



Cape Fear Audubon Society ≈ P.O. Box 414, Wilmington, N.C. 28402 ≈ [www.capefearaudubon.org](http://www.capefearaudubon.org)

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

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

Dear Mr. Wicker:

The Board and members of the Cape Fear Audubon Society wish to express our concerns with the proposed site of Titan America's manufacturing facility and quarry in Castle Hayne. As a local chapter of the National Audubon Society, we are especially concerned with the possible effects of the facility and mine on wetlands habitat important for migratory birds and on water quality in the Cape Fear River and its estuaries.

The proposed mine is located in a large, forested wetlands tract, a type of habitat being rapidly lost in Southeastern North Carolina and of great importance to the survival of many declining species, including the Red-headed Woodpecker, Prothonotary Warbler, Rusty Blackbird and Swainson's Warbler. This habitat is likewise important for migratory birds, which are also in decline due to habitat loss, climate change, increased predation, and human disturbance. The U.S. Fish and Wildlife Service considers the habitat on this site "a very valuable resource that may be irreplaceable within the landscape of Southeastern North Carolina".

We are further concerned that the proposed site would destroy large amounts of habitat along the Northeast Cape Fear River, which has been identified by the North Carolina Wildlife Action Plan as a priority area due to high species diversity. Within a 25-mile radius of the proposed facility and mine, significant acreage has been purchased with \$111,382,726 of state, federal and private funds to preserve habitat and restore water quality. We are concerned that this investment of taxpayers' funds in these lands will be jeopardized by the long-term effects of this plant on the area's air and water quality. Such deleterious effects are well-documented for cement plants.

We are also concerned about the accumulation of heavy metals, especially mercury and lead, in the sediments and in the plants and animals (including people) of the Cape Fear region. Southeastern North Carolina is already a hotspot for mercury pollution, partly due to the earlier presence of a much smaller cement plant in Castle Hayne. Mercury is most toxic in the presence of water and has already accumulated in fish in our waters, requiring fish consumption advisories. The National Audubon Society has designated 11 areas in our region as Important Bird Areas, including habitat crucial for the nesting of such fish-eating birds as Common Terns, Least Terns, Black Skimmers and Brown Pelicans. These Important Bird Areas are already facing significant pressure due to rising sea

Steve Boekell, Sally Buchanan (Treasurer), Andy Fairbanks (Vice President), Mark Jones, Nikki Mitchell, Jim Nesbit, Cary Paynter (Secretary), Jamie Rotenberg, Stacy Smaltz, D.D.S., Juanita Roushdy (President), Andy Wood

levels, strong storms, increased predation, coastal development and increased human use of beaches. We believe that the addition of significant amounts of toxic mercury to our waterways may pose an additional threat to these birds as these toxins accumulate in the higher levels of the food chain.

For these reasons, we ask that the Castle Hayne site be eliminated as a potential site for Titan America's cement plant and mine.

Sincerely,

Juanita Roushdy  
President  
Cape Fear Audubon Society

cc:

Governor Beverly Purdue

Mr. Dee Freeman  
Secretary  
N.C. DENR

Mr. Keith Overcash  
Director  
Division of Air Quality, NC DENR

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