September 29, 2025

COL Brad Morgan

District Engineer

USACE Wilmington District

69 Darlington Ave

Wilmington, NC  28403

Subject: Comments on Draft Wilmington Harbor 403 Letter Report and Draft EIS – Understated and Underserved Section 106 Historic Preservation and Environmental Justice

Dear COL Morgan

The importance of Section 106 Historic Preservation was clearly understated in the 203 Report.

The enslaved Gullah Geechee people played a crucial role in the growth of Wilmington's port and economy, arriving through its docks, working in maritime industries, and contributing to the city's infrastructure. The modern port facility was established in the 1920s; however, enslaved people had contributed to the city's success as a port for centuries prior.  Yet, this vital moment in the Port’s history was completely ignored in the Port’s Section 203 report. To fully document the Port’s history over the centuries, records must include those who toiled with backbreaking work to put the Port on our Nation’s map.

During the 18th and 19th centuries, enslaved Black people performed much of the port labor. They worked as stevedores, boatmen, and pilots on the Cape Fear River and were involved in ship-related trades.  Some enslaved pilots, like the engineer Peter mentioned in David Cecelski's book The Waterman's Song, used their skills to help other enslaved people escape via maritime routes.

The port's prosperity depended heavily on exports driven by enslaved labor. This included naval stores like tar, pitch, and turpentine, which were crucial for shipbuilding, as well as agricultural products like rice and indigo.  Enslaved people worked year-round in these industries, and the region's top enslavers, such as William Dry and Richard Quince, were powerful merchants who profited from their labor.

Enslaved Black people were the primary workforce for much of Wilmington's construction and foundational infrastructure. In the 19th century, enslaved labor was rented out for construction projects. Prominent buildings like the Bellamy Mansion and Thalian Hall/City Hall, both built in the 1850s, relied on enslaved labor.

Wilmington was a primary port of entry for the slave trade, where enslavers brought captive Africans to North Carolina. Newspaper ads regularly announced slave auctions on the steps of the New Hanover County courthouse.

After the Civil War, formerly enslaved Black people moved to Wilmington to seek work and community. By 1898, Black residents were a significant part of the city's professional and skilled workforce, holding jobs as craftsmen, business owners, and government officials.  However, Black economic success was targeted during the 1898 Wilmington Massacre, a violent white supremacy coup that overthrew the city's elected government and drove many Black citizens out of their homes and businesses. The legacy of slavery and the massacre is now recognized in sites throughout the city, including the 1898 Memorial Park. The modern Port of Wilmington, dedicated in 1952, was built after this era but stands on the foundations laid by the generations of enslaved people who preceded it.

Preserving, protecting, and celebrating the history, culture, and heritage of past generations who lived, worked, and connected their very existence to our Lower Cape River should have been a key part of the 203 Report. The existence of the Port of Wilmington and the wealth gained from developing the port were built on the backs of enslaved West Africans.

In 2006, Congress recognized the contributions of the Gullah Geechee by creating the Gullah/Geechee Cultural Heritage Corridor (Public Law 109-338), also called the Gullah/Geechee Cultural Heritage Act, which Congress enacted on October 12, 2006. Congress designated the Gullah Geechee Corridor as a National Heritage Area, one of fifty-five (55) authorized heritage areas nationwide. The geographic areas of New Hanover and Brunswick Counties, along with the entire lower section of the proposed dredging project in the Cape Fear River, are entirely within that corridor.

The Corridor was established to acknowledge, support, and celebrate the significant contributions of African Americans, particularly the Gullah Geechee, who settled in the coastal counties of South Carolina, Georgia, North Carolina, and Florida. It also seeks to assist federal, state, and local governments, as well as public and private organizations in these states, in interpreting and preserving the history of the Gullah Geechee. This includes protecting Gullah Geechee folklore, arts, crafts, and music, as well as identifying and safeguarding sites, historical records, artifacts, and items related to Gullah Geechee people and culture for public education and benefit. However, the Port’s Section 203 Report largely neglects this history.

Thinking of opportunities for mitigation, the Eagles Island area is well-documented as having significant historical and cultural heritage value. There is an exceptional opportunity to preserve, protect, and celebrate the history, culture, and heritage of Gullah Geechee people and their connection to the Lower Cape Fear River. Eagles Island first appeared on North Carolina maps in 1671, known then as Cranes Island. Located at the confluence of the Cape Fear and Brunswick Rivers, Eagles Island has been a vital ecological asset for our riverine system and a centerpiece of the region's dynamic cultural history.

Eagles Island Nature Park presents a rare chance to develop a world-class park. The timing couldn't be better: the region has two of the fastest-growing populations in the United States, with increasing interest and need to learn about our history and those who were a vital part of it.

Establishing Eagles Island Nature Park as part of the Port’s mitigation plan investment would enhance the area’s reputation as a coastal destination with rich historical significance. Residents and visitors can easily access it, and it’s a place families will want to visit. Walking paths, marsh boardwalks, bike trails, birdwatching, kayaking, a harbor loop, and an exhibition and education center will celebrate the people and stories that have shaped a nation, as well as a key trail connection, the recently state-authorized North Carolina Gullah Geechee Heritage Trail along the Cape Fear River in Brunswick County.

It is critically important, now more than ever, for USACE and the federal government to develop more sustainable solutions for protecting and preserving our environment, history, culture, and heritage within and around the study area. Thank you for allowing me the opportunity to comment on this crucial endeavor. Thank you.

Essayons,

//signed//

Brayton Willis

USACE Senior Project Manager, Retired

P.O. Box 2135

Leland, NC  28451