is expected to be resolved. September 18, 1980

Mr. Preston D. Riddel, Supt. Cape Lookout National Seashore P. O. Box 690 Beaufort, N. C. 28516

Dear Mr. Riddel:

This letter is written in reference to the proposed closing of the Cape Lookout National Seashore Park.

As a surf-fishing enthuisist and owner of an off-road vehicle, I am opposed to all four alternative plans submitted by the Department of Interior National Park Service.

For years I have taken advantage of the public lands available to me on the East Coast. And, have witnessed far more damage and mistreatment to the dunes and beaches by foot paths and litter from occasional visitors, than responsible ORV owners. The idea of any public transportation system, as in the afore mentioned plans, I feel would be disastrous.

Some of the originations contacted to participate in the development of these plans (example: The Sierre Club, Friends of the Earth - 3,000 miles away in Calif., etc.) do not have the first hand knowledge of Cape Lookout National Seashore Park to offer valid suggestions, that may jeopardize the use of this area to me or others as well. In the list of groups contacted, there is not one ORV origination, surf-fishing group or local business listed for their ideas or input into these plans. It seems the people most affected by these proposals were ignored and I see this as an unfair and irresponsible act.

I agree there must be management of public lands. But, why close the door on responsible people that bring revenue to localities that depend upon and thrive from their very presence.

111 P.L. 93-477 (October 26, 1974) directed NPS to prepare a general management plant for Cape Lookout National Seashore. In the course of its work, NPS sought the views of the public at workshops and through comment on preliminary planning documents. To these, there was little response from the groups you listed, leading us to believe that they agreed with the direction we were taking.

The one thing, I have found, that the majority of all land management proposals have in common is to create total wilderness areas. Therefore, denying access to ORV owners first and eventually the rest of the tax paying public.

Yours truly,

MEMBER OF:

Southside Virginia Four Wheel Drive Club Virginia Four Wheel Drive Association National Wildlife Federation Virginia Wildlife Federation North Carolina Beach Buggy Association North Carolina Wildlife Federation

cc:

Mr. Neal G. Guse Acting Regional Director Southeast Region National Park Service 75 Spring Street, S. W. Atlanta, Ga. 30303

RESPONSES

Superintendent

Cape Lookout National Park

112

Surf fishermen do not destroy: the beaches, sand dunes, vegetation, fresh water supplies, salt water supplies, land animals, breeding fish or fry, many grown fish, area people who cater to surf fishermen, lighthouses, or salt marshes (tidewater areas) & brackish water lakes (semi salt).

Below is further explanation of the above mentioned:

The beaches are being destroyed by the very people that profess to preserve them. Mostly the river dams (soil erosion) which keeps sand from the mainland from replenishing the oceans beaches.

Sand dunes will build around an old tire, beer can or anything that will allow sand to fall on its sheltered side during a high wind.

Vegetation will build sand dunes and stabilize sand above the high tide mark. Against the seas, sand dunes & vegetation always lose.

Fishermen usually carry their own fresh water. Toilets would also be carried if asked by the park service to do so. Try to get hikers and spectators to do this. This would only be practical if allowed to use 4-wheel drive vehicles.

Salt water pollution by fishermen would not amount to one ten billionth of what occurs from the mainland.

Rabbits are probably the last animals to disappear from the Core Banks. There are still rats and three species of snakes. Raccoon & pheasant have been stocked there but they will starve or die of thirst. There is no fresh water available to animals on the Core Banks.

Fish do not spawn where surf fishermen fish.

Not enough grown fish are caught by surf fishermen to harm the adult fish population or spawning stocks.

RESPONSES

112 No response necessary.

233

COMMENTS

Area people who cater to the Banks are destroyed by the lack of fish and shellfish. As of this date there is an oil spill about $1\frac{1}{2}$ mile south of Drum Inlet approximately $\frac{1}{2}$ mile wide and 8-10 inches deep (ie sand & oil). This was not leaked from a surf fisherman's vehicle.

Cape Hatteras & Cape Lookout lighthouses are being abandoned and left to the seas. This is a national disgrace and cannot be blamed on any one group of people.

Marshes & brackish water are the "primordial ooze" from which some believe all life came, are the most prone to pollution from land & sea and by definition are not surf fishing areas.

People who have never set foot on the Banks have stated that the sound of motor vehicles would disturb the tranquility of this area. Should they have been there they would know that the wind & surf are all that one can hear. Others who would like to hike or camp overnight are showing their lack of knowledge. It takes two hours round trip by boat, another hour to prepare for whatever activity you desire. The earliest boat over is 6 o'clock a.m. the last one back is 4 o'clock p.m. To insure not being stranded overnight one should not walk more that one hour away from the boat dock. The boats will not come over at night unless it is clear and calm (not often).

Please do not close the Banks to 4-wheel drive vehicles. These vehicles are necessary to protect the lives and property of all who wish to enjoy the Outer Banks of North Carolina.

Thank you for your time and consideration.

Respectfully;

W. K. Hope

W. K. Hope 523 W. 4th Ave. Gastonia, N.C. 28052

cc: Honorable James Broyhill
The Gastonia Gazette

University of North Carolina

9 October 1980

DEPARTMENT OF BIOLOGY

MARINE SCIENCE BUILDING 241

Mr. Preston Riddel, Superintendent Cape Lookout National Seashore Beaufort, North Carolina

Dear Mr. Riddel:

I would like to take this opportunity to indicate my support for Alternative No. 1 presented in the Draft Environmental Impact Statement (May 1980),

Present vehicle use on the island has resulted in severe impacts on the beach/berm environment. Vehicles presently use a network of sand roadways which tend to lower the survivability of dunes dominated by sea oats (Uniola paniculata) and cause instability in relatively flat areas of the berm.

Based on my research and general knowledge of Core Banks, the poor dune structure existing on the island has been maintained by off-road vehicle use. Historically, the island was flattened by severe hurricanes in 1954 and 1955 and the winter storm in 1962. The storm damage was aggravated by denudation of the vegetation by horses present on the island prior to the storm era.

Following these severe events, the island has shown very little dune recovery because off-road vehicles impact the coarse, sandy berm preventing the establishment of new dune systems. Seedlings of establishing sea oats are destroyed before they attain any size.

In my opinion, Alternative No. 1 provides the greatest security that the beach/berm system on Core Banks will recover and develop an extensive and protective dune along the entire island.

Thank you for the opportunity to comment on the proposed alternatives for the future of Cape Lookout National Seashore.

PAUL E. HOSIER

Associate Professor

PEH:rep

The University of North Carolina at Wilmington is a constituent institution of THE UNIVERSITY OF NORTH CAROLINA - William C. Friday, President RESPONSES

113 Thank you for the insight of your professional research regarding the possible adverse effect of ORVs on the establishment of new dune systems as well as the survivability of even those dunes dominated by sea oats. It is expected that by confining vehicles to corridors at Cape Lookout these problems will be alleviated and the islands' dune resources protected.

Superintendent

Beaufort, N.C. 28516

P.O.Box 690

Cape Lookout National Seashore

Having studied the new Draft/Wilderness Study and the General Management Plan for the Cape Lookout National Seashore in North Carolina, I am dismayed that the National Park Service and The United States Department of the Interior still do not understand why the National Seashores were created.

The intent was to preserve the Barrier Beaches and their traditional uses as they were at that time.

Both the National Park Service and the Department of the Interior seem intent on doing anything but that. Not only at Cape Lookout, but every Seashore under their jurisdiction.

Almost every management plan proposed by the National Seashore calls for constructing massive service facilities and promoting heavy usage of a nontraditional type, While Wilderness proposals try to remove all traces of man and eliminate all usage. Neither concept is in keeping with the intent of the

Seashores creation or correct for todays conditions.

The proposal for public transportation on the beach will require either massive government subsidies or prohibitive fares or both. This is just not practical in todays economy.

I remain opposed to any plan other than alternative number 2 (No Action). The island from the point of Cape Lookout to Ocracoke Inlet should remain open to beach vehicles.

Rigid enforcement of existing regulations with even harsher punishment for violators is necessary as almost all usage related damage to the Barrier Beach has been caused by the illegal practices of a few irresponsible persons.

Very Sincerely Yours

George H. Hulse P.O.Box 271

Centereach, N.Y.11720

Copy to:

US Senator Robert Morgan US Senator Jesse Helms US Congressman William Carney Outer Banks Preservation Assoc. United Mobile Sportfishermen, Inc. North Carolina Beach Buggy Assoc. Cape Hatteras Anglers Club Nags Head Fishing Club

RESPONSES

114 Thank you.

September 8, 1980

Superintendent Cape Lookout National Seashore P. 0. Box 690 Beaufort, North Carolina 28516

Dear Sir:

I appreciate the opportunity to provide comments on the draft (May 1980) General Management Plan, Development Concept Plan and Wilderness Study, and the associated draft (May 1980) Environmental Impact Statement for the Cape Lookout National Seashore.

I am a Florida resident and a retired Federal civil servant who has enjoyed the privilege of surf fishing on Portsmouth Island, N. C., between Drum Inlet and Ocracoke Inlet for the past 24 years, spending from two to three weeks there each year. I, therefore, feel qualified to address the subject plan and associated environmental Impact Statement. As a result of a comprehensive review of these documents, I strongly recommend that the NPS sponsored plan, Alternative I, not be adopted and that in lieu thereof Alternative II be adopted since it is in compliance with the intent of the enabling legislation, Public Law 89-366, and best serves the needs and interests of the public, including accommodation for disabled and senior citizens.

Essentially, Alternative II would be the least expensive since it would require no action. Present administrative and maintenance functions at Harkers Island would be continued. In addition, ferryboats to five landing points, on-island transportation at Cape Lookout Point only, would be continued, some cabins in the old fishing camps would be retained and use of private vehicles on the islands would continue. Ninety-eight percent of the Cape Lookout National Seashore would become a "natural zone" and no land would be classified as "wilderness".

The enclosed comments are submitted for your consideration on the proposed draft General Management Plan (Alternative I), Development Concept Plan and Wilderness Study and the associated Environmental Impact Statement.

Sircerely yours

1712 Needlewood Lane Orlando, Florida 32808

Enclosures

RESPONSES

115 No response necessary.

The proposed plan (Alternative I)

Fails to Comply with the Intent of the Enabling Legislation,
P. L. 89-366. This law authorized the establishment of the Cape
Lookout National Seashore, stating in part, "to preserve for
public use and enjoyment an area in the state of North Carolina
possessing outstanding natural and recreational values".

Section 4 of P. L. 89-366 further expands on the Congressional intent by specifically stating "The Secretary shall permit hunting and fishing, including shell fishing on lands, marshlands and waters under his jurisdiction within the Cape Lookout National Seashore in accordance with the laws of the State of Forth Carolina and the United States...".

Congress obviously established the National Seashore for the public use and enjoyment of its recreational values and further specifically directed that the Secretary of the Interior shall permit hunting and fishing thereon.

By eliminating overnight accommodations and off-the-road vehicles, such public use and enjoyment, rather than being preserved, will be diminished or all but eliminated on a great portion of the seashore, particularly the banks north of Drum Inlet.

- * Discriminates Unfairly Against Disabled People and Senior Citizens. These people in effect will be banned from surf fishing on most of the banks since off-the-road vehicles will not be allowed. If they are physically able and willing to ride the "cattle car" at Cape Lookout, they must accept the risk of being exposed and/or marooned without shelter if an unexpected storm or squall occurs.
- Discriminates Unfairly Against Surf Fishermen of All Ages by Banning Off-the-Road Vehicles.

About 30 miles of some of the finest surf fishing grounds in the world will in effect be closed to surf fishing by banning off-the-road vehicles and overnight accommodations at the existing fish camps. The argument that access by boat will be permitted for surf fishing holds little water. Other than at the New Drum Inlet and Ocracoke Inlet areas, access by private boat is simply impractical. The logistics of landing on the sound side, transporting cooler, ice, food, drink, bait and surf fishing gear to the beach is staggering, not to mention the return trip, especially if one has made a nice catch.

This is further compounded by the "pot luck" aspect. After the tremendous effort exerted in reaching the beach from the sound, the prospective surf fishermen may draw a blank in terms of a decent fishing spot (no slough, hole, drop off or rip). I suggest an expedition by National Park Service, preferably by

RESPONSES

116 Your thoughts regarding the effect of the proposed plan (Alternative 1) are appreciated, and many of your comments are incorporated in the plan as now written.

authors of the plan espoused in Alternative I, be formed to prove or disprove the above statement as to the practicability of access by boat for purposes of surf fishing. Of course a few disabled persons and senior citizens should also be added to the expedition to check out the NPS claims. A plentiful supply of shear pins is also suggested for the boat.

Makes No Attempt to Accommodate the Historical Primary Use of These Banks as Surf Fishing Areas, Particularly the Area North of New Drum Inlet.

This area is called "Portsmouth Island" in the report, extending to Ocracoke Inlet. The island has historically been divided more often than not by Swash Inlet. As late as May 1980, Swash Inlet had reopened, being impassable at high tide to off-the-road vehicles. It appears that at least part of the seashore could and should be designated for offthe-road vehicle use and thus accommodate both ends of the spectrum. An example where this is done is Assateague Island. Perhaps your planners should seek such accommodation to balance the apparent rabid desire to eliminate off-the-road vehicles and overnight accommodations. no matter how flimsy the rationale.

Proposes Unnecessary Expenditures of Large Amounts of Public Funds, Which Would Neither Serve a Useful Purpose nor Provide Return on Investment. The taxpaying public would in effect be denied the use of most of the seashore. The proposed wilderness area would benefit primarily a few backpackers.

Attempts to Justify the Exclusion of Off-the-Road Vehicles by Subjective, Speculative and Specious Reasoning. Vehicles have been used on the banks north of Drum Inlet at least since the 1940's. There has been no noticable decrease in animal population since I started visiting this area in 1956, usually in the spring and fall. I have never seen a turtle of any kind, or any evidence of same in this 24-year period. In fact, the only wild animals I have seen on shore south of Swash Inlet have been birds, insects, crustaecians, and one snake.

With respect to nesting birds, I submit that backpackers would disturb nesting birds more than passing off-the-road vehicles, simply because a backpacker would take longer to pass on foot. The temperature drop on incubating eggs, therefore, would be less impacted by off-the-road vehicles than people passing on foot. (Ref: Draft Environmental Impact Statement, page 86)

The problem of abandoned vehicles appears to have been stopped at least 2 years prior to NPS takeover of the banks as the North Carolina Department of Natural Resources required

The concerns over scenic and other "intrusion" of vehicle tracks expressed in the draft plan and environmental impact statement are grossly exaggerated. In the first place, vehicles traveling the beach take the easiest path available to save time and reduce fuel consumption. At low tide, this means traveling the hard beach close to the water. At high tide it is necessary to travel the beach above the high water mark. On Portsmouth Island, there is a sand road back of the dune line used by most vehicles traveling northeast and southwest when high tide prevails and when several miles are to be traversed. The top two photos on page 61; of the draft environmental impact Statement depict this road and two of its exits to the beach. This road has been in existence many years and does not intrude on environmental scenic value any more than any other road. It serves a useful purpose as an all weather road running most of the length of Portsmouth Island, and keeps vehicles off the beach on distance runs. The tracks shown on the beach itself in the bottom picture on page 64 are typical of tracks which would be completely covered in short order by either a high "full moon" tide or a northeast wind (prevailing winds are from the northeast).

~ >

Re: Alternatives for Proposed Seashore

Dear Mr. Riddle:

In regard to the alternatives for Cape Lookout National Seashore I would like to strongly endorse Alternative 1 (The Proposal) as the management strategy for the park.

The main reason I support Alternative I is because of its limited use of vehicular traffic which I believe is damaging to the fragile environment 117 of a barrier island. The dunes and grasslands play an important part in reducing the effect of overwash and should be protected from vehicles hurting the root systems and leaving ruts. As well, nests and hatchlings of loggerhead turtles, several varieties of shorebirds and large populations of organisms beneath the sand surface such as soft shell clams and ghost crabs suffer when subjected to the same traffic. I don't believe there is any way to really control movement of private vehicles once they are permitted on these islands.

These reasons should be enough to limit traffic to public transport, but I also object to seeing and hearing cars and trucks in an area where a person is expecting to see only the beauty of sand, sky and water, supposedly leaving the trappings of our car oriented society behind me. It is an intrusion by something that has no place there.

I support Alternative I because it gives limited access to people, but will protect large areas of the seashore for the above reasons.

Sincerely,

Shirl Lessler 701 Northbrook Drive

Raleigh, NC 27609

cc: Superintendent Neal Guse Governor Jim Hunt

RESPONSES

117 Recently, NPS has instituted an interim plan to control vehicles as necessary at Cape Lookout National Seashore by closing off some previously used vehicle routes/roads and restricting vehicles to designated corridors during critical wildlife nesting and hatching periods. Preliminary results are positive-good stands of seagrasses are being established in areas previously barren, and nesting terns and sea turtles and their hatchlings have been protected. NPS believes continuation of such a program will allow resource protection while accommodating visitor use at the seashore.

Superintendent

P. O. Box 690

Cape Lookout National Seashore

Beaufort, North Carolina 28516

I have lived in Carteret County for two years and have conducted biological research on planktonic larvae in the sounds which lie inside the barrier islands. Through my studies, I have become very impressed with both the importance and the frailty of the outer banks. One only need visit Radio Island and Bogue Banks to view the abuse which can result from unlimited vehicle access.

Since the Park Service is charged with the protection of natural habitats for recreational and resource purposes, it makes perfect sense to require that O.R.V.s not be allowed on the majority of the islands, since they are so destructive to natural habitats. There is evidence to support the hypothesis that O.R.V. activity greatly increases the erosion of beaches during storms because of the impact on dune-holding plants. Thus, C.R.V.s have the capability of causing unnatural movement of the islands themselves, according to Paul Godfrey, who has worked extensively on the barrier island problems.

In remanse to some of the arguments that have been raised concerning access to the beaches by young and old people, I would point out that young and old people could easily tolerate several hours outdoors in the spring, fall and winter on the outer banks. The scorching heat of midsummer would be intolerable to youngsters and old people regardless of their mode of transport. It is absurd to suggest that limiting vehicles denies a non-walking person a chance to visit the beach. Atlantic Beach, all of Bogue Banks, Bear Island, etc. are extremely accessible to all. I also believe that a beach taxicab on Core Banks can be safer, more economical, quieter and allow more access for all people than the present situation allows.

To me, the main concern should be the protection of a large, beautiful, mostly unspoiled beach, one of the precious few left in the country on either coast in the warm-temperate regions. The importance of allowing the Loggerhead turtle a peaceful nesting beach should not

RESPONSES

118 NPS has rewritten the GMP for Cape Lookout National Seashore to allow controlled use of vehicles on Core Banks and Portsmouth Island. NPS believes the plan as now written with appropriate resource protection safeguards will allow a variety of visitor uses without compromising the park's important resource attributes.

be overlooked either. Their refuges are dwindling every year. There are so few truely natural areas left in this country, I feel that we must save this small fraction as a heritage for future generations of people. I believe that the value of this approach and philosophy will be appreciated by more and more people as the man-dominated world becomes increasingly ordered and lifeless.

I am also in favor of removing the livestock from Shackleford Banks and putting tourist facilities (bathroom, interpretive station) at the points of ferry landing.

Thank you very much for this oprortunity to express my opinion.

Alice Lindahl

125 Ann Street Beaufort, North Carolina 28516

119

COMMENTS

150-17 7th Avenue
Whitestone, N.Y. 11357
October 11, 1980

Superintendent
Cape Lookout National Seashore
P.O. 690

Beaufort, North Carolina 28516

Dear Superintendent,

The following letter is in response to the invitation to comment on the Environmental Statement and General Management Plan published earlier this year.

Insuring the natural and protected state of the park is urgent and must be a major objective of any developmental action. Proposals curtailing development are acceptable for the future management of the park.

The prevalent proposal, Alternate 1, providing for 71% of emergent land to be designated for wilderness and restricting growth is in my opinion not entirely acceptable. However, This possibility of action is definitely preferred over Alternate 2 (no action) or Alternate 3 (maximum development). To preserve the future of Cape Lookout, Alternate 4, of providing maximum wilderness should be followed or utilized as a foundation for action.

RESPONSES

119 Thank you for your comments. Your views have received careful consideration in the NPS decision on the Cape Lookout GMP. NPS believes the plan as now written furthers our mission of protecting resources and providing for visitor use.

Accurately presented in the literature was the analyses of probable conditions under each alternative. Pointed out, rather clearly, was the fact that the public would not be denied opportunity for recreation, but activity levels would vary with each plan. Opposition and discontent out of any movement to prevent development or eliminate certain existing practices must be acknowledged and respected. Granted such grievances are justified and valid under certain conditions, however, I feel that there is no basis for such a view within the plan for Cape Lookout. The premise of my statement is based upon the substitution availability of recreation facilities within the region.

Examing a map illustration the stock of state and federal recreation sites will show that there is an abundance of parklands. (See attached map.) Preserving Cape Lookout will not affect the convenient availability of recreation sites for most visitors. Locations such as Croaton National Forest, Cape Hatteras National Seashore, Hammocks Beach, and Fort Macom State Park allows ample opportunity to injoy park land. Even with Cape Lookout limited use under alterative 4, fully developed seashore access is readily available within the region.

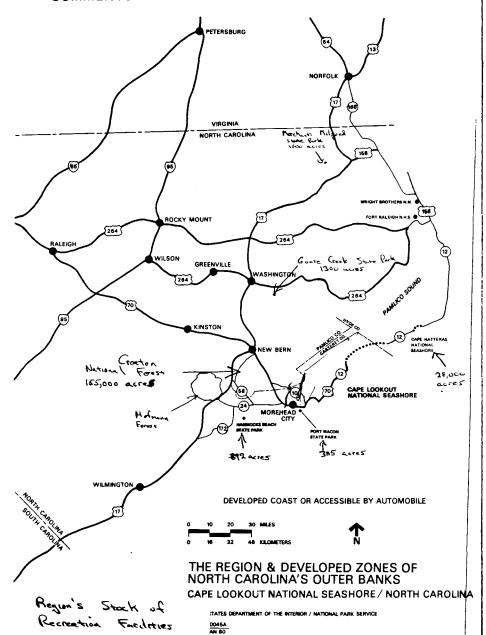
The only objection I have to Alternative 4 is the non-provision of preservation of historical structures within the park. A maintenance program should be provided to keep the facilities in repair for potential use in the future.

Besides the issue of which alternative would best suit the park, other usemes were still being disputed. They were as follows:

- A. CONTINUATION OF PRIVATE VEHICLE USE Under no condition should any private vehicle be allowed in the park. The destructive process which represents the activity of a minority causes substanal damages that the rest of the population must bear. This is wrong and undesirable.
- B. CONTINUATION OF OVERNIGHT CABIN ACCOMMODATIONS
 This practice must be stopped, as any development serves
 as a threshold effect for justification of additional
 development.

Sincerely yours,

Avard McCloskey



Dear Sir:

120

121

122

It is with pleasure and considerable interest that I submit the following comments on the Cape Lookout National Seashore management plan and wilderness study. I am presently a regular user of the Cape and have been so for years. I look forward to even greater use under the National Seashore program of management. Boating, fishing and general sightseeing (with possible future hunting) are prime reasons I travel from the Capital City to the Cape.

I generally support the proposal including the wilderness designation with but one significant qualification covered in item one of my list of specifics.

- (1) ORV Use I do not own an ORV or participate in ORV activity. However, total ORV elimination, as you know better than I, will be hotly contested. Perhaps some of the traditional ORV use, though highly regulated, could continue on the Core Banks wet beach only while still allowing the Park Service to achieve its prime goal of wilderness concept for a majority of the Seashore area.
- (2) <u>Domestic Animals</u> Certainly to protect native vegetation etc., most of the domestic animals (goats or sheep) must be removed. However, I strongly urge that a small manageable herd of wild ponies be allowed to remain. In a sense, these are "native". I know my guests always delight in seeing the ponies at the east of Shackleford. Removing all of the ponies would be a loss to the Cape scene.
- (3) Docking For Small Craft It is stated in the DEIS that no docking facility for private craft will be available. Boats would have to be beached and left dangling on an anchor line as the tide ebbs and floods. I strongly urge that unobtrusive finger piers to serve a reasonable number of small craft, perhaps 25, at each of the three access locations be included in the program. The Cape is a boaters

- 120 The plan now calls for regulated vehicle use at Cape Lookout National Seashore.
- 121 The plan now calls for a small horse herd to remain on Shackleford Banks.
- 122 There is not now a proposal for private docking facilities at Cape Lookout. But, if demand should warrant in the future, NPS would consider the possibility of private docking facilities.

- (4) <u>Lighthouse Protection</u> The Cape Light must not be allowed to be undermined by the waters of Barden Inlet. The new dredging concept should help. However, if it requires some rip-rap please lets do it. And I cannot accept the \$3,000,000 inflated Corps of Engineers estimate for such work.
- (5) Cape Jetty One of the best salt water fishing spots in this state is one of the greatest boating hazards. The jetty does not protrude above the water at high tide as it once did. I have personally witnessed three (3) high speed collisions in one afternoon. I believe this to go on all year, with damages in the thousands. Knowing something of boats, boating accidents, etc., it is my strong recommendation that the Park Service, in conjunction with the Corps of Engineers, mark the jetty with a simple range marker, steel pile and placard system with markers embedded in the jetty so as to be above storm sea. The existing bell bouy is of little value except to experienced boaters carrying charts.

Having stated my case I now leave the Cape to your good judgement and further management. I would appreciate being notified of significant actions and of any opportunity for further input as the project matures.

Very sincerely,

John Cally.

RESPONSES

123 Please refer to responses 8, 26, 43, 75, and 126.

124 This should be called to the attention of the Corps of Engineers since this is their facility.

24

muy fair proposed to all on This sees fragula as it is not necessary for a true past twenty years with great seres to carry home ten or fifteen coolers Public transportation is the only fair way to serve all and any this should have

RESPONSES

1 25 The plan as now written allows controlled vehicular access to Core Banks and Portsmouth Island. NPS believes that measures can be taken to protect park resources and allow a variety of visitor uses at Cape Lookout National Seashore.

Sheeked Lands on he rained for the Satismatite its first and for the Satismath to the Satismatite its first bearing the hands of the satisman of the Satisman

P.O. Box 388
Beaufort, N.C. 28516
Sept. 15, 1980

Preston "Mack" Riddel Superintendent Cape Lookout National Seashore P.O. Box 690 Beaufort, N.C. 28516

Dear Mack:

126

It concerns me that the proposed general management plan for Cape Lookout National Seashore does not include plans to protect the lighthouse complex from erosion.

The National Park Service has taken the position that nature should be allowed to prevail. I disagree.

Studies by the U.S. Army Corps of Engineers have shown ways the complex could be protected. One should be implemented jointly by the park service and U.S. Coast Guard immediately because the lighthouse is worth saving.

The park service and Coast Guard point out that there is nothing especially unique about the lighthouse. There are others.

There are not other lighthouses in Carteret County and very few in North Carolina. The lighthouse is the symbol of the park and has been adopted by several groups and businesses locally as their symbol.

I find the lighthouse as awe inspiring as the first time I saw it 15 years ago. I have lived in Carteret County for seven years and still find myself looking for it on clear days when I drive across the Newport River Bridge.

The lighthouse, with the nearby keepers quarters, oil shed and kitchen, represent a way of life that no longer exists. It is a way of life that deserves preserving.

RESPONSES

126 It is the harshness of the environment at the lighthouse complex, to which you refer, that makes it difficult to determine whether the expenditure of millions of dollars of public funds for engineering works is prudent. Recent Corps of Engineers actions in dredging and depositing spoil material have seemed to decrease the erosion rate, thereby relieving the immediate threat from this source. If the lighthouse is threatened in the future, NPS and the U.S. Coast Guard, which owns the lighthouse, will cooperate on a decision about protecting the lighthouse. The public will have an opportunity to comment on any alternative protection strategies being considered.

251

-2-

Today visitors can look at the structures and appreciate the harsh environment that the keeper and family contended with while living on the barrier island. At the same time, the visitor can experience a feeling of solitude residents must have felt during quieter times of the year.

If the lighthouse and surrounding structures are allowed to wash away, there will be no reason for me to visit Core Banks. I can beachcomb on Bogue Banks.

Sincerely,

Sarah Jo Sarah Jo Safrit

SEPTEMBER 10 , 1950 169 RICHNECK ROAD DENSIGH, VIRGINIA 23662

SUPERINTENDENT
CAPE LOOKOUT NATIONAL SEASHORE
P. O. BOX 69C
BEAUTORT, N. C. 28516

SUBJECT: COMMENTS AND SUGGESTIONS FOR THE CAPE LOOKOUT NATIONAL SEASHORE, NORTH CAROLINA OUTER BANKS.

REFERENCE: DPACT ENVIRONMENTAL IMPACT STATEMENT, GEMERAL MANAGEMENT PLAN, WILDERNESS STUDY, DEVELOPMENT CONCEPT PLAN, MAY 1960

DEAR SUPERINTENDENT:

127
I HAVE PEVIEWED THE REFERENCE MATERIAL WHERE—IN THE PROPOSED MANAGEMENT PLAN FOR CAPE LOOKOUT NATIONAL SEASHORE DESIGNATES A PORTION OF COSE BANKS AS A NATURAL AREA AND THE BALANCE OF COSE BANKS, ALL OF SHACKLEFORD DANKS AND ALL OF PORTSMOUTH ISLAND AS VILDERNESS AREAS, AND BANS THE USE OF ORIVATE MEHICLES IN ALL AREAS.

MY PECOMMENDATIONS AND COMMENTS ARE AS FOLLOWS:

- 1. LEAVE THE BEACHES OFER FOR VACATION, SURE, AND COMMERCIAL FISHING VEHICLES FROM OCRACOKE INLET TO CAFE LOOKOUT FOINT.
- 4. THE ABOVE APEA HAS BEEN USED BY SUPP AND COMMERCIAL FISHERMED SINCE THE EAPLY 1940'S AND IS ONE OF THE FINEST FISHING APEAS ON THE EAST COAST. IT WOLLD BE A SHAME TO DEMY THESE PEOPLE FURTHER CONTINUED MEHICLE ACCESS TO THE APEA.
- 3. I CONCUP WITH THE STUDY (ALTERNATE 1) THAT DEVELOPMENT SE KEPT TO A MINIMUM. THE FISHERMEN WILL HAVE NO PROBLEM WITH THIS AS HIS VEHICLE IS ENLIPPED TO SUPPORT HIS NEEDS.
- 4. THE PROPOSED PUBLIC BEACH TRANSPORT SYSTEM FROM SHINGLE POINT TO CAPE LOCKOUT POINT 13 IN THE NICE-TO-HAVE CATAGORY, BUT IS IT PRACTICAL? THE PASSENGERS ARE DROPPED OFF AT VARIOUS POINTS AND ARE AT THE MERCY OF THE ELEMENTS UNTIL IT RETURNS MANY HOURS LATER. BEING ON AN OPEN BEACH DURING SUMMER THUNDER STORMS IS VERY DANGEROUS AND THE VISITOR AND OR SURF FISHERMAN WILL HAVE NO WHERE TO GO TO ESCAPE THE STORM. THERE ARE OTHER EMPERGENCIES THAT ARISE, SUCH AS, HEAT STROKE, JELLY FISH ATTACK TO SVIMMERS ETC. THAT CANNOT VAIT ON THE JENETY BUS. AFTER CONSIDERING EDUIPMENT COSTS, UPKEER, RAFID DETERIORATION DUE TO CLIMATE, EMPLOYEE SALARIES ALL SIDEEZED INTO A SHORT SEASON, A PROSPECTIVE CONCESS—TONAIRE IS GOING TO REALIZE THAT HIS BREAK-EVEN POINT MUST BE QUITE HIGH THUS, THE COST PER PASSENGER COULD BE EYGESSIVE.

RESPONSES

127 Many of your comments are incorporated in the plan as now written.

4. CONTINUED.

TO BE EFFECTIVE IT MUST PUN ON A PEGULAP BASIS, EVEN IF ONLY ONE PERSON IS TO BE TRANSPORTED. THE PROPOSED ON-ISLAND PUBLIC TRANSPORTATION SYSTEM CANNOT BE ACCEPTED AS A SUBSTITUTE FOR PROPEPLY EQUIPPED, PRIVATELY OWNED, BEACH VEHICLES. FURTHER, I WOULD SUSPECT THAT THIS TYPE OF SYSTEM WOULD BE MUCH MORE DETRIMENTAL TO THE ENVIRONMENT THAN THE SUPE FISHERMAMS VEHICLE BECAUSE HE STAYS CLOSE TO THE WATER IN HIS TRAVELS, AND THE VERY NEXT TIDE WILL COVER HIS TRACKS.

- 5. PROTECT AND PERPETUATE THE LOGGEPHEAD TURTLE BY MOVING THE EGGS (75-100) FROM THEIR NEST TO AN AREA WHERE CONTROL HATCHING CAN BE DONE. (PERPENDED PAGE 36 OF DRAFT OF GENERAL MANAGEMENT PLAN). EXPAND YOUR TURTLE PATROL, WHICH IS MORE OF A STUDY, INTO AN ACTION TO SIGNIFINITLY INCREASE THE NUMBER OF HATCHINGS PEACHING THE SEA BY CONTROL HATCHING AND RELEASE. THIS WOLLD ELIMINATE ANY HATCHINGS BEING LOST TO BIRDS ETC ON THEIR WAY TO THE SEA.
- O. SINCE THE APEA HAS BEEN UNDER THE MPS, I HAVE NOT WITHESSED ANY VILOATION OF SAND DUNE CLIMBING ETC. WITH A RIGIDLY ENFORCED VEHICLE PERMIT SYSTEM, ANY VIOLATORS MUST BE DUICKLEY PUNISHED.
- 7. PASSENGEP/VEHICLE MERPHES SHOULD BE PROVIDED MAD COMMONE TO PROTSMOUTH, ATLANTIC TO PORTSMOUTH, DAVIS TO SHINGLE POINT, HARKERS ISLAND TO SHACKLEMORD, AND HARKERS ISLAND TO CAPE LOOKOLT.
- 6. I HAVE BEEN USING FOR THE PAST TWO YEARS, THE 3-WHEEL ATV, NAMELY THE HONDA ATC-11C. I HAVE FOUND FROM UNDEFICIAL STUDIES MADE FOR THE MPS THAT IT PRESENTS VERY LITTLE IMPACT ON THE ENVIRONMENT, IS ECONOMICAL ON GAS (35-40 MPG), AND HAS A VERY LIGHT FOOTPRINT. THEIR USE SHOULD BE ENCOURAGED AND EXPANDED. THE MPS HAS HAD EXCELLENT RESULTS WITH THEIR ATV'S, INCLUDING THE ONES USED ON THE TURTLE PATROL.
- 9. COMMERCIAL FISHERMAN SHOULD BE ALLOWED TO USE THEIR TRAILER MOUNTED DORIES AND 4-WHEEL DRIVE VEHICLES. FISHERMEN USE THIS TYPE OF SYSTEM NOV, AND TO DENY THEIR USE WOULD BE A SHAME. THEY USE THIS METHOD TO SUPPLEMENT THEIR INCOME DURING THE SLACK FISHING MONTES.
- 10. I CONCUR WITH THE STUDY THAT SHAKLEFORD BANKS BE MADE INTO A WILDERNESS AREA. THE EXISTING MARITIME FORREST MUST BE PROTECTED. THE PRIVATE CATTLE AND PONIES SHOULD BE PEMOVED.

255

COMMENTS

11. FINALLY, THE TYPICAL VEHICLE-BASED SUPE FISHERMAN IS A MATURE FAMILY MAN AND MOST LIKELY IS LOOKING FORWARD TO RETIREMENT AND MANY YEARS WITH HIS VEHICLE ON THE OUTEP BANKS. HE IS AWARE OF THE MPS PEGULATIONS, ABIDES BY THEM, AND OPERATES HIS VEHICLE IM AN ORDERLY AND MATURE MANNER. MOST OF THE SUPE FISHERMAN ARE OVER 50 AND FREQUENTLY IS UNABLE TO PURSUE HIS SPORT VITHOUT HIS VEHICLE BECAUSE OF PHYSICAL LIMITATIONS. TO DENY HIM USE OF THE SEASHORE ON HIS REASONABLE TERMS IS A FORM OF DISCRIMINATION THAT IS MOST OUTRAGEOUS.

I FEEL THAT AM AREA OF PUBLIC LAND SUCH AS THIS SHOULD BE FOR USE BY ALL CITIZENS AND SHOULD BE SO MANAGED AS TO BEST MEET THE PEOPEATIONAL INTEREST WHICH THE NATURE AND LOCATION OF THE AREA AFFORDS. THIS CAN BE DONE IN THE CAPE LOOKOUT NATIONAL SEASHORE BY DESIGNATING SHAKLEFORD BANKS AS A WILDERNESS AREA, AND COPE DAMKS AND PORTSMOUTH ISLAND AS NATURAL AREAS WITH CONTROLLED USE OF PRIVATE VEHICLES PERMITTED.

I RESPECTFULLY PETITION THE NATIONAL PARK SERVICE TO PROVIDE FOR THE ABOVE LISTED USES.

PESPECTRULLY YOURS.

12 0

COPIES TO:

U. S. SENATOR HARRY F. BYPD UP. SEMATE OFFICE BUILDING WASHINGTON, D. C.

U. S. SENATOP JOHN'E. VARNEP SENATE OFFICE BULDING VASHINGTON, D. C.

U. S. COMBRESSMAN PAUL S. TRIBLE. UP. 4301 EXECUTIVE DRIVE HAMPTON, VIRGINIA

PEGICNAL DIRECTOR, SOLTHEAST REGION NATIONAL PARK SERVICE, 75 SPRING STREET, SW. ATLANTA, GEORGIA 30503

Sept. 15, 980 147 Emeline fl Monetod lity 10th

Superintenlant, Cape for hout Notinel Seasone Beaufort, North Carolina

Dear Sir.

an opposed to allowing ORV use in substastiol areas of the calcula. One reason vam opposed to ORV use on these islands is the fragile—nature of the islands' hune-march system. Although ORV organizations claim that a minnity of ORV users above areas they utilize even slight abuse to that fragile system can after the magdology of the area of years. Also ORV organizations' claims that policing the areas will be adequate to keep ORV user within regulations lead me to believe that more than a minnity of ORV users will abuse the area.

A second reason toppose DRV were on Forkout National Seaster is securific. The importance of overwork to barrier island geology and the migration of barrier islands are becoming prominent in geology. Cape tookout Seastor can provide an excellent study area for these processes. However, with ORVIVE the mechanisms by which there processes occur

Einell, I do not feel that dam above in wanting an area on the Outer Banks that does not have OKV's or the sound I motor vehicles. I am not against ORV use but they are plantited to go almost anywhere. It would be nice to have a place to go that has no vehicles, where one can walk and hear the brids and ocean; see the crobs and textles (if any textle nexts + eggs remain uncrushed by vehicular troffic!).

Joseph lestal

128 The plan as now written will allow controlled vehicle use of Core Banks and Portsmouth Island. NPS believes--based on recent experience--that such an arrangement can result in the protection of park resources while allowing a variety of visitor uses.

Pivers Island . Beauforte Morth Garolina 28516 Phone (919) 728-2714 Telex 801251

To: Superintendent of Cape Lookout National Seashore

Sept 25, 1980

Dear Sir:

I am writing to you to voice my opinion concerning the outer banks wilderness proposal. I am unquestionably in favor of a plan heavily weighted toward wilderness.

There is precious little pristine, undeveloped seashore along the entire eastern seaboard, and the bulk of what little there is lies along the North Carolina coast. We therefore have the responsibility of protecting these islands. Like the sea, the beach belongs in the public domain. There must be a beach where the effects of man are indistinct. Tire tracks and beer cans are by no means indistinct.

Those who oppose the ban on off-road vehicles are simply re-expressing the erroneous view that there is a god-given right to drive a vehicle anywhere one pleases. The arguments of people opposed to the wilderness plan banning ORV's boil down to one thing: convenience. We cannot sacrifice the tenor of an entire wilderness for the convenience of an outspoken minority. If the intent of setting aside these lands is to preserve and maintain them for future generations, then access to the islands should be made less convenient, rather than more. There must be some balance struck so that the land is not destroyed or despoiled while allowing it to be enjoyed. If an area is difficult to get to those that put forth the extra effort will have more respect for and be more gentle with the land. At the very least it cuts down on the volume of trash toted in and abandoned. Allowing free or even restricted travel by four-wheel drive vehicles would make the efforts at protecting the islands laughable. To knuckle under to the self-serving interests of sports fishermen and others who stand to make money off the islands is more than laughable; it is a crime against the nation and the future.

> Sincerely, Garth Ware

RESPONSES

129 No response necessary.

University of North Carolina

at Minington 28406

7 October 1980

DEPARTMENT OF BIOLOGY

MARINE SCIENCE BUILDING IN

Superintendent Cape Lookout National Seashore Post Office Box 690 Beaufort, North Carolina 28516

Dear Sir:

130 I am interested in coastal ecology, and have conducted a study that could be used as evidence for the retention of Cape Lookout National Seashore as a minimally-disturbed barrier island.

My study was conducted at Fort Fisher and Bald Head Beaches to determine the effects of off-road vehicles on small mammal populations. Week-long trapping was conducted in December, March, June, and September. Traps were set along transects from the foredunes to the marsh. All collected mammals were weighed, and are deposited at the University of North Carolina at Wilmington.

Past studies of ORV effects on plants, ghost crabs, reptiles, and birds have noted decreases in population numbers and total biomass on disturbed barrier islands. My data, however, indicate a threefold increase in numbers and biomass on disturbed (Fort Fisher) barrier beaches.

	House Mice (<u>Mus musculus</u>) Fort Fisher Bald Head		Rice Rats (<u>Oryzomys palustris</u>) Fort Fisher Bald Head	
Biomass	665.2 gm	203.0 gm	2217.1 gm	806.1 gm
Number	N = 50	N = 14	N = 46	N = 18

These data are to be published in the American Midland Naturalist with Drs. Paul Hosier and Medha Kochhar. We believe the increase of small mammals on barrier islands is in response to the extirpation of predatory species. Marsh hawks are migratory and have been observed on both islands in September and October, but gray foxes and snakes (coachwhips and black racers) have been observed only on the undisturbed (Bald Head) island.

The University of North Carolina at Wilmington is a constituent institution of THE UNIVERSITY OF NORTH CAROLINA — William C. Friday, President

RESPONSES

130 We appreciate your providing us with the results of your research.

Cape Lookout National Seashore 7 October 1980 Page No. 2

In conclusion, ORVs have extirpated the top carnivores from disturbed barrier islands which has resulted in a threefold increase in rodent populations. Predators on undisturbed islands regulate rodent populations at lower levels. Any development at Cape Lookout should be minimal.

Respectfully,

David Webster

Wm. David Webster Instructor

WDW:rep

Mr. Headen G. Willia P. O. Box 176 Marshallberg, N.C. 208553

October 1, 1980

Superintendent Cape Lookout National Seashore P. O. Box 690 Beaufort, North Carolina 28516

Dear Sir:

This is in response to the May 1980 draft Environmental Impact Statement (EIS). For the reasons set forth in this letter, I do not believe either of the alternatives numbered 1 or 4 should be adopted without modification.

Specifically, I contend that the prohibition against private vehicle use has not been demonstrated to be essential to the proper management of the Cape Lookout National Seashore area as a wilderness area and has failed to give adequate consideration to the needs and privileges of those with whom the Government has granted reserved use and occupancy rights. These rights are described on page 36 of the General Management Plan which supports alternative number 1 of the EIS, and were established by Statute (P. L. 89-366, Sec. 2(c)). Section 2(c) states in part:

"(c) Any person who on January 1, 1966, owned property which on July 1, 1963 was developed and used for noncommercial residential purposes may reserve for himself and his assigns, as a condition to the purchase or acquisition by exchange of such property by the Secretary, a right of use and occupancy of the residence and not in excess of three acres of land on which the residence is situated, for noncommercial residential purposes for a term ending at the death of the owner, or the death of his spouse, or the death of either of them or, in lieu thereof, for a definite term not to exceed twenty-five years . . ."

This same requirement exists in the Wilderness Act (P. L. 88-577) at Sec. 4(c) which contemplates the retention of existing private rights.

To those who still have homes in the area which would be affected, and who, by entering into agreements with the Government have an occupancy right, the prohibition against private vehicle use violates the intent of our agreements by drastically limiting the use of our residences. Neither the Management Study nor the EIS have considered adequately this impact and effect. If an alternative restricting vehicular use is adopted, some express provision should be made to allow these citizens who have been granted reserved use and occupancy rights to continue the use of their private vehicles.

RESPONSES

131 The plan as now written allows controlled vehicle use on Core Banks and Portsmouth Island. We believe that with proper safeguards and monitoring, resources of the park can be protected while visitor use is accommodated.

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COMMENTS

In general, I am in support of all the Seashore being used by the public but not abused, and the use of private vehicles in a controlled fashion. However, the adoption of the recommended alternatives nos. 1 and 4 will render the Cape Lookout National Seashore useless and the law establishing it meaningless, to wit: public use and enjoyment.

Sincerely,

Heading & Willis HEADEN G. WILLIS

Copy to: Senator Jesse A. Helms 4213 Dirken Senate Office Bldg. Washington, D. C. 20510

Senator Robert B. Morgan 5313 Dirken Senate Office Bldg. Washington, D. C. 20510

Representative Walter B. Jones 241 Cannon House Office Bldg. Washington, D. C. 20510

Secretary of the Interior Department of the Interior C St. Bet. 18th & 19th St. N.W. Washington, D. C. 20240

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As the nation's principal conservation agency, the Department of the Interior has basic responsibilities to protect and conserve our land and water, energy and minerals, fish and wildlife, parks and recreation areas, and to ensure the wise use of all these resources. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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