



## **NORTH CAROLINA WILDLIFE FEDERATION**

*Affiliated with the National Wildlife Federation*

Regional Office  
2155 McClintock Road  
Charlotte, NC 28205  
704-332-5696

Mr. Henry Wicker  
U.S. Army Corp of Engineers  
Wilmington Regulatory Field Office  
P.O. Box 1890  
Wilmington, NC 28402

Subject: Action ID # SAW-2007-00073, Carolina Cement Company (Titan America), New Hanover County, North Carolina

Dear Mr. Wicker,

Please accept these comments by the North Carolina Wildlife Federation in response to Corps Action ID # SAW-2007-00073. The North Carolina Wildlife Federation is a non-profit organization representing tens of thousands of supporters and affiliate and chapter constituents in the conservation and protection of wildlife and its habitat in North Carolina.

Based on the information provided by your public notice on June 5, 2008, the Federation has many concerns about the proposed Carolina Cement Company's proposal to construct a cement manufacturing facility and quarry adjacent to the Northeast Cape Fear River and near Castle Hayne in New Hanover County, North Carolina.

Cement plants are among the worst industrial polluters, emitting large amounts of pollutants from the burning of coal for fuel and the pulverizing of limestone. The North Carolina Wildlife Action Plan identifies the Northeast Cape Fear River as a priority area for habitat protection. Priority areas have high species diversity, rare species and endemic species.

The Federation is concerned about impacting forested floodplains that are important to many birds as breeding, wintering, and migrating stop-over habitat. These wetlands provide food and cover for wildlife throughout the year. Seasonal flooding of these areas produces shallow, warm water areas where many fish species spawn and feed.

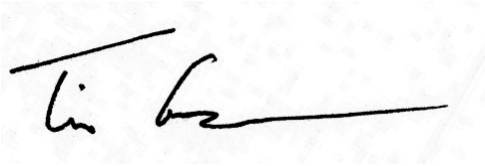
The Cape Fear River estuary has high fish species diversity, with 250 species documented. An ecosystem with so many distinct ecological features merits the highest level of conservation measures to protect the habitat for high priority species such as the Atlantic sturgeon, striped bass, American eel, and American shad and many others.

The elimination of approximately 500 acres of the uniquely positioned tidal freshwater wetlands along the Northeast Cape Fear River would remove important habitat for birds that migrate over many states and fish that also occur along the coast of several states.

The Federation believes the forested wetlands that would be impacted over the course of plant operation at the Castle Hayne site may represent an aquatic resource of national importance and we request that the planning process develop alternatives with less environmental impact.

The Federation suggests that site selection for this project compare the protected and high priority species that occur at the Castle Hayne alternative site with other suitable sites.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Gestwicki", written over a light blue grid background.

Tim Gestwicki  
Executive Director