

DATE: November 19, 2009  
TO: USACE, Wilmington District  
ATTN: NCIT Project Team  
69 Darlington Avenue  
Wilmington, NC 28403

FROM: Wendie A Schneider, on behalf of Coastal Water Watch and Partners for Peace  
SUBJECT: North Carolina International Terminal (NCIT)

As a member of Coastal Water Watch and Partners for Peace, I was tasked by these groups to respond to the Wilmington District, US Army Corps of Engineers regarding the reconnaissance study on the proposed NCIT at Southport. Both groups are opposed to the port for reasons discussed in this paper.

Brunswick County residents have a long history of a rural and simplistic lifestyle. From the first settlements in the 1660s to the present, people stay because there are neither large cities nor industries. Instead, there are quiet little towns, productive farms and pine forests; an abundance of wildlife; plus streams, rivers, and the ocean—rich in natural resources. Tourism activities and vacation homes for city dwellers abound. Commercial fishing is a mainstay. Vacationers come here to enjoy the slow pace, clean beaches, winding country roads, and recreational sports like kayaking the rivers; beachcombing, boating & fishing in the ocean; hiking & biking along country roads and through the pine forests. Everyone here seeks escape from cities' pollution and congestion. Brunswick County provides this escape in three pleasant seasons each year. Even winter has its attractions with warm spells and sunny days. ***The true value of this county to the state is not in a mega-port; it is in the natural beauty of the ecology. Brunswick County's bio-diversity is unrivaled on the east coast except for Florida.***

The rationale to spend 2.5+ billion dollars to build this port is all about money—money in the form of jobs and state revenues. It is our contention that the revenues and jobs provided by the mega-port would be counteracted by lost revenue and lost local employment—especially in tourism and fishing. Numerous environmental impact studies have been conducted on areas surrounding major US ports. All reflect extreme harm done to the land, the water, and the health of the residents. Tourists wouldn't come and fishermen couldn't work in such areas. The only steady employment would be in the healthcare industry—treating conditions caused by polluted air and water.

Short-term jobs are not a reason to destroy an area. Jobs generated by the construction of the port (many temporary, varying length jobs), operation and maintenance of the port (50+ jobs) would not lead to a large number of sustainable incomes for local workers. Most of these temporary jobs would not go to out of work locals and, even if they did, the work would be temporary. Workers coming from other parts of NC or other states would require temporary housing. We do not have the inventory of empty homes, apartments, and condominiums to house the influx of workers and their families. We do not have the infrastructure of roads, schools, shopping, etc. required for so many more temporary people. If this housing (and associated infrastructure) is built, there would be construction jobs generated. The area would then be overbuilt to accommodate temporary workers. Once the port is constructed, these workers and their families would go back to their homes because there would be no other jobs to keep them here. The housing would sit unoccupied; the schools would lose students and the tax base that keeps them going; and businesses would lose customers. The economy of the county would nosedive. We need permanent, local, eco-friendly jobs and no other choice is acceptable.

Not only would the temporary jobs go away, there is a likelihood that currently employed locals would lose their jobs and/or would be paying more to live here due to threats posed by the new port:

Threat of groundwater loss or ***contamination/penetration of the Castle Hayne aquifer*** (43 feet below sea level), or its limestone confining unit, when dredging is done to 54.5 feet, is a huge risk. If fresh water is not available, no one can live here. It would take years to construct a desalinization plant to provide water once the aquifer is compromised.

Larger storm surge from southeast approaching hurricanes caused by tidal surge pose additional threats to the Brunswick Nuclear Plant and MOTSU, among the largest employers in the area. When plants are shut down for long periods, hourly employees suffer. Excessive hurricane damage would increase already high insurance rates and reduce value of homes in the area. Higher taxes to recover from hurricane damage would follow.

National security threat due to foreign vessels and cargo in close proximity to the largest munitions depot on the east coast and the nuclear reactor is unacceptable. ***Brunswick County is already high on the threat list*** because of the close proximity of the munitions and reactor. Add a mega-port to the mix and the threat increases exponentially.

Blasting kills marine life. Endangered species that reside here would be at risk, as well more common sea creatures. Because of the extensive scope of blasting and resulting seismic effects, ***there is risk to the containment vessel and equipment at the Brunswick Nuclear Plant***, the Archer-Daniels Midland citric acid plant, and the areas' historic lighthouses. Tourists would be elsewhere during any blasting periods, resulting in additional revenue loss. If there was a nuclear accident, we would all be evacuated or too sick to leave. Citric acid is an irritant; if it gets into eyes, it can cause blindness; if it is inhaled, it can cause lung disease or death.

Water pollution occurs from accidents due to increased chances of ship collision, fuel spills, or cargo loss when stacked-up vessels at sea wait for berthing space. Any such accident near the terminal site would require shutting down the reactors at the Brunswick Nuclear Plant. An oil spill would devastate area beaches and wetlands. Loss of hazardous cargo could necessitate closing fisheries. Any of these conditions gravely affect the area economy and current tourism and commercial fishing jobs.

Diesel engines at ports, which power ships, trucks, trains, and cargo-handling equipment, create vast amounts of air pollution. Ships would have a shorter distance to travel but trucks and trains would have a longer distance to reach major roads and rail lines going from Southport instead of Wilmington. There is a significant increase in cancer for people living around ports. Sick people can't work; health care and health insurance costs increase for those in high-risk areas.

Noise pollution generated by the port & ships could cause human and wildlife (marine & land) hearing impairment, hypertension, sleep deprivation, disorientation & reduced performance, behavior patterns including aggression. Crime rates are higher around ports and sick people can't work.

Light pollution (bright and flashing lights at night) at current ports bordering residential neighborhoods; disrupt human and animal biological rhythms causing stress. People who can't sleep can't work.

Community disruption and highway congestion caused by truck traffic throughout the county and rail traffic passing through the center of the City of Boiling Spring Lakes would cause widespread air pollution in residential areas. The county has minimal roads, none suitable for extensive truck traffic, which pass through small communities and school campuses. School buses and commuters going to jobs in Wilmington use these roads. They are also used for hurricane and nuclear emergency evacuation. Out of state truckers using these roads would affect locals' ability to get to their jobs, increase accident rates that would raise auto insurance rates, and be dangerous for schoolchildren waiting for buses along roadsides.

Dredged sediment, a continual requirement to keep the channel from filling up, is full of PCBs, mercury, pesticides and other toxic materials. Where would some of this material end up—on our beaches as "re-nourishment"?

Loss of aquatic habitat through destruction of extensive shallow-water marine habitat and shellfish beds where the new port & channel would be located would be permanent. This area is currently productive for the fishing industry as well as the birding, kayaking, boating, and sport fishing aspects of tourism. There would be permanent job losses here.

Upstream salt-water intrusion caused by tidal changes due to channel straightening would destroy habitat. Freshwater fish would leave or die and commercial fishermen would lose income. Boaters and recreational fishermen would go elsewhere.

Loss of beaches due to substantial erosion of beaches and sea turtle habitat on Bald Head Island has already occurred after the recent deepening project. Increase of depth and width of the channel would make the problem worse and include Oak Island, Holden Beach, Ocean Isle Beach, and Sunset Beach areas. These islands are sea turtle habitats and generate millions of dollars in tourism revenue, three-seasons a year. Tourists would go elsewhere if the beaches were soiled or eroded.

One hundred acres of the terminal site—now a salt marsh designated as estuarine wetlands by the North Carolina Department of Environment and Natural Resources —would be removed for berthing areas. Wetlands are irreplaceable. Salt marshes are popular tourism areas for kayaking and birding so that revenue would be permanently lost.

Ship strikes kill endangered species like sea turtles nesting on area beaches and North Atlantic Right Whales migrating past the Cape Fear. Loss of even one of these endangered species threatens their survival.

Undersea archeological sites would be obliterated in the currently undisturbed area to be dredged. (Indian artifacts dating back 6,000 years have been found above the waterline.) The known (and undiscovered) shipwrecks dating from colonial times attract divers, another tourism base, as well as marine archeologists and students from the area universities. More revenue lost.

Vessel traffic, consisting of the two existing busy ferries, recreational boaters using the river and Intracoastal Waterway, and commercial fishermen plus the proposed 1,200-foot long vessels accessing the port would have limited maneuver room in the confined waterway resulting in conflicts and increasing chances for accidents. Decreases in fishing time for commercial fishermen and

congested waterways that tourists want to avoid effects the area economy. These huge vessels are incompatible with tourism and commercial fishing.

Introduction of invasive species in released ballast; release of bilge water, sewage, or other wastewater; or accidental leaching into seawater would contaminate water and threaten our fishing industry. The poisonous lionfish has already invaded our waters and is harming local species. Hull antifouling agents contaminate water. Bacterial and viral contamination of the waters effect commercial fish and shellfish, deplete oxygen in water, and increase toxins in fish. Beaches would be unsafe for tourism; commercial fishermen would have fewer fish to catch and the fish caught would have increased health risks to those who eat them.

Stormwater runoff—the second largest source of water pollution in the US—from paved surfaces at the port, would pollute waters with contaminants and cause algae blooms which kill fish. Again, the tourism and fishing industries suffer loss of revenue.

Given the current state of the world economy and the decrease in exported goods/worldwide ship traffic, this proposed mega-port for the Southport area is a wasteful and poor idea. It is wasteful because it would threaten the entire environment of the county, the health of its communities, and waste billions of dollars that could be better spent on sustainable projects that would increase local employment without jeopardizing the environment. It is poor because the already functioning east coast mega-ports would fight for every shipping company's business and any projected revenue would be at risk through price wars. Charleston has already lost a major shipping line to Savannah because they wouldn't reduce prices. The cost benefit ratio couldn't be counted on in any scenario until the world economic crisis is over.

Although there would be many promises by the NC Port Authority to keep the port a "good neighbor", we know from studies on other ports, that this won't happen. According to a 2004 study conducted by the National Resources Defense Council *Harboring Pollution: The Dirty Truth About US Ports*

"Marine ports in the United States are major hubs of economic activity and major sources of pollution. Enormous ships with engines running on the dirtiest fuel available, thousands of diesel truck visits per day, mile-long trains with diesel locomotives hauling cargo, and other polluting equipment and activities at marine ports cause an array of environmental impacts that can seriously affect local communities and the environment. These impacts range from increased risk of illness, such as respiratory disease or cancer, to increases in regional smog, contamination of water, and the blight of local communities and public lands.

Marine ports are now among the most poorly regulated sources of pollution in the United States. The result is that most U.S. ports are heavy polluters, releasing largely unchecked quantities of health-endangering air and water pollution, causing noise and light pollution that disrupts nearby communities, and harming marine habitats."

In this study, the Port of Charleston received an overall "D" rating and the surrounding county is among the 30% dirtiest counties in the country. Charleston's air quality received an "F"; water quality received a "B" because shellfish harvesting has recently been resumed after years of closure; land use received a "C-" and community relations received an "F" (for failure to reduce noise). Charleston has had many spills and, although they respond quickly, the spills have seriously harmed habitat and wildlife. Charleston is "average" for mega-ports in the US.

Please do not continue this study. Look at the thoughtful suggestions garnered in the No Port Southport contest and put this land to better use.