



North Carolina Department of Environment and Natural Resources

Division of Marine Fisheries

Dr. Louis B. Daniel III

Director

Dee Freeman

Secretary

Beverly Eaves Perdue
Governor

November 16, 2009

Colonel Jefferson M. Ryscavage
District Commander/District Engineer
Wilmington District, U. S. Army Corps of Engineers
69 Darlington Avenue
Wilmington, North Carolina 28403

Subject: Reconnaissance Study for the North Carolina International Terminal, Brunswick County, North Carolina, Attention: Frank Yelverton

Dear Colonel Ryscavage:

The Wilmington District, U. S. Army Corps of Engineers (Corps), has requested comments for a Reconnaissance Analysis (RA) on the proposed North Carolina International Terminal (NCIT) which would be located on the lower Cape Fear River in Brunswick County, North Carolina. The Division of Marine Fisheries has reviewed information from the Corps as well as an infrastructure report from CH2M Hill that was prepared for the North Carolina Ports Authority in 2008. The DMF offers the following comments based on the information from these two sources. Our comments focus on the potential effects of the proposed realignment and deepening of the ship channel and construction of the berthing area on the marine and estuarine resources of the lower Cape Fear River (CFR) and nearshore Atlantic Ocean.

The Division prepared a Coastal Habitat Protection Plan (CHPP) in 2005 which offers a detailed description of habitat types in North Carolina and an extensive literature review of these habitats and threats to them. Six habitat types were identified in the CHPP, the water column, shell bottom, submerged aquatic vegetation (SAV), wetlands, soft bottom and hard bottom. Of the six, all but SAV are found in the area proposed to be developed for the port.

The water column is important for the migration, transport and maintenance of life history stages of all marine and estuarine species found in the CFR and the Atlantic Ocean. Fish such as American shad, striped bass and sturgeon use the water to migrate to spawning areas upstream in the CFR and as a route for their offspring to return to the Ocean. Other species such as southern flounder, shrimp and blue crab depend on the water column for transport of their larvae from the lower CFR and nearshore Ocean to their nursery areas in the CFR. Increases in pollutants and turbidity associated with construction of the channel and operations at a port will cause disruption of these functions.

Shell bottom habitat is found throughout the proposed alignment of the ship channel from the mouth of the Cape Fear to the terminus at Snows' Marsh. Particularly important are intertidal populations of oysters and sub-tidal populations of hard clams which would be destroyed if the proposed alignment were constructed.

Coastal wetlands are found on the islands of the lower part and west bank of the CFR and in Snows' Marsh. These areas will either be directly impacted by dredging and shoreline stabilization or indirectly impacted by increased erosion of wetlands adjacent to the proposed development from the increased ship traffic.

Soft bottom habitat is found in both the CFR and nearshore Atlantic Ocean. Important functions of shallow soft bottom are as a nursery for juvenile finfish, shrimp and crab populations and as a foraging area for juvenile and adult life history stages of these populations. Deepening and dredging of these areas will destroy the nursery function of the shallow soft bottom habitat as well as populations of forage species such as polychaete worms, amphipods and hard clams.

Hard bottom habitat is also found in the CFR and nearshore Atlantic Ocean. In the Ocean it is important for juvenile and adult snapper, grouper and other marine species for protection and as a forage area. Deepening of the channel will destroy any hard bottom habitat in the alignment of the channel.

Our comments are extremely brief as there was very little detail in the Corps' request for comment on the RA and DMF had to rely on information obtained from other sources. If the project were to go forward as presented in the CH2M Hill report there will be significant adverse impacts to the habitat and biota of the CFR and nearshore Atlantic Ocean. Thank you for the opportunity to comment if you need additional information please contact me.

Sincerely,

Rich Carpenter
District Manager
N. C. Division of Marine Fisheries