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NORTH CAROLINA
Environmental Quality

November 3, 2025

U.S. Army Corps of Engineers
Wilmington District
69 Darlington Avenue
Wilmington, NC 28403

Sent via email on November 3, 2025 to WilmingtonHarbor403@usace.army.mil

RE: Wilmington Harbor 403 Project

Thank you for the opportunity to provide comments on the U.S. Army Corps of Engineers' Draft Letter Report (LR) and Environmental Impact Statement (DEIS) for the Wilmington Harbor 403 Project.

The N.C. Coastal Reserve and National Estuarine Research Reserve (Reserve) is a program of the Division of Coastal Management (Division) and protects over 44,000 acres of coastal and estuarine habitat across 10 sites along N.C.'s coast to preserve representative coastal habitats for research, education, and compatible traditional uses including recreation. Two of these sites, [Masonboro Island Reserve](#) and [Zeke's Island Reserve](#), are located within New Hanover and Brunswick Counties and are within the vicinity of the proposed Wilmington Harbor Project. Both reserves are designated as part of the N.C. National Estuarine Research Reserve which is managed as a state-federal partnership between the Division and the National Oceanic and Atmospheric Administration (NOAA) as part of NOAA's National Estuarine Research Reserve System. As such, the Masonboro Island and Zeke's Island Reserves are considered NOAA trust resources. Both the Masonboro Island and Zeke's Island Reserves are State Nature Preserves dedicated by the N.C. Natural Heritage Program through the N.C. Council of State per G.S. 143-260.6 et seq. The Masonboro Island and Zeke's Island Reserves are owned by the State of N.C. and management of the sites is delegated by the State to the Division.

Masonboro Island Reserve has been identified in the LR and DEIS as a proposed Beneficial Use site, for both intertidal placement and beach nourishment (Letter Report pp. 3-5:3-7; DEIS pp. 2-14:2-19).

- Intertidal placement: The Reserve has questions regarding the location and concerns regarding the lack of detail on placement methods and sediment compatibility for the proposed intertidal placement at the Masonboro Island Reserve one mile back barrier area (Appendix D. Section D.6.9, pp. 27-28). More information is needed to determine



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whether the Masonboro Island Reserve will benefit from placement of material in this location, such as detailed habitat change and elevation analyses and modeling of future conditions that include sea level rise projections. The proposed intertidal placement area is characterized by shallow, non-maintained navigational creek systems, mud flats, marsh and shellfish beds; placement of material in this area has the potential to negatively impact the health and success of shellfish and impede public access and navigation to the area. Intertidal placement at this location is not currently allowed per the terms and conditions of the Masonboro Island Reserve State Nature Preserve dedication letter; an amendment to the dedication letter would likely be needed to allow such an activity via the process defined in 07 NCAC 13H .0300-.0306. Additionally, placement would require approval by the Reserve and compliance with all federal and state laws, rules and regulations to minimize impact to the environment. Therefore, the Reserve requests additional information that details how the placement area was identified and why, proposed methods for placement, and how sediment compatibility and possible contaminants will be evaluated in order to further consider this proposal.

- Beach nourishment: Beach nourishment is proposed along the eastern side of the island at the Masonboro Island Reserve (Appendix D. Section D.6.9, pp. 27), which may help offset alterations to the island's sand budget from the sand deficit caused by the rock jetty on the northern end of the island at Masonboro Inlet and reduce net coastal erosion. Beach nourishment is permissible per the State Nature Preserve Dedication letter if the Reserve, N.C. Natural Heritage Program, and other resource agencies deem it to be beneficial and are involved in the planning process. Some elements of biodiversity, habitat, and species nesting may be sensitive, and project monitoring is recommended. Additionally, current and future research and resilience planning conducted by Reserve staff, researchers and other partners has the potential to better inform specific placement location along the ocean beach to address the impacts described above. Current data suggest that a larger beneficial use area, stretching 5-6 miles north along the beach front from the southernmost point of the yellow polygon in Figure D-13, may also benefit from beach nourishment. This expanded area includes the majority of the ocean beach at Masonboro Island Reserve, excluding the most northern and southern tips, where sediment placement may not benefit the natural long-shore transport of sediment. Therefore, the Reserve requests to meet with the Corps to refine the geographic area designated for beach front deposition to best suit future deposition needs which will likely be refined and informed by pending research.

Placement of any material at the Masonboro Island Reserve for beneficial use requires agreement by the State of N.C. and a Right of Entry to the site issued by the State Property Office. It is requested that the Corps contact the Reserve with significant advance notice if a deposition project at Masonboro Island Reserve is considered, as the Reserve will advise on feasibility and the most appropriate location(s) for placement based on current habitat resilience goals.



Zeke's Island Reserve is situated along the east bank of the Cape Fear River between Fort Fisher State Park to the north and the Smith Island Complex to the south. The site hosts a historical feature, commonly referred to as "the rocks", that was constructed in 1881 by the U.S. Army Corps of Engineers to reduce shoaling in the Cape Fear River and has created a lagoon-like complex at the site. Zeke's Island Reserve is comprised of 1,635 acres of upland maritime shrub thicket, intertidal, and creek systems. This site hosts many foraging, migratory, and nesting species including federally protected and threatened species such as loggerhead and green sea turtles and red knots. The proposed project could result in salinity regime shifts causing impacts to both upland and intertidal habitats, including areas within the Zeke's Island Reserve that are designated Primary Nursery Area (PNA) by N.C. Division of Marine Fisheries. The Reserve conducts long-term water quality monitoring within the Zeke's Island Reserve as part of the [NERRS System-Wide Monitoring Program](#); this 20+ year dataset provides an excellent opportunity to monitor changes at the site if the project is constructed. These data, combined with recommended salinity and habitat monitoring throughout the project area, will be necessary to understand project impacts to the Cape Fear River and the Zeke's Island Reserve.

The Reserve respectfully requests the Corps address these comments and concerns during their revision of the draft LR and DEIS in acknowledgement of the state and federal investments in these public trust resources, the purposes of the Masonboro Island and Zeke's Island Reserves, and the habitats, species, and uses protected therein.

Please contact me regarding any questions or information needs you may have at 252.515.5438 or Rebecca.Ellin@deq.nc.gov.

Sincerely,



Rebecca Ellin
Coastal Reserve Program Manager

cc:

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