

***James D. Fraser***

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Norfolk District, Corps of Engineers  
(ATTN: CENAO-WR-R, George Janek)  
803 Front Street  
Norfolk, Virginia 23510-1011

Date February 16, 2020

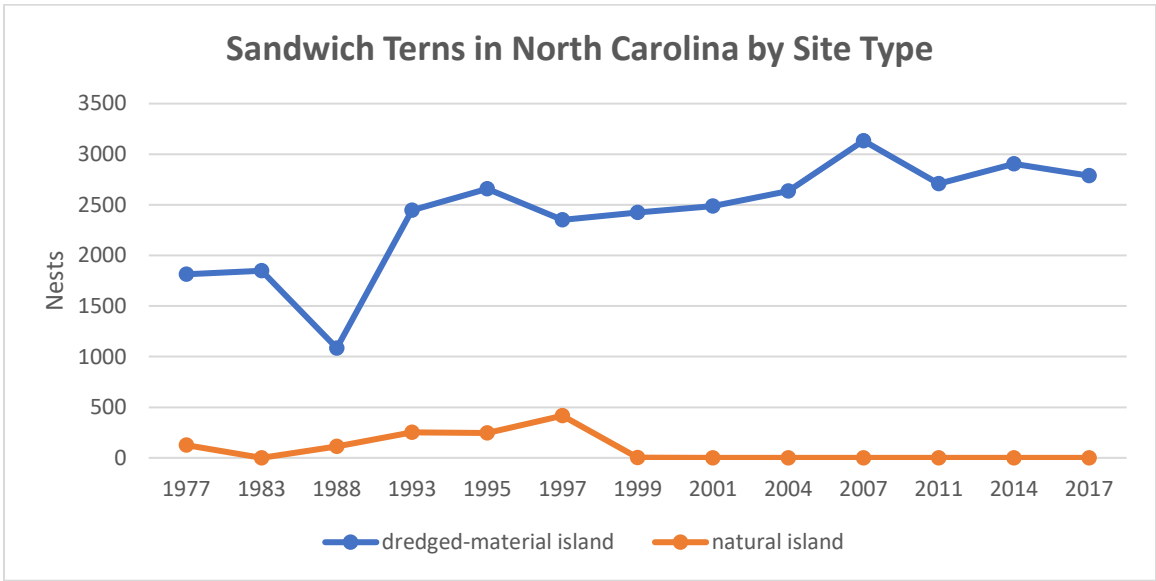
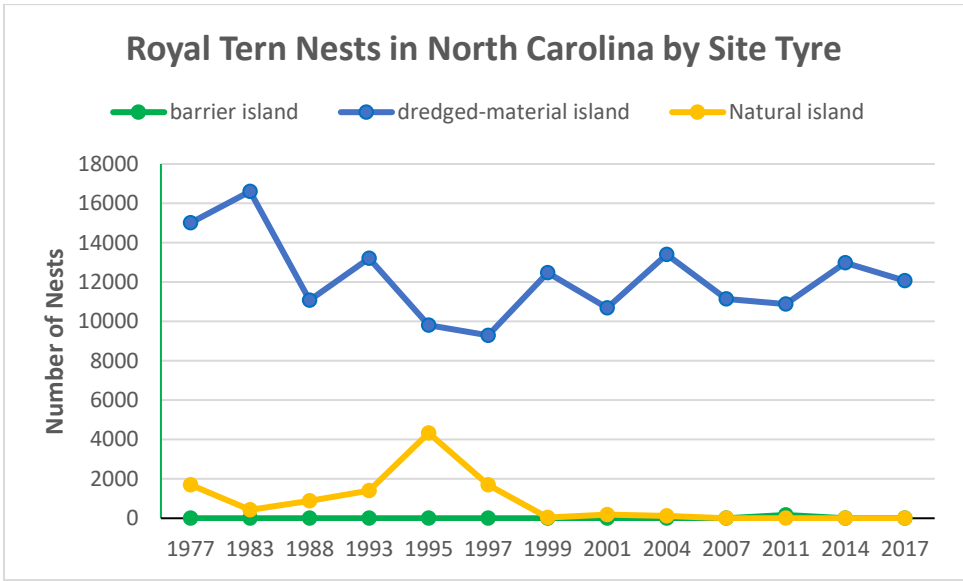
Dear Mr. Janek,

I am writing to add to my previous comments on the permits requested by the Hampton Roads Connector Partners for expansion of the Hampton Roads Bridge Tunnel (HRBT, CENAO-WR-NAO-1994-1166).

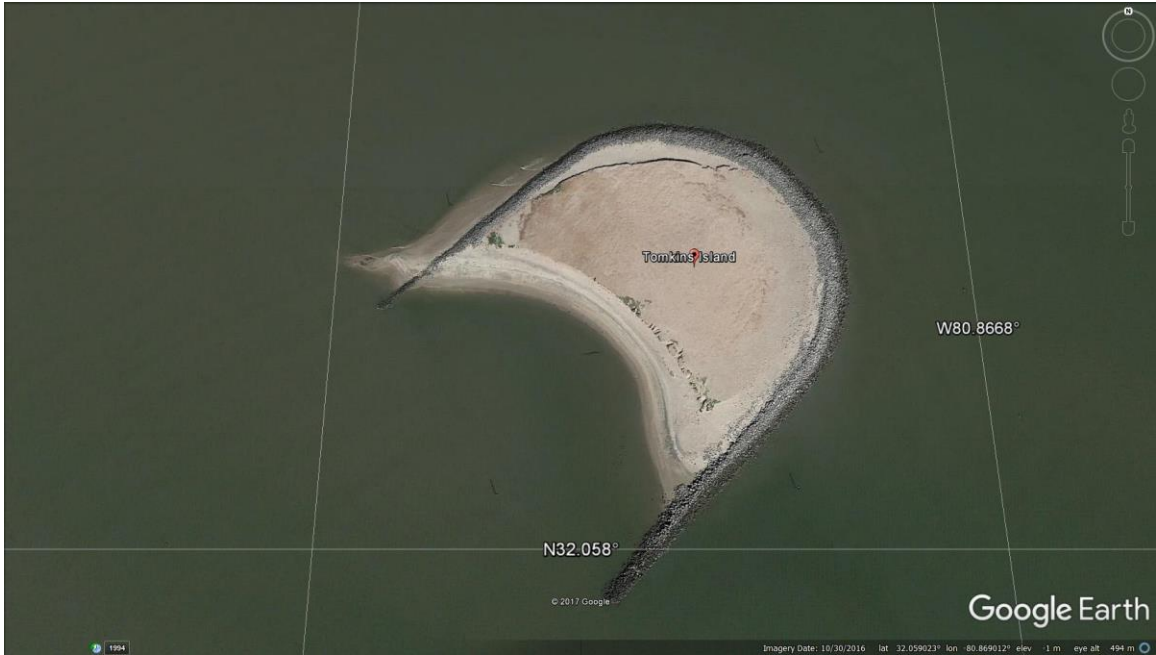
Specifically, I wanted to share some information I recently discovered about seabird nesting in North Carolina and share an image of a Corps-built seabird Island in South Carolina.

The key piece of information is that a substantial number of seabirds in North Carolina nest on dredged material islands.

Interestingly all 12065 Royal tern nests found in North Carolina and all 2788 Sandwich tern nests found in North Carolina in 2017, were on dredged material islands. Forty one percent of laughing gulls found in North Carolina in 2017 were on dredged material islands. Data from the North Carolina Natural Resources Commission. Please see the following images.



Here is an image of Tomkins Island in South Carolina built by the Savannah District of the Corps of Engineers, specifically for seabirds, to mitigate losses from dredging Savannah Harbor. According to a blog by the South Carolina Department of Natural Resources, this little island has hosted more than 11,000 tern nests in a single year.



Given sea level rise and the loss of barrier island habitats, it appears that dredged material islands will be an important tool for seabird conservation in the future. I don't know why these habitats can be built in other states, yet it seems so hard in Virginia.

Thanks for your attention.

Sincerely,

*James D. Fraser*

James D. Fraser, Ph.D.  
Conservation ecologist