

Dear Ms. Roth,

I am writing to express my strong support for including all of the western bank parcels into the Conservation place type as part of the amendments to New Hanover County's 2016 Comprehensive Plan, rather than creating a Downtown Riverfront place type.

I stand with Alliance for Cape Fear Trees, Bellamy Mansion Museum, Cape Fear Audubon, Cape Fear River Watch, Cape Fear Sierra Club, Historic Wilmington Foundation, League of Women Voters of the Lower Cape Fear, NC Coastal Federation, NC Gullah Geechee Greenway Blueway Heritage Trail, and NC NAACP, as we believe the Conservation place type is the most appropriate and beneficial approach for this area, informing future rezoning decisions.

New Hanover County (NHC) is poised at a critical crossroad. Will we wade into the expanding flood waters of the Cape Fear River's west bank? Or will we choose a way forward that embraces long-term resilience and sustainability?

**Our collective reasoning is rooted in several key points:**

**1. Flooding & Public Safety:**

The western bank parcels are part of a dynamic compound floodplain, subject to high tides, river flooding, storm surge, excessive rainfall, and sea level rise. With these factors at play, NHC's lowland areas are flooding more frequently and to a greater extent every year. Development in these areas poses a significant risk to public safety, accessibility, infrastructure, and stormwater management. The persistent flooding in the western bank areas not only endangers infrastructure but also significantly impacts insurance costs.

The Flood Risk Information System (FRIS) maps show that all of the western bank is in flood areas. Three of the County's most frequently flooded roadways are found on the West Bank: Battleship Road NE and USS North Carolina Road on Eagles Island, as well as Point Harbor Road on Point Peter. The frequency of these floods is increasing from compound flood events, particularly high-tide flooding. It is significant to note that, by the time these roadways flood, much of the land surface on the West Bank has already been inundated.

**2. Statutory Requirement to Acknowledge UDO 9 (Flood Damage Prevention):**

According to New Hanover County's Unified Development Ordinance (UDO), which mandates the prevention of flood damage, we should not be risking development in these hazardous, floodplain areas. Given the frequent and severe flooding in the proposed development areas, it is imperative that we prioritize flood damage prevention to ensure public safety and infrastructure integrity.

**3. Tax Increases:**

Development in flood-prone areas can lead to significant tax increases for county residents due to the higher costs associated with flood damage repairs and infrastructure maintenance. By adopting the Conservation place type, we can mitigate these financial burdens on our community.

**4. Historic Resources:**

Development in these areas threatens the integrity of numerous historic and cultural assets. Tall

structures, increased flooding, and the installation of utilities could damage or impede access to sites such as:

- **Gullah Geechee Cultural Heritage Corridor:** This corridor includes vital remnants of rice canals and other aspects of rice production that are crucial to preserving the heritage of the Gullah Geechee people.
- **USS *North Carolina* Battleship Memorial:** As both a historic structure and a memorial to the 11,000 North Carolinians who made the ultimate sacrifice defending freedom in WWII, it is essential to protect the viewshed and access to this site.
- **Archaeological Assets:** The area contains submerged historic resources, including vessels, docks, shipyards, and naval store production sites.

### **5. Economic Impact of Heritage Tourism & Ecotourism:**

Conserving the natural and historical landscape of the western bank parcels will enhance heritage and ecotourism opportunities. Both forms of tourism boost the local economy while ensuring that our natural and cultural resources are protected for future generations. Notably, the USS *North Carolina* Battleship Memorial, a key historical attraction, is the #1 most popular site in Wilmington and 6th in the state, according to TripAdvisor.

Preserving this area's unique ecosystem promotes educational and recreational activities, drawing visitors interested in the natural beauty and ecological significance of the region. The proposed Eagles Island Nature Park aligns with the Conservation scenario, driving tourism and public engagement.

### **6. Environmental Conservation and Protection:**

The western bank parcels are home to diverse ecosystems, including freshwater marshes and primary nursery grounds for finfish and shellfish. These areas support high biodiversity and contain several endangered, threatened, and state-rare species. The Conservation development scenario would protect these critical habitats from the detrimental effects of urban development, such as pollution, habitat fragmentation, and increased flooding. By maintaining these natural areas, we ensure the sustainability of our local environment and its ability to provide essential ecological services.

While we understand there may be interest in limited development near the northern Point Peter parcel, it is crucial to emphasize that this should not detract from the overarching need for conservation throughout the western bank area.

In conclusion, adopting the Conservation place type is not only a statutory obligation but also a necessary step to protect our community's cultural, historical, and environmental resources. We urge NHC officials to prioritize long-term resilience and sustainability by endorsing this approach and reconsidering the Downtown Riverfront place type.

Thank you for your consideration.

Sincerely,