

November 21, 2016

Sara Burroughs, RLA Sage Design 228 North Front Street, Suite 202D Wilmington, NC 28401

Re: Hammocks Beach State Park Mainland Area Recommendations and Development Concerns - Issues related to the addition of 300 acres to Hammocks Beach State Park at the mainland access near Swansboro, N.C.

Dear Ms. Burroughs,

Due to the loss of habitat and habitat fragmentation as a result of extensive residential development along Hammocks Beach Road and the entire peninsula or "hammock" on which the Hammocks Beach State Park mainland access area is situated, the 300-acre addition is the only remaining forested area that serves as critical habitat for native plants and animals in that area. Extensive valuable maritime shrub thickets line the entire shoreline along the Queens Creek boundary of the property which is critical habitat for the song bird, the painted bunting. In North Carolina, this species is listed as a federal species of concern by the U.S. Fish and Wildlife Service. They have also been designated as a Watch List Species by Partners in Flight, and BirdLife International has categorized them as Near-Threatened. It is recommended that none of this critical habitat be disturbed.

Much of the property consists of wetlands and is a valuable "sponge" to absorb rainfall and prevent flooding along Hammocks Beach Road and surrounding residential housing as well as preventing polluted stormwater runoff from entering into the adjacent Queens Creek. Five tidal creeks reach into the property along the Queens Creek boundary. These creeks serve as vital nursery areas to a multitude of finfish, crustaceans and shellfish. The property functions as the watershed for these creeks. Disturbing these areas will result in the loss of estuarine habitat, increased stormwater runoff and the potential for flooding.

Any potential development of the area should be restricted to low impact activities such as hiking, primitive camping, picnic areas and educational programming that can be accessed by means of the three existing roads on the park mainland property. Additional roads will result in more impervious surfaces that promote stormwater runoff.

There has been much discussion regarding a multiple lane boat ramp with extensive parking to be situated along Queens Creek at the north end of the property. This idea is ill conceived for many reasons, which include: loss of maritime shrub thicket habitat, filling of wetlands, increased stormwater runoff, disturbance of primary nursery areas, significant increases in impervious surfaces and if channel dredging is necessary, the associated environmental impacts. Boat wake waves associated with a boat ramp will undermine and destroy the already fragile salt marsh shoreline leading to continued erosion. Also, with the popularity of Queens Creek as a kayaking destination, a boat ramp will increase safety issues with low profile kayaks moving around the marsh islands of the creek.

The shoreline along the mainland area of the park, in particular the areas in close proximity to the ferry terminal have eroded significantly in the last 10 years due to boat wakes and storms. Several locations have completely lost the intertidal salt marsh species, *Spartina alterniflora*, with only upper marsh species remaining. If nothing is done to protect this valuable salt marsh habitat, the park will continue to lose marsh and will begin to also experience the loss of trees and shrubs in the next few years, which offer the only protection of the Visitor Center from detrimental waves and water levels from boat wakes and storms. It is recommended that the park continue to implement living shorelines along the mainland area of the park to prevent further erosion and restore the loss of valuable salt marsh habitat as has been demonstrated by the successful and productive living shorelines at Jones Island and at the mainland maintenance area.

Any ground disturbance must also take into account the cultural and archeological significance of the property. Past excavations have demonstrated that the Hammocks Beach peninsula was an important village site for Algonquian Native Americans and included middens and ossuary burial sites. Archeological assessments would most likely be needed for approval to significantly disturb the ground.

The purpose of purchasing the land was to preserve and protect a valuable natural resource. Any development should be reflected in a way to enhance a visitor's appreciation and understanding of that resource through low impact activities. Hammocks Beach State Park is one of the jewels of the North Carolina State Park system. Bear Island is a designated National Natural Landmark, Huggins Island is a dedicated Nature Preserve and Jones Island serves as a model example of habitat restoration through the creation of living shorelines and oyster reefs. Any development of the mainland property should not in any way compromise the integrity of these great natural resources and the allure of Hammocks Beach State Park. Unwise development of the property negates the purpose of purchasing the property for preservation.

Sincerely,

Todd Miller

Executive Director

Sam Bland

Coastal Specialist and former Superintendent,

Hammocks Beach State Park

cc: Sarah Kendrick, Superintendent, Hammocks Beach State Park
Michael A. Murphy, Director, Division of Parks and Recreation
Brian Strong, Chief of Planning and Natural Resources, Division of Parks and Recreation
Adrian O'neal, Chief of Operations, Division of Parks and Recreation
John Fullwood, East District, Division of Parks and Recreation
Jonathan Avery, Department of Natural and Cultural Resources