September 23, 2025

COL Brad Morgan

District Engineer

USACE Wilmington District

69 Darlington Ave

Wilmington, NC  28403

Subject:  Comments regarding the Draft Wilmington Harbor 403 Letter Report & Draft Environmental Impact Statement (EIS) – Secondary, and Cumulative Effects to be added to the “With Project” Purpose

Dear COL Bennett

NEPA has a broad definition of secondary and cumulative effects that relate directly to the purpose and need of this proposed project. Secondary effects refer to those that occur later in time or farther away but are still easily predictable due to a single action. These effects can have a wide range of consequences, such as changes in land use, water quality, economic stability, and population density. Cumulative effects, on the other hand, are the result of incremental consequences of an action, combined with other past and foreseeable future actions. They are less defined than secondary impacts and can be challenging to detect. However, over time, they can accumulate and eventually lead to a measurable economic or environmental change.

The EIS identifies three distinct modes of Port transportation that the deepening of the Cape Fear River will impact.

1.       Larger, deeper-draft containerships.

2.       Increased number of “heavy duty” trucks to service the future increased volume of freight carried to the Port by the larger containerships, and,

3.       Longer freight trains will be required to transport goods and commodities out of the Port.

While the EIS focuses much of the report on the economic values and technical considerations necessary for the Port to accept larger containerships under the “with project” conditions, it spends little time analyzing the economic and environmental secondary effects of increased heavy trucks and longer trains in and around the Wilmington Metro area.

Heavily laden Port trucks have and will continue to cause significantly more wear and tear on our local roads and bridges due to their weight and wheel loading impacts. This leads to higher maintenance costs for local, state, and federal governments. As the number of Port trucks increases, they will definitely contribute to more traffic congestion, resulting in longer commutes, lost productivity, and higher operating costs for all road users. Another overlooked secondary effect is the environmental impact of increased emissions from Port trucks, which can lead to public health issues and higher healthcare costs for our local citizens. Additionally, the economic burden of government subsidies for road use by Port trucks means taxpayers, not the Port of Wilmington, cover the costs of infrastructure damage and externalities. This includes the expense to the public for future replacement of the Cape Fear Memorial Bridge, which is the main route for inbound and outbound Port truck traffic and the leading cause of its structural deterioration.

The current projected cost to replace the Cape Fear Memorial Bridge is approximately $1.1 billion.

Since an increase in heavy truck traffic is a secondary impact of the “with project” condition, all related economic and environmental costs related to this should be included as an essential part of the EIS’s economic and environmental assessment, as required by NEPA.

Another secondary impact not included in the economic or environmental impact assessment of the EIS is the effect of longer freight-laden trains with increased inbound and outbound frequency. There are many references in the EIS to the Port’s rail operations. One citation states, “The rail route is through the City of Wilmington and crosses many of the city’s major roads.” More than two dozen crossings within the city are at-grade, many of which are critical routes for ambulances and other emergency vehicles. One estimate of the length of these future trains is nearly 2 miles, which would wind through the City of Wilmington.

Working to address this challenge, the City of Wilmington has been actively engaged in a rail realignment project that would create a bypass railroad route between the Davis Yard in Navassa and the Port of Wilmington. The proposed route would enable the relocation of freight traffic by rail from the urban core of the city, benefiting public safety, regional transportation mobility, and the overall efficiency of local rail operations.

The estimated cost of the Wilmington Rail Realignment project has ranged from $670 million to over $1 billion, and it also faces significant environmental challenges.

The Wilmington Rail Realignment project is vital for the future operations of the Port as well as the safety and well-being of our residents. Since this issue is a secondary impact of the “with project” condition, all economic and environmental costs related to this should be included as an essential part of the EIS’s economic and environmental assessment, as required by NEPA.

Thank you for allowing me the opportunity to comment on this crucial endeavor. Thank you.

Essayons,

//signed//

Brayton Willis

USACE Senior Project Manager, Retired

P.O. Box 2135

Leland, NC  28451