



Friends of Jockey's Ridge

P.O. Box 358 ♦ Nags Head, NC 27959

April 25, 2024

Coastal Resources Commission

Dear Commissioners,

On behalf of the Friends of Jockey's Ridge, a nonprofit established in 1991 to support the mission of protecting Jockey's Ridge State Park, we would like to reiterate our most recent comments made to both the CRC and Rules Review Commission and are opposed to the recent decision by the Rules Review Commission to object the temporary rules adopted by the CRC.

The Area of Environmental Concern (AEC) is an important piece of protection for Jockey's Ridge State Park and we believe it is authorized by the CAMA. We support the establishment of a permanent rule, and note that Part 3 113A-113(b)(4) of 15A NCAC 07H .0507 (Unique Coastal Geologic Formations), explicitly sites state parks are eligible for AEC protection while subsection (g) includes "Areas containing unique geological formations". We believe the rules as previously adopted are both unambiguous and necessary to protect the integrity of the dune system. The dune system is a unique landscape that requires protections to allow for management of migrating sand, as well as protection from development. The AEC designation is critical for replenishing migrating sand back to the dune system, maintaining its volume and preventing its relocation or being able to be used for commercial sale.

In the early 1970's development threatened the dunes and locals and visitors alike stepped up to preserve and protect this unique site and, in 1975, it was established as Jockey's Ridge State Park. The park was founded as a National Natural Landmark. The National Natural Landmarks Program recognizes and encourages the conservation of sites that contain outstanding biological and geological resources. Sites are designated by the Secretary of the Interior for their condition, illustrative character, rarity, diversity, and value to science and education. There is no question that the site qualifies for protection as an Area of Environmental Concern.

Jockey's Ridge State Park covers a 427 acre area and includes the tallest active sand dune system in the eastern U.S. Visited by over 1 million visitors a year, it has remained a top destination for those visiting the East Coast and the Outer Banks, NC. At Jockey's Ridge, we not only host daily visitors from around the world, but also host field trips for students, weekly environmental educational programming, nature hikes and community events. Protection of Jockey's Ridge is important given its significance to its visitors for recreational purposes, but also because of its scientific and ecological importance. It provides an important habitat for native plants and animals and is an important resource for environmental educational, including research surrounding adaptation of plant and animal species to this specific type of environment.

Friends of Jockey's Ridge supports the creation of a permanent rule for the re-establishment of protections from the AEC for Jockey's Ridge State Park because of its unique coastal geologic formation.

Sincerely,

Craig Honeycutt, Chairman of the Board of Directors, Friends of Jockey's Ridge