



NEW HANOVER COUNTY

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October 31, 2025

Attention: Wilmington District, US Army Corps of Engineers

Subject: Wilmington Harbor 403
Draft Letter Report and Environmental Impact Statement
New Hanover County Comments

Via: WilmingtonHarbor403@usace.army.mil

Dear U.S. Army Corps of Engineers,

New Hanover County thanks the U.S. Army Corps of Engineers' (Corps) for the opportunity to review and provide comment on the Draft Environmental Impact Statement (EIS) for the Wilmington Harbor Navigation Improvement Project.

The County values the Corps' longstanding partnership in supporting navigation, economic activity, and coastal protection in the Cape Fear region. We also recognize the significant effort that went into preparing this document, particularly the integration of climate-aware modeling, habitat impact analysis, and mitigation planning that consider both environmental and community resilience. The County also recognizes and supports the waterborne commerce that the North Carolina State Ports Authority (NCSPA), specifically the Port of Wilmington, brings to New Hanover County and the surrounding region.

We further appreciate the Corps' and NCSPA's commitment to collaboration with local governments and stakeholders throughout this process. This approach reflects the shared goal of balancing economic growth, navigation safety, and environmental stewardship in a rapidly changing coastal system.

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The County's comments below are intended to support that shared goal by identifying opportunities for improved alignment with New Hanover County's Strategic Plan (FY 2024–2028), specifically the focus areas of Sustainable Land Use & Environmental Stewardship and Community Safety & Well-Being.

The following comments are offered as early feedback to inform the Corps' continued evaluation and refinement of the project.

Inclusion of Kure Beach for Beneficial Reuse of Beach Compatible Material

The County strongly supports the use of beach compatible material for beneficial reuse on the County's beaches and as a potential sand source for the County's successful Coastal Storm Risk Management (CSRM) projects. While the current draft EIS includes Carolina Beach and Masonboro as a potential option for beneficial reuse, the County asks that the inclusion of Kure Beach be investigated further. It is the County's understanding that in 2001, as part of a Wilmington Harbor Deepening project, the middle reaches of the Cape Fear River (specifically PA-4, formally known as CDF-4), were used as a sand source for Kure Beach's CSRM project. The County understands while these options may not be currently economically feasible, there may be the option for use during O&M in the future as they were used previously.

Aquifer Protection

The County acknowledges the findings of the Draft EIS that model results indicate the potential channel deepening would not introduce new flows of salinity into the area's aquifers. Given the sensitivity and importance of these aquifers as potable water, the County continues to encourage the protection and monitoring of these aquifers for any potential saltwater intrusion caused by the channel deepening that may not have been captured in the Draft EIS models.

Localized Mitigation

The County encourages the Corps to ensure that a portion of compensatory mitigation occurs within New Hanover County, particularly in areas directly affected by project impacts. This approach supports the County's *Responsible Stewardship* goals by ensuring that mitigation efforts are locally beneficial, environmentally effective, and fiscally responsible.

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The County further recommends that high-quality, ecologically valuable sites, such as NC Natural Heritage Program areas and other conservation lands, not be eliminated from consideration solely due to tentative or proposed development plans (M-24, 9.1.11). Coordination with County staff can help confirm the current status of nearby projects and ensure that viable mitigation opportunities are fully considered.

To support site selection, the County encourages the Corps to cross-reference the County's Comprehensive Plan and Future Land Use Map to identify areas designated as "Conservation." These areas represent locally recognized priorities for preservation, restoration, and ecosystem function and should be carefully considered when identifying or refining potential mitigation locations.

Invasive Species Removal and Ecological Effectiveness

The County asks that the proposed Phragmites removal at Eagles Island and Alligator Creek (M-23, 9.1.8; Appendix M) be evaluated further. Past restoration projects in southeastern North Carolina have shown limited long-term success with Phragmites removal due to its ability to reproduce and disperse via floating fragments even when physically isolated by infrastructure or hydrologic barriers.

Given these challenges, the County encourages the Corps to reassess the long-term effectiveness and cost-benefit ratio of this measure. Mitigation actions should represent a responsible and accountable use of resources, which would be consistent with the County's commitment to environmental stewardship and good governance.

The draft EIS could also benefit from additional details on the public and private partnerships or sponsors responsible for long-term management of this mitigation site. Clear identification of responsible parties and maintenance commitments is critical to ensuring ecological success over time.

While the County is not proposing a specific alternative technique, we encourage the Corps to consider whether Phragmites management could be coupled with hydrologic or habitat restoration activities such as enhancing tidal flow or selective excavation to improve long-term ecological outcomes in a manner consistent with restoration success observed elsewhere in coastal North Carolina.

Overall, the County recommends that mitigation and restoration measures be designed to provide durable, tangible benefits for both the environment and the community.

Sediment Contamination and Public Health

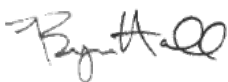
The County requests that sediment contamination be considered and investigated prior to the placement of any beneficial reused dredge material (2-14, Section 2.8; Appendix D). Given known PFAS and other contaminant concerns within the Cape Fear River Basin, comprehensive testing and transparent reporting are essential to protect public health and environmental quality.

The County strongly supports the beneficial reuse of clean dredged material. Given the concern around contaminant concerns within the Cape Fear River Basin, rigorous sampling protocols and clear public communication regarding sediment characterization could ensure that residents and downstream users are not exposed to harmful contaminants. These considerations directly align with the *Community Safety and Well-Being* goals of the County's Strategic Plan.

Conclusion

New Hanover County understands the importance of the NCSPA, Port of Wilmington, and Wilmington Harbor to the County and southeast North Carolina. The County values the Corps' commitment to transparent, science-based environmental review and supports mitigation strategies that provide durable ecological and community benefits. As the project advances, the County welcomes continued coordination to ensure alignment with our adopted Strategic Plan and the long-term sustainability and safety of our coastal region.

Sincerely,



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