



To protect and preserve the irreplaceable historic resources  
of Wilmington and the Lower Cape Fear Region

March 24, 2021

Mr. Aubrey Parsley  
Director of Rail Realignment  
305 Chestnut Street  
Wilmington, NC 28402

Dear Mr. Parsley,

Thank you for providing the Historic Wilmington Foundation (HWF) a copy of the Wilmington Rail Realignment Corridor Screening Report. We appreciate your attention to HWF's comments, concerns and requests regarding the Screening Report. The purpose of this correspondence is to enter HWF's Screening Report feedback into the public record. We ask that this correspondence please be provided to the Lead Federal Agency. First, however, I emphasize that HWF fully supports the city's rail realignment project so long as it is accomplished without undue adverse effects on historic resources. We believe a corridor can be chosen that avoids such damage and wish to work with the city as a consulting party to achieve this goal. HWF's preliminary concerns are as follows:

#### 1. Corridor C and New Hybrid Corridor D.

The 2017 Feasibility Study identified three feasible corridors: A, B, and C. Corridor C crosses the Cape Fear River furthest from, and is potentially least damaging to, Wilmington's National Register Historic District. However, the Screening Report concludes that Corridor C should be dropped from further consideration because it passes too close to the USS North Carolina Battleship and causes adverse auditory and visual effects on that National Historic Landmark. The report recommends that Corridors A and B move forward in the pre-NEPA process because they are further west of the Battleship. Yet, Corridors A and B appear to pass closer to the Wilmington National Register Historic District than Corridor C does to the Battleship. Corridors A and B will cause adverse visual, auditory and other effects to the Wilmington National Register Historic District and local Historic District-Residential, which have a dense concentration of historic, mostly residential, properties. HWF is concerned about all the historic resources in the Area of Potential Effects, including the Battleship and Historic District properties.

It is premature to drop Corridor C from consideration. Corridor C is feasible and meets the purpose and need of the project. HWF asks that it be included in the Alternative Analysis and NEPA Study phases. HWF also asks that a hybrid Corridor D, which would pass furthest from both the Battleship and the Historic District, be included in the Alternative Analysis and NEPA Study phases. Corridor D would follow the paths of Corridors A and/or B on the Brunswick County side of the River and would cross the river along Corridor C. Such a corridor is feasible and meets the purpose and needs of the project while affecting fewer historic resources.

#### 2. Southern River Crossing Further from the Historic District.

The Screening Report states that the City considered “conceptually” a Cape Fear River crossing 3,500 feet south of the Cape Fear Memorial Bridge, closer to the Port turning basin. The Report acknowledges that such a crossing would reduce potential impacts on the National Register Historic District. However, it rejects this crossing and does not include it for future analysis and study because of cost considerations. Again, it is premature to drop an otherwise feasible corridor. It is our understanding that cost considerations should not limit the scope of analysis and study at this stage. We ask that a corridor that crosses south of the Cape Fear Memorial Bridge, closer to the port turning basin, also be included in Alternative Analysis and NEPA Study phases.

### 3. Identification of Historic Resources within the Area of Potential Effects (APE).

HWF expects that historic resources within the Area of Potential Effects (APE) be listed individually during the Alternatives Analysis and NEPA Study phases, rather than listed collectively as a single historic resource under the National Register Historic District designation. For instance, Table 6 lists only twelve historic resources, which include five National Register historic districts and seven individual properties. Table 13, which compares various metrics taken into consideration in the Secondary Screening, indicates there are 0 to 4 “historic properties” and 0 to 1 “archeological resources” effected by the various options (no build, upgrade, and 3 corridors). Again, it appears Table 13 counts an entire historic district as a single historic resource.

HWF does not wish to imply that the authors of the report intentionally downplayed the number of historic resources within the APE. We understand that the Screening Report relied upon readably available GIS web services. However, the numbers as presented might mislead, and HWF expects that the Alternatives Analysis and NEPA Study phases list historic resources individually, including, but not limited to, contributing structures within National Register Historic Districts, properties listed on the National Register of Historic Places, eligible properties for the National Register of Historic Places, Local Landmarks, and National Historic Landmarks.

In addition, the National Historic Preservation Act requires that Wilmington and the Lead Federal Agency make a good faith effort to identify the historic resources within the APE. This includes properties listed on the National Register and eligible for listing. HWF asks that the APE please be surveyed to ensure that all such resources are identified.

### 4. Public Participation.

HWF appreciates the Public Input Plan prepared by AECOM. HWF understands that pandemic-related restrictions on mass gatherings make it difficult for the City of Wilmington to gather public input on the Rail Realignment project. We appreciated the Virtual Public Meeting platform used during the Project Initiation, Development of Purpose, and Need Statement milestone in late 2020. However, a virtual platform does not adequately replace the value of citizens hearing each other’s concerns in a public forum. Going forward, HWF respectfully asks that an in-person option for public input occur during the Identification of Alternative’s and Screening Criteria milestone, tentatively scheduled for June 2021.

Respectfully,



Travis John Gilbert, Executive Director

Cc: State Historic Preservation Office  
HWF Board of Trustees