



## 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](mailto: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](mailto:environmental.review@dncr.nc.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

*Renee Gledhill-Earley*

for Ramona Bartos, Deputy  
 State Historic Preservation Officer

cc: Dr. Darin Waters, SHPO  
 Bryan Hemphill, Ft. Caswell  
 Penny Tysigner, HP Planner  
 Chris Webb, Bald Head Island  
 Adrienne M. Rogers, MOTSU  
 Jim Steele, Fort Fisher SHS  
 Jim McKee, Brunswick Town SHS  
 Dillon Epp, Orton Plantation  
 Ann Colley, Orton Plantation  
 Dr. Charles Chavis, Dark Branch  
 Rachel Pace, Clarendon Plantation  
 Dr. Jay Martin, USS North Carolina

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