



North Carolina Department of Environment and Natural Resources
Division of Coastal Management

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Director

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Secretary

October 30, 2009

Frank Yelverton
Wilmington District Office
US Army Corps of Engineers
69 Darlington Avenue
Wilmington, NC 28403-1343

SUBJECT: Reconnaissance Study for the Proposed North Carolina International Terminal, Southport, Brunswick County, North Carolina (DCM#20090153)

Dear Mr. Yelverton:

The NC Division of Coastal Management (DCM) received a request for comments from the US Army Corps of Engineers (Corps). According to the review request, the Corps of Engineers will be evaluating whether there is a Federal interest in participating in a cost shared Feasibility Phase Study with a non-Federal sponsor to modify the existing Wilmington Harbor project, known as the North Carolina International Terminal. The facility contemplated under the revised Wilmington Harbor project would be located on a North Carolina State Ports Authority-Owned 600-acre site south of Progress Energy's Brunswick Nuclear Plant. Below are DCM's comments. The comments below (in some instances) will apparently go beyond the immediate issue of whether a Federal interest exists or not; but could have an indirect influence on determining whether a Federal interest exists.

- There is an existing port at Wilmington. The implied question when evaluating the establishment of a new facility is the issue of whether the existing facility would be able to accommodate future maritime traffic. This would also include an analysis of whether the existing port could be upgraded to incorporate future maritime traffic and the costs associated with modifying (if necessary) the existing navigation channels.
- There are a variety of facilities that any proposed terminal will need to be integrated with through rail and road connections. Nearby facilities would include Wilmington International Airport (ILM), Military Ocean Terminal at Sunny Point (MOTSU), and Camp Lejeune. In terms of the "*bigger picture*" the proposed facility must be integrated with existing rail, road, and air transportation networks to enable the movement of goods throughout the United States.
- Evaluating the construction of the proposed facility must also include indirect effects resulting from the establishment of the new facility. First, a new facility will result in the transfer of some existing businesses from the current facility to the new facility. Second, the establishment of a new facility will create demands for the utilization of land outside of the facility itself. For example,

there may proposals for housing subdivisions, the creation of business parks, and the establishment of shopping malls.

- The establishment of the proposed facility will have environmental effects that should be investigated. The analysis of environmental effects should evaluate how the adverse effects and be minimized and in the case of unavoidable effects, how they will be mitigated.

Thank you for your consideration of the North Carolina Coastal Management Program.

Sincerely,



Stephen Rynas, AICP
Federal Consistency Coordinator

Cc: Doug Huggett, Division of Coastal Management
Steve Everhart, Division of Coastal Management