

COL Brad Morgan
District Engineer
USACE Wilmington District
69 Darlington Ave
Wilmington, NC 28403

Dear COL Morgan,

Question: Why were the secondary and/or direct impacts upon the culturally significant North Carolina Gullah Geechee Blueway Trail intentionally or inadvertently omitted in the USACE Draft Environmental Impact Statement (DEIS) or the Port of Wilmington's 203 Report in direct violation of the National Environmental Policy Act (NEPA)?

The North Carolina Gullah Geechee Greenway Blueway Heritage Trail aims to further preserve, protect, and honor the culture and heritage of the Gullah Geechee people and their vital connection to the Lower Cape Fear River area through active community involvement in developing and maintaining a 30-mile Heritage Trail. This trail is a key part of the Cape Fear River reach that extends several miles above the Port of Wilmington to its end in Southport.

The blueway route connects many historic features along the Cape Fear River coastline, helping ensure that the contributions of the Gullah Geechee people to their language, customs, and crafts are appropriately recognized and celebrated. At Eagles Island, the blueway trail winds its way in and around miles of paddle trails surrounding the proposed Eagles Island Nature Park and the maze of interior creeks and canals, which affords immersive access to the site's natural landscape and history while also connecting to existing local and regional blueway networks.

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.

Deepening the Cape Fear River will negatively impact our culturally significant, state-established North Carolina Gullah Geechee Blueway portion of our trail by increasing saltwater intrusion, worsening erosion, and degrading water quality, thereby threatening sensitive habitats. These changes will dramatically harm wildlife, alter shorelines, and create larger wakes from larger ships, making many areas less suitable for recreational kayaking and canoeing, while damaging sensitive and culturally significant artifacts hundreds of years old.

Potential negative impacts on our blueway trail:

- **Increased erosion could harm historic and culturally significant sites:** The project might accelerate shoreline and wetland erosion, potentially impacting trail access points and scenic views, and damaging artifacts of cultural significance already identified by researchers.
- **Habitat degradation:** Deepening the Cape Fear River will likely cause more saltwater to intrude further upstream, changing freshwater wetlands into saltwater wetlands. This can

kill freshwater-dependent trees and alter habitats that support fish, birds, and other wildlife that are often part of the blueway experience.

- **Larger wakes:** If the river is deepened to accommodate larger ships, the wakes from these vessels will increase, leading to more significant wave action that can damage shorelines and pose a risk to smaller craft on the blueway trails.
- **Reduced water quality:** The deepening project will significantly degrade water quality, which can harm the visual appeal and safety of those enjoying the blueway.
- **Changes to marine life:** The estuary is a nursery for juvenile fish, crabs, and shrimp, so changes to salinity and habitat could have a significant impact on the marine life that recreational users may want to observe.

This Blueway Trail is entirely within the Gullah Geechee Cultural Heritage Corridor, located along the Lower Cape Fear River. The Corridor itself is a National Heritage Area established by the U.S. Congress to honor the unique culture of the Gullah Geechee people, who have historically resided in the coastal regions and sea islands of North Carolina, South Carolina, Georgia, and Florida. Visit us to learn more about the Gullah Geechee community and its distinctive culture.

While some citizens of the lower Cape Fear region are generally familiar with Gullah Geechee people and their important links and contributions to the Lower Cape Fear River, many local residents, especially newcomers, do not understand who the Gullah Geechee people were or the role they played in shaping the history, culture, and early economy of this area. This trail aims to bring together and build upon the various efforts and reports that have established a vital foundation for cultural, historical, and ecological work, all designed to enhance our understanding and appreciation of the past, present, and future of Gullah Geechee culture in the lower Cape Fear region.

This trail will greatly support marginalized communities who, for years, have faced environmental and health issues caused by industrial contamination, including climate change. We volunteer because we care for our children, grandchildren, and future generations, leaving a legacy of character, resilience, and faith.

The specific goals of this Trail are:

- **Educational Outreach:** Increasing a local, regional, and nationwide understanding and awareness of Gullah Geechee people, culture, and history.
- **Support for tourism and businesses:** promoting the preservation of the land and natural resources leads to meaningful, healthy ways of life and a sense of place.
- **Social Inclusion:** Recognition and participation of stakeholders and vulnerable groups are key components of our community workshop efforts. Focusing on historically marginalized communities, this effort will bring their influence in the decision-making process by providing a seat at the table.
- **Documentation and preservation of historic places:** connecting and bonding our residents and visitors to the fabric of our society by preserving, celebrating, and providing access to them.
- **Environmental protection of our essential natural landscape,** giving necessary links between our fragmented local habitats, and offering tremendous opportunities to protect our ecosystems, wetlands, and floodplains.

Within the expansive landscape of longleaf pines and ancient cypress trees, the empty fields and swamps were once plied by enslaved West Africans to satisfy the relentless pursuit of profit gained from their labor. Fast forward to today, and this persistent and unfortunate greed persists, though in a different form. It now feeds off the wallets of those who move here, who blindly alter the composition of our southern soils and beautiful rivers. And, sadly, we emigrants and migrants to this land, along with the greedy among us, have changed our earth and the spaces we now occupy, not for the better, but in the image we mistakenly believe is better. Within that false belief lies a profound, irreparable loss to our environment, our citizens, and our future.

The significance of Section 106 Historic Preservation was clearly underestimated in the recognition and mitigation efforts in the USACE DEIS and the Port's Section 203 Report. We look forward to your acknowledgment of our community-wide efforts, as well as those representing the Gullah Geechee Corridor, in your updates of the DEIS.

Thank you.

//SIGNED//

MS Veronica Carter

Chairwoman,

North Carolina Gullah Geechee

Greenway Blueway Heritage Trail

PO Box 1372

Leland, NC 28451