September 25, 2025

COL Brad Morgan

District Engineer

USACE Wilmington District

69 Darlington Ave

Wilmington, NC  28403

Subject: Comments on Draft Wilmington Harbor 403 Letter Report & Draft EIS – Two Additional Alternatives to meet NEPA requirements.

Dear COL Morgan

NEPA requires the Corps to thoroughly review the Port of Wilmington's Section 203 report and consider all alternatives that meet the project's primary goals. The USACE should consider every reasonable option in the area to identify the most practical solution with the least environmental impact.

However, the Port of Wilmington’s Section 203 Report only looks at a 28-mile section of the Cape Fear River. It leaves out two reasonable alternatives that could also meet the project’s goals and environmental needs.

1. Relocation of the Port to its 600-acre site about 26 miles further downstream near the city of Southport, close to Sunny Point Military Ocean Terminal, and,
2. Moving all of the Port of Wilmington’s operations, infrastructure, and its 200+ employees to the Port of Morehead City, approximately 90 miles to the north.

In 2006, the Port of Wilmington requested that the USACE Wilmington District explore relocating to a 600-acre site 26 miles south in Brunswick County, near the Sunny Point Military Ocean Terminal. ("Military Ocean Terminal at Sunny Point", 2006) The Port’s Section 203 Report mentions*an initial study on the viability of this location close to the federal navigation channel and the ocean.*

That reconnaissance-level study evaluated federal interest but found no significant cost savings for channel improvements. The report estimated that relocation to Southport would cost $2.5 billion in 2008 and would have a greater environmental impact due to the dredging involved.

Moving forward, the Port’s Section 203 Report focuses on deepening the river and does not fully consider the option of moving the Port of Wilmington 26 miles downstream. Comparing the options reveals that relocating to Southport warrants a closer examination due to its practical benefits and potential impacts. Over the long term, relocating the port could result in cost savings. When you add up 30 years of dredging, maintenance, and risk management costs, relocating to Southport could be a more affordable choice than deepening the river. Moving the port to Southport could:

1. Eliminate further deepening of the Cape Fear River for the 26-mile reach to Wilmington.
2. Cutting back on future dredging would give the river and its freshwater ecosystems a chance to recover naturally. This would benefit the Lower Cape Fear River watershed/ecosystems, which have faced numerous environmental problems due to past dredging. Pointing out this benefit demonstrates how the project can support both the community and the environment.
3. Minimize the upstream effects of storm surges and compound flooding.
4. Potentially use the Sunny Point rail system, avoiding the cost of the Wilmington Rail Realignment project and new bridges through Eagles Island’s historic and sensitive floodplain and wetlands.
5. Combine the Sunny Point and Port of Wilmington dredging projects into a single multi-use federal effort.
6. Minimize ship travel and exposure time on the river.
7. Increase port traffic loading and unloading turnaround times.
8. Lower cargo ship fuel expenses, air pollution effects, and carbon footprint.
9. Relocating the port could help mitigate significant risks and problems associated with large cargo ships in the Cape Fear River. Accidents involving these larger ships can be significantly worse than those involving smaller ones. For example, the Ever Given blocked the Suez Canal in 2021, causing significant supply chain disruptions. ("Suez Canal blockage is delaying an estimated $400 million an hour in goods", 2021) Due to recent accidents like this, the NEPA risk analysis should assess the likelihood of a similar incident occurring in the Cape Fear River.
10. Brunswick County land could help grow port operations. If Wilmington’s current port site is repurposed, it could bring new jobs and housing. Transforming the area into a mixed-use development could result in the addition of many new homes and create jobs in construction, retail, and other sectors, thereby supporting the local economy. The city could also see more tax revenue to support public services and infrastructure. Presenting this as a win-win could help local leaders view relocation as an opportunity for community renewal.

Another feasible alternative—relocating the Port of Wilmington’s operations to Morehead City, 90 miles to the north—has not been analyzed, despite its potential to achieve the project’s basic purposes fully. This site offers sufficient land, access to highways and rail, and proximity to the ocean, making it a practical and strategic option.

Given these challenges and the billions of dollars projected to be expended on supporting the Port's future operations, the USACE needs to evaluate and prioritize reasonable alternatives that will help the Port achieve its vision for growth and ensure the region’s long-term environmental and infrastructure stability.

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

Essayons,

//signed//

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