

February 13, 2002

Mr. Bill Perhach  
Council on Environmental Quality  
722 Jackson Place, N.W.  
Washington, DC 20503

Re: Construction of a Dual Jetty System at Oregon Inlet, Dare County, North Carolina

Dear Mr Perhach:

Please find attached a resolution approved by the North Carolina Chapter of the American Fisheries Society (NCAFS) regarding the construction of a dual jetty system at Oregon Inlet in Dare County, North Carolina. In our professional opinion, construction of the dual jetty system at Oregon Inlet poses a significant potential threat to fisheries and coastal resources. The Environmental Concerns Committee of the NCAFS identified this issue to be a significant concern to the membership and developed the resolution. The resolution was presented to the NCAFS membership, voted on and approved at its annual meeting on February 6, 2002.

The NCAFS has a diverse membership. Its 139 members represent fisheries scientists from academic institutions, state and federal management agencies, and private institutions. Most NCAFS members are also members of the American Fisheries Society (AFS). The AFS was founded in 1870 and is the oldest and largest professional society representing fisheries scientists. The AFS promotes scientific research and enlightened management of aquatic resources for optimum use and enjoyment by the public.

We appreciate the opportunity to provide input on this project.

Sincerely,

Shari L. Bryant  
President  
North Carolina Chapter, American Fisheries Society  
P.O. Box 129  
Sedalia, NC 27342-0129  
336-449-7625  
bryants5@earthlink.net

cc: Jeff Boxrucker, President, Southern Division American Fisheries Society  
Fred Harris, President Elect, American Fisheries Society

**RESOLUTION ON THE CONSTRUCTION OF A DUAL JETTY SYSTEM AT  
OREGON INLET, DARE COUNTY, NORTH CAROLINA.**

**NORTH CAROLINA CHAPTER OF THE AMERICAN FISHERIES SOCIETY**

WHEREAS, Oregon Inlet is located on the Outer Banks of North Carolina between Pea Island and Pea Island National Wildlife Refuge to the South and Bodie Island and Cape Hatteras National Seashore to the north; and

WHEREAS, Oregon Inlet is the only connection between the Atlantic Ocean and the Currituck-Albemarle-Pamlico Estuary System (CAPES) along the 130-mile length of the North Carolina Northern Outer Banks; and

WHEREAS, the United States Army Corp of Engineers (USACE) currently operates a program to support safe and navigable passage through Oregon Inlet by dredging a channel 14-feet deep from the inlet to Roanoke Island; and

WHEREAS, the USACE has proposed an alternative to the current dredging of a 14-foot deep channel through the construction of a dual-jetty system, which includes (i) construction of 2000-foot long rock jetties on either side of the inlet extending from the shore to the 20-foot depth contour, (ii) dredging to maintain a channel not greater than 20-foot depth from the Inlet to Roanoke Island, and (iii) implementation of a sand management system whereby sand and sediment that will accumulate on the north side of the inlet will be physically transported to the beaches to the south of the jetty using a pipeline dredge; and

WHEREAS, CAPES and its adjoining rivers, bays, and tributaries support juvenile and adult life stages of a majority of the commercially, recreationally, and ecologically important species in the Mid- and South Atlantic coast; and

WHEREAS, Oregon Inlet is the principle corridor for ingress of larval forms of commercially, ecologically, and recreationally important fin- and shell-fish to northern regions of the CAPES and further serves as a corridor for emigration of juvenile and adults of species which use the near- and off-shore environment for spawning grounds in the Mid- and South-Atlantic; and

WHEREAS, the dual jetty system may cause major alterations in the hydrodynamics, which may in turn impede the natural transport of fin- and shell-fish through the inlet, into and out of nursery grounds of CAPES; and

WHEREAS, alterations in channel dimensions by the proposed jetty system, dredging and sand bypass system may alter sand and sediment movement, which may reduce the quality and quantity of habitats at or adjacent to Oregon Inlet that serve as spawning grounds for blue crabs and red drum, both state-managed species in North Carolina; and

WHEREAS, the South Atlantic Fishery Management Council has designated Oregon Inlet a Habitat Area of Particular Concern (HAPC), the highest tier of Essential Fish Habitat (EFH) –

habitat essential for supporting any of a number of stages of species of ecologically or commercially important estuarine species; and

WHEREAS, North Carolina is in the process of implementing the 1997 Marine Fisheries Reform Act, which requires extensive management of species under state management and long-term enhancement of the habitat value of all coastal waters, including Oregon Inlet and adjacent regions; therefore, be it

RESOLVED, that the North Carolina Chapter of the American Fisheries Society (NCAFS), which includes fisheries professionals from throughout North Carolina's academic institutions, state and federal management agencies, and private institutions, supports efforts to maintain safe navigable waters through Oregon Inlet while minimizing adverse environmental impact to coastal fisheries populations; furthermore, be it

RESOLVED, that the NCAFS supports the position of National Oceanic and Atmospheric Administration, the US Fish and Wildlife Service, and the National Park Service that the proposed construction of the dual-jetty system at Oregon Inlet poses a significant potential threat to the health, reproduction, and survival of fisheries and coastal resources; furthermore, be it

RESOLVED, that the NCAFS supports research in the form of directed experimental field studies and modeling to more fully understand the potential impacts that constructing such a jetty system would have on the reproduction, survival and health of coastal fisheries resources; furthermore, be it

RESOLVED, that the President of the NCAFS shall communicate these sentiments of the membership in a letter to the appropriate legislative body or bodies, including but not limited to the Chair of the Council on Environmental Quality.

**Approved by the membership on 6<sup>th</sup> day of February 2002.**

JOHN EDWARDS  
NORTH CAROLINA  
(202) 224-3154

United States Senate  
WASHINGTON, DC 20510-3201

COMMITTEES:  
COMMERCE, SCIENCE, AND  
TRANSPORTATION  
HEALTH, EDUCATION, LABOR,  
AND PENSIONS  
INTELLIGENCE  
SMALL BUSINESS

March 20, 2002

Mr. Shari L. Bryant  
President  
American Fisheries Society  
PO Box 129  
Sedalia, NC 27342-0129

Dear Mr. Bryant:

Thank you for contacting me about Oregon Inlet. I appreciate hearing from you.

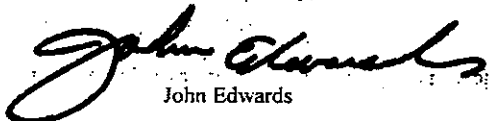
I have spoken personally with many representatives on both sides of the jetties issue and have heard from numerous North Carolinians with expertise in biology, geology, and environmental protection.

I have written to the General Accounting Office to request a review of an Army Corps of Engineers project in the Oregon Inlet of North Carolina. Specifically, I asked the GAO to consider:

- Whether the Corps adequately assessed alternatives to the jetty project;
- Whether the Corps considered all relevant factors and interests (*e.g.*, harm to the environment) in its determination that the jetty project is the preferred option;
- Whether the Corps adequately performed the cost benefit and economic analysis;
- Whether the existing analysis of the proposed jetty system sufficiently ensures that the project will provide for a navigable channel after completion; and
- Whether the Corps adequately assessed similar jetty projects at other inlets to gauge the likely impact on Oregon Inlet and the surrounding environment.

Please be assured that I will keep in mind your organization's resolution as I consider further action on this project. Again, thank you for your letter. Please feel free to contact me if I can be of any assistance to you in the future.

Yours sincerely,



John Edwards

JE/lh