



3609 Highway 24 (Ocean) Newport NC 28570

July 28, 2010

Jimmy Johnson  
CHPP Coordinator  
NCDENR  
943 Washington Square Mall  
Washington, NC 27889

Dear Jimmy:

The Coastal Federation continues to applaud DENR staff and members of the CHPP Steering Committee for developing the original 2004 Coastal Habitat Protection Plan.

CHPP has not been on a shelf collecting dust like many other coastal plans. Instead, the Steering Committee and supporting staff have worked diligently over the past five years to implement key goals and strategies of the plan.

The joint efforts of the Marine Fisheries, Environmental Management, Coastal Resources and most recently the Wildlife Resources commissions to support and implement a coordinated management approach to the six key coastal habitat types is unmatched by any other planning effort in the state.

The Coastal Federation is supportive of the significant accomplishments of CHPP including improved interagency coordination, the coastal stormwater rules, oyster reef sanctuary development and an accelerated oyster shell recycling program.

As you finalize your update of the CHPP we encourage you to include the following:

Goal 3. (2) ***Sustain healthy barrier island systems by maintaining and enhancing ecologically sound policies for ocean and inlet shorelines.*** This strategy should make clear the need to maintain the current state law banning hard structures on our beaches and inlets.

**Citizens Working Together For Healthy Coast™**

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Goal 3. (4) ***Protect estuarine and public trust shorelines and shallow water habitats by revising shoreline stabilization rules to include consideration of erosion rates, and the benefits of alternatives to vertical shoreline stabilization measures that maintain shallow nursery habitat.*** Overall, CHPP states the need for management strategies that are based on a 1 m per 100 yr rise in sea level. We encourage the CHPP to make revising our current shoreline stabilization rules to allow for natural migration a priority. Alternatives to bulkheads should be viewed and permitted as the preferred alternative over vertical structures.

Goal 3. (6) ***Ensure that energy development and infrastructure is designed and sited in a manner that minimizes negative impacts to fish habitat, avoids new obstructions to fish passage, and where possible provides positive impacts.*** We encourage the CHPP to instead say “*Offshore drilling for petrochemicals is not compatible with North Carolina coastal policy because of potential effects to the water column and all other habitats from daily incremental pollution, potential catastrophic spills, and the need for industrial on-shore infrastructure.*”

Finally, we suggest that under goal 4 ***Enhance and Protect Water Quality*** you consider including recommendations for increased on-site infiltration of stormwater and the use of Low Impact Development (LID) techniques to meet the coastal stormwater rules in both the incentives section (5) and the rule making section (6).

New EPA guidance calls for the use of LID and infiltration strategies to treat and prevent stormwater. The NC DWQ is promoting LID and has indicated an even stronger commitment to LID in the future. It would be important for CHPP to reflect this. We suggest adding under Goal 4 (6) LID is considered to be the best available technology standard for reducing polluted stormwater runoff.

Thank you for the opportunity to comment on the draft CHPP. Please let us know if you have any questions about our suggestions. We will continue to support your efforts as you finalize the document.

Sincerely,

Lauren Kolodij  
Deputy Director

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