



◊ North Carolina Wildlife Resources Commission ◊

Gordon Myers, Executive Director

MEMORANDUM

To: Frank Yelverton
Project Manager
Wilmington District, U.S. Army Corps of Engineers

From: Molly Ellwood
Southeastern Permit Coordinator
N.C. Wildlife Resources Commission

Date: November 24, 2009

Re: Reconnaissance Analysis for the North Carolina International Terminal, Brunswick County.

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the information provided concerning the proposed project. Our comments are provided in accordance with certain provisions of the North Carolina Environmental Policy Act (G.S. 113A-1 through 113A-10; 1 NCAC 25) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661et seq.).

The North Carolina Ports Authority has begun to release documents for a new North Carolina International Terminal (NCIT) on a 600 plus acre site near River Mile 7.0 on the Cape Fear River in Brunswick County. The Infrastructure Report and a Conceptual Dredging Study have been released for preliminary review and address the multiple needs for dredging, roadways, and rail lines needed to facilitate an international terminal that can support a maximum capacity of 1.5 million 20 foot truck equivalent Units (TEU). In order to accommodate the large ships and increased demands, the current navigation channel that connects the Cape Fear River to the Atlantic Ocean may need to be deepened and realigned. New roadway systems and rail lines are also proposed to handle the increase in truck and rail traffic. A new four lane highway is proposed to connect the site, north of Southport to Highway 17. No wetland impacts have been discussed, nor have any mitigation measures be mentioned in either document.

The NCWRC has the following concerns and recommendations:

- Footnote number 7 of the Infrastructure Report states, "To date, no environmental fatal flaw has been brought forth which will fundamentally jeopardize the project." There has been minimal input from the commenting agencies regarding environmental impacts associated with this project. Significant environmental effects are anticipated as a result of this project. The NCWRC feels it is premature to make predictions about project feasibility at this point.

- Container ships utilizing the NCIT would require the navigation channel in the Cape Fear River to be deepened and realigned to accommodate larger ships. The Conceptual Dredging Study discusses the potential for straightening the channel by removing islands and shoals within the Cape Fear River. These islands are important for many avian species, including herons, shorebirds, wading birds, and colonial nesting birds. Dredging adjacent to these islands could result in significant, adverse impacts to the bird populations known to use these islands. Plans to avoid and minimize impacts to these islands should be explicitly outlined in any future documents pertaining to channel realignment for this project.
- The Army Corps of Engineers is required to mitigate for past impacts within the Cape Fear River for the Wilmington Harbor Project. Please provide more information as to how these obligations will be fulfilled prior to any new impacts within the Cape Fear River.
- Figure 1-2 of the Infrastructure report shows the full build out of the project area. The entire shoreline has multiple types of infrastructure. The site contains a significant amount of wetlands, mainly within the AEC along the Cape Fear River. The document does not discuss expected wetland impacts, wetland avoidance and any potential mitigation. Wetlands serve an important role in maintaining water quality and provide habitat for many important wildlife and fish species. Wetland impacts should be addressed with respect to the complete build out of the proposed project.
- Significant impervious surfaces associated with the project will result in the potential for direct stormwater run off into the Cape Fear River. Due to the loss of the natural filtering system that wetlands provide, this water will likely carry harmful contaminants. Please provide clearer maps that show stormwater controls and discuss measures that will protect water quality of the Cape Fear River and the important shellfish beds and fish species in the project vicinity.
- The Infrastructure Report states that upwards of 1,550 trucks could be loaded per day from the container ships utilizing the NCIT and would use existing and new roads. Twenty miles of new, four-lane, highway is discussed, but the alignment of this road and the connection to US 17 has not been discussed. The new roadways potentially will have significant direct and indirect impacts to important wetlands. There are multiple ecologically sensitive areas in the project vicinity, including the Green Swamp. The NCWRC recommends that impacts to these important areas be avoided.

Thank you for the opportunity to review and comment on this project during its preliminary scoping stages. Please feel free to contact me at (910) 796-7240 if you have any questions or concerns.

ec: David Allen, NCWRC
Matthew Godfrey, NCWRC
Bennett Wynne, NCWRC
Tom Padgett, NCWRC
Heather Coats, NCDWM
Richard Carpenter, NCDMF
Chad Coburn, NCDWQ
Howard Hall, USFWS