



**North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Josh Stein
Secretary Pamela B. Cashwell

Office of Archives and History
Deputy Secretary Darin J. Waters, Ph.D.

October 30, 2025

Bret L. Walters
Chief, Planning and Environmental Branch
U.S. Army Corps of Engineers
Wilmington District
ATTN: Wilmington Harbor 403
69 Darlington Avenue
Wilmington, NC 28403

WilmingtonHarbor403@usace.army.mil

Re: EISX-202-00-K7P-1755163795, Wilmington Harbor 403 Letter Report and Environmental Impact Statement, Brunswick and New Hanover Counties, North Carolina, ER 23-1299

Dear Mr. Walters:

Thank you for your September 18, 2025, letter transmitting the draft Letter Report and draft Environmental Impact Statement (DEIS) for the Wilmington Harbor 403 project. We have reviewed the materials submitted, including the proposed draft Programmatic Agreement (PA) between the US Army Corps of Engineers (USACE), the General Services Administration and the North Carolina State Historic Preservation Officer for the proposed undertaking and offer the following comments.

We appreciate that, as part of the DEIS, the USACE undertook studies concerning the presence of historic properties that may be affected by the proposed deepening of Wilmington Harbor as these studies provide a basis to better understand the potential effects of the proposed deepening and widening of the navigation channel. However, in doing so, while the USACE's studies appear to have focused solely on the physical impacts of dredging the river-bottom, placement of dredged materials, and locations of mitigation measures, we believe from nearly two decades of observation and monitoring erosion at historic properties along the channel that we can expect other effects will result from the proposed project. Consequently, while we are willing to concur with the USACE that the project may have an adverse effect on the listed properties, we believe that there are many more historic properties that may be adversely affected by the proposed undertaking and that the direct and foreseeable outcome of the proposed deepening will be ongoing effects to historic properties attributable to the need to routinely dredge to maintain the proposed new depth and width of the channel.

Given our findings and insights, we wish to enter into a Programmatic Agreement with the USACE so as to address effects on known and potentially National Register-eligible historic properties to be adversely affected by the proposed undertaking and the regularly scheduled maintenance dredging, spoil placement, and environmental mitigation measures following the proposed undertaking. To that end, in anticipation of more detailed comments/edits on the proposed PA, we offer the following as starting points for consideration in development of the PA:

Scope of the project:

If the proposed undertaking is funded, on-going dredging and disposal of dredged materials will be necessary. Thus, the PA should address how to monitor and mitigate the effects of the undertaking into the future for any historic properties adversely affected.

Area of Potential Effects:

Based on the map for the proposed Area of Potential Effects (APE), the boundaries appear appropriate, except for Fort Caswell's appearing to be excluded. Thus, we want to discuss the proposed APE map in greater detail with you to confirm that all the sites/properties we are concerned about will or may be affected by the undertaking are indeed included.

Signatories:

As noted in the draft PA, signatories should include the USACE, North Carolina State Historic Preservation Officer (NCSHPO), and the General Services Administration (GSA). The National Park Service (NPS), in accordance with Section 110 of the National Historic Preservation Act, should also be invited as a signatory in that Fort Fisher and the USS North Carolina are National Historic Landmarks.

Consulting Parties:

We understand that the USACE believes that it has provided adequate notice and information to Tribes and potentially affected property owners so that they may comment on the undertaking. However, from our discussions with several property owners we believe that additional owners need to be included and invited to join in the development of the PA as Consulting Parties. A list of the owners and the historic sites and/or properties for which they may have concern are as follows:

Historic Properties within the Area of Potential Effects

Oak Island Lighthouse (BW0260) NRHP
 Oak Island Life Saving Station (BW0259) NRHP
 Fort Caswell Historic District (BW0230) NRHP
 Bald Head Island Lighthouse (BW0001) NRHP
 Southport Historic District (BW0008) NRHP
 Kate/formerly Carolina (CFR82/31BW848) DOE
 CSS North Carolina (CFR52) DOE
 Fort Johnston (BW0004) NRHP
 Price Creek Beacon (BW0573) SL
 The Rocks (BW0248) SL
 CSS Raleigh (NEI3/31BW814) NRHP
 Battery Buchanan/Parcel 2 Ft. Fisher (NH1473) NHL
 Fort Fisher/Parcel I (NH0562) NHL
 Sunny Point Military Ocean Terminal Sites
 Brunswick Town/Fort Anderson (BW0002) NRHP
 Orton Plantation (BW0005) NRHP
 Orton Planation Boundary Increase (BW07170) NRHP
 Dark Branch Community Historic District (BW1097) SL
 Lilliput Plantation Site (BW0241/cemetery site 31BW550)
 Kendal Plantation Site (BW0240/31BW788 +10 sites)
 Allen Graves Site (BW0285/31BW584) SL
 Clarendon Plantation/Devereux H. Lippitt House (BW0227) SL
 USS North Carolina (NH0004) NHL/NR
 Wilmington Historic District (NH0003) NR

Owner

Town of Oak Island
 Gary A. Studer
 Baptist State Convention of Nc
 Old Baldy Foundation
 City of Southport
 State of North Carolina
 US Navy
 City of Southport
 Archer Daniels Midland Company
 US Army Corps of Engineers
 US Navy
 State of North Carolina
 State of North Carolina
 Dept. of the Army
 State of North Carolina
 Orton Plantation Holdings, LLC
 Orton Plantation Holdings, LLC
 Professor Charles Chavis
 Lilliput Interests LLC
 Orton Plantation Holdings, LLC
 Lilliput Interests LLC
 Ms. Rachel Pace
 State of North Carolina
 Wilmington HPC

Wilmington Federal Building & Courthouse (NH0002)
 Gullah Geechee Corridor
 Cape Fear Lock and Dam #1 (BL0235) DOE
 Cape Fear Lock and Dam #2 (BL0260) DOE

General Services Admin.
 Dr. Dionne Hoskins-Brown
 US Army Corps of Engineers
 US Army Corps of Engineers

We would also note that throughout the PA the term "Consulting Parties" appears to include the signatories to the PA. For clarification, we would recommend that the phrase "Signatories and Consulting Parties" be used as there is a difference between the two that needs to be maintained throughout the PA.

Timeframes and Review Procedures:

As noted above, Signatories need to be included in this process and in all the following stipulations in which the term Consulting Parties is used to ensure that all parties to the PA have the information needed to comment as required.

Treatment of Historic Properties/ Identification and Evaluation:

Given that some of the properties that may be eligible for the NRHP are structures/district rather than archaeological sites, the *State Historic Preservation Office's Historic Structure Survey Report Standards* need to be included as well as the Office of State Archeology's report standards.

The remainder of the PA appears to be standard stipulations. However, we reserve the right to offer additional or more specific comments as we consult in the development of a final PA for the undertaking.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or environmental.review@dncr.nc.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



for Ramona Bartos, Deputy
 State Historic Preservation Officer

cc:	Dr. Darin Waters, SHPO	darin.waters@dncr.nc.gov
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