

November 1, 2025

COL Brad Morgan  
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Subject: Secondary and/or direct impacts of the proposed Wilmington Rail Relocation Project ignored in the Draft EIS (DEIS) and the Port's Section 203 Report, which violates the requirements outlined in the National Environmental Policy Act (NEPA).

Dear COL Morgan

**QUESTION: Why would the USACE DEIS and the Port's Section 203 completely ignore NEPA requirements for direct and/or secondary effects related to the proposed Wilmington Rail Relocation Project, directly linked to the proposed deepening of the Cape Fear River, in violation of that Act?**

Referencing the "Wilmington Rail Realignment DRAFT, Purpose and Need Report, Prepared For: Federal Railroad Administration and the City of Wilmington," pages 10, 12, and 13 serve as explicit references highlighting the need to spend over \$1 billion to relocate this rail line for the future Port expansion, establishing that this effort is either a direct or secondary effect.

***"Wilmington Urban Area Metropolitan Planning Organization Long-Range Transportation Plans The Cape Fear Moving Forward 2045 Metropolitan Transportation Plan (City of Wilmington 2020), was adopted in November 2020. A key focus of the 2045 plan is improving freight movement within the region by promoting intermodal connections for ports, rail, and highway to improve supply chain reliability. This includes improvements to the US 74 highway corridor and the CSXT rail line connecting the Port of Wilmington to Charlotte, as well as restoration of the rail line between Castle Hayne and Wallace to provide rail access to Raleigh and the Northeast. The plan notes the Wilmington Rail Realignment as an important connection within the region's transportation network and includes a number of roadway and rail projects to improve freight movement in the region. Truck/roadway projects include several projects along Shipyard Boulevard, the primary access to the Port, as well as roadway widenings and intersection improvements on truck routes to the Port. Rail projects include safety improvements at several at-grade crossings of the CSXT Beltline. Other projects listed in the Roadway element of the plan are also targeted at reducing/maintaining the rate of mean travel time for people and freight, reducing vehicle miles travelled (VMT), maximizing throughput for each lane, reducing peak hour delay, and addressing future growth in employment, population, and freight/industry.***

***Cape Fear Memorial Bridge Feasibility Study (NCDOT SPOT ID H185357)***

*NCDOT Feasibility Studies Unit completed an express design and environmental screening for replacing the Cape Fear Memorial Bridge, which carries US 17/US 76/US 421 over the Cape Fear River between New Hanover and Brunswick Counties north of Wilmington. The existing bridge is a 4-lane steel center-span vertical lift bridge. The feasibility study proposed expanding to a 6-lane median divided facility with one alternative (Alternative 4) incorporating a new railroad crossing." [1]*

This draft report further states on pages 12 and 13:

*"The Project will address three main needs including the need for enhanced efficiency of freight movement, improved safety, and improved regional mobility and reliability. The challenges the City of Wilmington faces with rapid population growth and increasing traffic congestion combined with increases in freight movement through the Port of Wilmington are straining the existing transportation network. Of*

concern are the numerous at-grade crossings through the city that pose a risk to public safety, increased traffic delays and travel times, and increased auto emissions due to longer idling. To access the Port of Wilmington, freight trains must currently travel over 10 miles through Wilmington, crossing 32 at-grade crossings (30 public crossings and 2 private crossings) within the Project Study Area. The at-grade crossings frequently cause traffic delays, present a safety risk and reduce the quality of life for the 50,000 residents in the study area. Due to increasing volumes at the Port and sustained population growth, compounded impacts are expected to worsen in the coming years.

Under future conditions, the project assumes the local transportation system would evolve as currently planned without implementation of the Project. With the exception of routine maintenance and fiscally constrained programmed projects, such as the Wilmington Beltline Improvements Project (P-5740), no change would take place along the existing corridor within the Project Study Area.

#### **1.5.1 Efficient Freight Movement**

Brunswick and New Hanover Counties have experienced robust population increases in recent years, affecting the fluidity of the local transportation network. Added delays at rail crossings due to slow moving or stopped trains affects the local operations of the freight and vehicular network within the Project Study Area.” [1]

A direct quote from the Wilmington Realignment Project update, July 2019 PowerPoint:

- 8 round-trip, longer trains through the city, 16 passes a week by 2025.
- 6 round-trip, longer trains through the city, 12 passes a day to reach capacity, eventually expected increase of truck traffic and congestion, especially once Port traffic reaches the maximum of 6 trains
- Minimum 20–30 minute delays at street crossings, >4 hours wait in 24 hours.
- Combined congestion reaches gridlock and blocks emergency services over large areas of the city.
- Lost opportunity for both Port growth and regional business and trade growth

The Port of Wilmington plans to expand cargo transportation by using longer trains to handle freight more efficiently in the future, as already noted by USACE and the Port of Wilmington in their documentation. In that case, NEPA clearly requires the USACE to evaluate the environmental impacts of all such methods and the costs related to the rail realignment, considering potential effects on natural, human, and economic resources.

Without question, the Port’s proposed dredging project footprint has been artificially limited, either intentionally or unintentionally, to exclude the complete impact cycle of the Port of Wilmington’s effects on the rail system and other critical infrastructure, such as roads and bridges.

I appreciate the opportunity to comment on this important endeavor.

Thank you.

//SIGNED//

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[1] <https://mail.google.com/mail/u/0/?#inbox?projector=1>