17 November 2025

US Army Corps of Engineers
Wilmington District
ATTN: Wilmington Harbor 403
69 Darlington Avenue
Wilmington, NC 28403
WilmingtonHarbor403@usace.army.mil

Re: Limited Ext of Comment Period Wilmington Harbor 403 DEIS

To whom it may concern,

Audubon North Carolina and the North Carolina Coastal Federation appreciate the opportunity to provide these supplemental comments on the Draft Environmental Impact Statement (DEIS) for the Wilmington Harbor 403 Dredging Project. We acknowledge the limited extension granted by the U.S. Army Corps of Engineers (Corps) to allow for the submission of additional published scientific data and reports relevant to Wilmington Harbor that were not incorporated into the DEIS.

Background and Available Resources
A previous Wilmington Harbor deepening and widening project was completed under the 2000 Environmental Impact Statement (EIS). Following that project, a monitoring plan was developed and implemented to evaluate physical, ecological, and sediment transport changes within the estuarine system.

The datasets, analyses, and reports generated through that monitoring effort remain available to the public and provide a valuable foundation for understanding long-term system responses to channel modifications. These materials have been compiled on the University of North Carolina Wilmington website, here: https://people.uncw.edu/culbertsonj/.

Questions and Data Gaps
We request clarification on the following points:

1. Review of Existing Data: Did the Corps review and incorporate the available post-project monitoring data and associated scientific reports from the previous Wilmington Harbor deepening and widening project in preparing this DEIS?
2. Monitoring Plan: The current DEIS does not appear to include a monitoring or adaptive management plan. Why was such a plan not developed for this project, given the substantial precedent for doing so and the lessons learned from the 2000 project?
3. Future Monitoring: Will a comprehensive monitoring plan be developed for this project, and if so, who will be responsible for conducting and funding the monitoring activities?

Evaluation of Impacts and Mitigation Commitments
The 2000 EIS did not accurately capture the full range of ecological and geomorphological impacts that followed the prior deepening and widening of Wilmington Harbor. Documented effects included unanticipated changes to salinity gradients, tidal dynamics, inundation periods, sedimentation patterns, and overall habitat conditions.

Past monitoring identified shallow-margin habitats, including tidal marsh edges, tidal creek complexes, creek mouths, and tidal swamps, as particularly vulnerable to shifts in inundation, tidal amplitude, and saltwater intrusion. Within the Cape Fear River estuary, these habitats are recognized by state and federal agencies as essential for multiple priority species.

High-profile species such as Atlantic and Shortnose Sturgeon, Striped Bass, and several flounder species remain of significant management concern. Their populations are currently the focus of extensive state, federal, and philanthropic research and recovery efforts. Notably, the Cape Fear Partnership has undertaken a long-term, collaborative initiative to restore migratory fish populations as part of the ongoing lock and dam removal and fish passage work upstream. These investments aim to reestablish access to historic spawning grounds and rebuild severely depleted stocks. Any project-related degradation of estuarine habitats, or impacts to prey species supporting these fish, could undermine these recovery efforts and trigger population-level consequences well beyond the Cape Fear River.

The Cape Fear River estuary also contains extensive areas of uniquely sensitive habitat complexes designated as Strategic Habitat Areas, Region 4 (https://www.deq.nc.gov/about/divisions/marine-fisheries/habitat-information/coastal-habitat-protection-plan/strategic-habitat-areas). These areas have been identified due to their ecological importance, limited extent, and heightened need for protection. Further alteration of hydrology or salinity regimes threatens the integrity of these habitats and the species that depend on them.

Given that history, it is essential that the Corps clearly identify:

- How unanticipated or underestimated impacts will be detected under this new project;
- What corrective actions will be taken if adverse impacts exceed those predicted in the DEIS; and
- Who will be responsible for funding those actions.

Without a clear monitoring and adaptive management framework, there is no mechanism to ensure accountability or to prevent the repetition of previous shortcomings in impact assessment and mitigation.

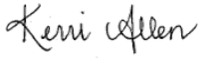
Conclusion
We urge the Corps to review and incorporate the full suite of existing monitoring data from the previous Wilmington Harbor project, to develop a robust monitoring and adaptive management plan for the current proposal, and to clearly identify both the responsible

parties and funding mechanisms for any required corrective actions. These steps are critical to ensuring that project impacts are fully understood, minimized, and effectively managed over time.

We appreciate the Corps' willingness to extend the comment period for this purpose and look forward to a transparent and scientifically grounded evaluation process.

Sincerely,

Lindsay Addison,
Audubon North Carolina



Kerri Allen,
North Carolina Coastal Federation