

July 12, 2006

The Honorable Dirk Kempthorne
Secretary of the Interior
1849 C St., N.W.
Washington, DC 20240

Dear Mr. Secretary,

We are writing today to express our grave concerns about the proposed replacement of the Herbert Bonner Bridge across Oregon Inlet on North Carolina's Outer Banks. The alternative that is selected will have serious, long-term consequences for Pea Island National Wildlife Refuge (NWR). Our organizations believe that the "long bridge" alternative is the safest, most cost-effective, and environmentally sound of the alternatives under consideration. We would like to meet with you to discuss this situation at your earliest convenience.

As you may know, the Bush Administration acted earlier to block a proposed U.S. Army Corps of Engineers project to create massive stone jetties at Oregon Inlet which would have destroyed 93 acres of Cape Hatteras National Seashore and 33 acres of Pea Island NWR. We urge you to continue the Administration's strong record of protecting Pea Island NWR.

The North Carolina Department of Transportation (NCDOT) has determined that the Bonner Bridge needs to be replaced. A multi-agency team composed of both federal and state agencies, including the U.S. Fish and Wildlife Service (FWS), worked closely to formulate a number of alternatives for the bridge replacement. The long bridge alternative, which completely bypasses Pea Island NWR is the *only* alternative that is both compatible with the purpose of the refuge and provides long-term, safe, and reliable transportation. We urge you to ensure that the selected alternative protects the entire refuge over the long term, provides for safe and reliable transportation, and addresses the serious transportation safety and highway maintenance issues facing North Carolina state highway 12 (NC-12) through the refuge.

A number of alternatives have been proposed for the Bonner Bridge replacement. For all intents and purposes, two alternatives are being seriously considered at this point: a short bridge, which would parallel the existing bridge and would require relocating the existing NC-12 through Pea Island NWR south of the bridge landing on Hatteras Island and a long bridge, which would be a 17-mile causeway that would bypass the refuge in the Pamlico Sound and avoid important wildlife habitat as well. Importantly, the long bridge option would completely avoid vulnerable sections of NC-12 that routinely wash out during storms, effectively stranding Hatteras Island residents and visitors in dangerous conditions.

The existing transportation infrastructure on Pea Island NWR is quite complex and needs to be thoroughly considered in determining the appropriate long term transportation solution. Pea Island NWR is located on a dynamic barrier island that naturally shifts with storms, winds, waves, and currents. It has been extremely expensive and generally ineffective to implement artificial means of protecting NC-12 as it passes through the refuge because of this dynamic environment. There are three areas within the refuge that are considered highly vulnerable to

washouts, not only from storm events, but even springtime high-tide events, because of the road's proximity to the Atlantic Ocean. Millions of dollars are spent by NCDOT each year to remove sand from the road and maintain artificial dunes that are designed to keep the ocean at bay. In addition, millions more have been spent nourishing these three "hot spots" with dredged sand. This approach often leaves residents and tourists with no or limited access via NC-12, posing a real threat to their safety in the event of a hurricane evacuation.

Equally important for the management of the national wildlife refuge is the impact this ineffective infrastructure has on federally listed nesting sea turtles and nesting shorebirds and waterfowl habitat. Storm overwash areas form important wildlife habitat, particularly for the endangered piping plover. By continually bulldozing these over-wash zones, important wildlife habitat is destroyed. Additionally, storm overwash assists in the accretion of marsh habitat on the Pamlico Sound side of the refuge and maintains a low vegetative structure across the island, important for the refuge's wildlife. The maintenance of artificial dunes and the bulldozing of overwash zones prevents both of these important ecological processes from occurring. Refuge staff have struggled to develop methods for maintaining the proper array of vegetative habitat through use of prescribed fire and other means, but these methods have not been able to replicate natural conditions. The continual fight to preserve NC-12 from over-wash has seriously compromised the ability of Refuge staff to ensure proper marsh accretion, resulting in a diminution of the refuge's ecological integrity. Additionally, the constant use of bulldozers and dredge soil piping along the Pea Island beaches has greatly diminished the aesthetic experience for visitors to this natural treasure.

The combination of the above road maintenance requirements, the terminal groin installed to harden the north side of the island to protect the existing bridge, and other artificial means to protect transportation infrastructure have in fact had the *opposite* effect and have facilitated increased erosion. Pea Island NWR has lost approximately 1,000 acres since its establishment in 1938.

The bridge replacement must be viewed in a larger ecological and transportation context. This is why every agency involved in the project, including the North Carolina Department of Transportation (NCDOT) signed off on the long bridge alternative more than a year ago. The long bridge alternative and its raised causeway completely avoid all of these transportation and ecological problems. The long bridge alternative is safer, more reliable, cost effective, and most important for the refuge, environmentally sound and aesthetically compatible to the visitor experience. At public hearings held throughout the local area, citizens preferred the long bridge alternative by a 2-1 margin.

In July 2003, the North Carolina Department of Transportation (NC DOT), the Federal Highway Administration, and eleven other state and federal agencies with regulatory responsibilities unanimously agreed on the long bridge as the preferred alternative for the replacement of Bonner Bridge. This decision was based on an analysis of transportation reliability and safety, cost, and environmental impact. If the project had moved forward from this agreement, all permits would have been issued in May 2006 and construction of the replacement bridge could have begun this August. By contrast, one of the current proposals for the short bridge alternative, now called the "balanced" approach and favored by some political leaders in North Carolina, would require

additional study and delay, since it was not considered in the Supplemental Draft Environmental Impact Statement (SDEIS).

The landmark 1997 National Wildlife Refuge System Improvement Act strengthened the refuge system compatibility process. Any use of a refuge must be determined compatible, which is defined as not materially interfering with or detracting from the refuge's purpose or the refuge system mission. The refuge compatibility policy makes clear that the Department of Interior "must consider not only the direct impacts of a use but also the indirect impacts associated with the use and the cumulative impacts of the use when conducted in conjunction with other existing or planned uses of the refuge, and uses of adjacent lands or waters that may exacerbate the effects of a refuge use." 603 FW 2 of the Service Manual, Section 2.11B. In this case the refuge manager cannot simply evaluate the replacement of the bridge, but must consider the cumulative impacts of the entire transportation system, including the maintenance of NC-12 required in the short bridge alternative, on the refuge.

Compatibility is a fundamental tenet of wildlife refuge law. If this standard is weakened by poor decision-making at one refuge, it will affect the entire refuge system. Again, we urge you to protect Pea Island National Wildlife Refuge and the National Wildlife Refuge System by ensuring that the long bridge alternative is adopted. We hope you will be able to meet with us as soon as possible to discuss this important matter.

Sincerely,

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Defenders of Wildlife

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