

January 14, 2025

U.S. Army Corps of Engineers  
Regulatory Division Eastern Evaluation Branch  
Project Manager: Shelby Barrett  
Via email to: shelby.barrett@usace.army.mil  
Application #: MVN-2021-00270-ESG

The St. Bernard Parish Government submits this comment in response to the recent notice concerning Application #: MVN-2021-00270-ESG for an Ultra Large Container Vessel (ULCV) terminal to be constructed in Violet, Louisiana, the Louisiana International Terminal (LIT), by the Board of Commissioners of the Port of New Orleans (PONO). For the myriad reasons stated in this comment, St. Bernard Parish is opposed to the construction of the proposed ULCV terminal. The location of the proposed terminal is entirely inappropriate and will have significant adverse impacts on the Parish's residents, businesses, visitors, economy, infrastructure, natural resources, and environmental integrity. St. Bernard Parish is of the strong opinion that a full Environmental Impact Statement (EIS) must be created with public input. *See* 33 U.S.C. § 230.6(a).

This comment is divided into separate topics, but the topics may involve multiple aspects that USACE is required to consider in its NEPA analysis. The titles should not be taken as limiting the scope of what follows each, and the comment should be considered as an integrated whole.

## **Introduction and Context**

St. Bernard Parish is a proud, tight-knit community that has worked tirelessly to rebuild and grow since Hurricane Katrina. Our industrial businesses play a vital role in our economy, providing well-paying jobs and significant tax revenue, all while respecting and supporting the fabric of our community. These businesses contribute to our success; they don't threaten our future.

The proposed Louisiana International Terminal would completely disrupt this balance. This project is in the wrong location, with grossly inadequate infrastructure to support it. It would overwhelm our roads, drive away residents, and hurt the small, locally owned businesses that are the heartbeat of St. Bernard. These mom-and-pop shops are more than businesses; they are what make our parish feel like home.

For many in our community, moving away is not an option. A project like this would leave the most vulnerable residents with nowhere to turn trapped in a parish where opportunities

have dried up and prosperity feels out of reach. This is not just a threat to our infrastructure. It is a threat to the very identity and future of St. Bernard Parish.

We have fought too hard and come too far to see our community dismantled by a project that does not belong here. This is about more than a port; this is about protecting the soul of St. Bernard Parish and the people who call it home

### **Inadequacy of Notice**

As an initial matter, St. Bernard Parish notes that the Notice provided by USACE lacks adequate information regarding the LIT to allow the public to comment meaningfully. The only information provided are a skeletal description and a set of engineering sketches. No information is provided about the scale of the operation, the size and number of vessels anticipated, whether vessels will be connected to shore power, the number and frequency of trucks and railcars, the timing of construction, the hours of operation (presumably 24/7), the potential third party businesses on site, and a host of other important information required to properly analyze the potential impacts of the terminal. There is no indication whether USACE is considering only Phase I of the proposed LIT development or the entire proposed development. Any attempt to piecemeal this project would clearly violate NEPA. The Notice does not even inform the public where in the NEPA process this application is. Since no draft Environmental Assessment has been published for public review, this comment assumes USACE is in the process of conducting an Environmental Assessment. To the extent this assumption is wrong, that is a further indication of the inadequacy of the Notice.

### **Economics**

There has been no detailed market demand analysis released for the proposed new ULCV port. It is impossible to analyze PONO's claims and adequately weigh potential economic benefits without determining the market demand for increased container and intermodal rail imports and exports.

It has been shown that unemployment and poverty rates increase within a 7.5 mile radius of shipping terminals, which area encompasses the entire economic heart of St. Bernard Parish. Property values near the facility will drop for all the reasons stated below, and blight will increase.

The adverse economic impacts would be certain and significant, while the beneficial economic impacts are entirely uncertain. An EIS is necessary to consider fully the economic costs and benefits.

## **Insurance Rate and Availability Concerns**

### ***Auto***

Insurance companies base rates on many factors. One of the main factors is claims frequency in a specific area, which causes the insurance models to change. Increased traffic on our roads would have a strong likelihood to increase claims in St. Bernard Parish.

Property damage claims – Even absent a collision, an increase in flying debris would cause windshield damage and physical damage to vehicles.

Collision - Studies show that an increase in road traffic directly increases the potential for collisions. Increase in traffic and weight/tonnage on the roads will also damage the infrastructure of our already deteriorating major highways. This will cause more collision claims due to potholes, uneven roads, tire blowouts, swerving, etc. This also creates an environment for heavy traffic and frustrated drivers, which historically lead to collisions. This will be exacerbated by the delay in first responders' response times, leading to longer periods of unsafe conditions, leading inevitably to even more accidents. Auto insurance rates will rise because of the LIT induced traffic.

### ***Homeowners / Commercial / Flood***

Any additional damage or erosion to our wetlands, which provide natural wind/storm surge protection, will result in more wind exposure and flooding, resulting in more and larger claims, and as a consequence higher premiums. Residents are already leaving St. Bernard Parish, due to insurance premiums. Any increase in premiums would directly impact the retention of homeowners, businesses, and residents. This would affect our census numbers and traffic studies. Larger businesses look at these studies to determine if they want to invest in St. Bernard Parish. There are some insurance companies that recently stopped writing business insurance policies in St. Bernard Parish, which makes it more difficult to attract quality retailers.

Louisiana is already struggling to attract new insurance companies to do business here. With the increase in claims and exposure, our state will most likely be taken off the radar for A rated companies. Many companies have restrictions on the amount of business they write in a certain area, (St. Bernard Parish being one), due to claims exposure. Any added concerns could cause the insurance companies to price themselves out of the market or pull out altogether.

These are significant economic impacts that must be studied and weighed in a full EIS.

### **Aesthetics**

The proposed ULCV port will result in multiple, severe, adverse impacts to the quality of life of the people of St. Bernard Parish. The town of Violet is a quiet, largely residential neighborhood. If the port is approved there will around-the-clock impacts that will destroy the essential character of the town. Container ships, cranes, terminal tractors, forklifts used to move

containers, and bright lights will operate all day and all night. There will be increased noise, both from the port itself and the truck and rail traffic, increased light at night, and a visual eyesore directly adjacent to neighborhoods, parks, a national scenic byway, historic properties, a recreational walking path, and a historic cemetery. Container storage yards are havens for insects and rodents which spread into surrounding neighborhoods and cause disease and other unpleasant impacts. Blight is common around ports for all the reasons stated in this comment. The entire character of the surrounding neighborhoods, and potentially the entire Parish, will deteriorate.

No beneficial aesthetic impacts can be anticipated. Given these significant adverse impacts, a full EIS should be conducted to determine their severity and weigh them.

## **Environmental Concerns**

### ***Air***

Air pollution is a significant impact of port facilities. Mobile sources at ports release pollutants including particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), volatile organic compounds (VOCs) and air toxics. Mobile sources of air pollution at the port will include: trucks, marine vessels, locomotives, and cargo handling equipment, among others.

Air pollution of this nature is damaging to human health, particularly for at-risk populations such as children, the elderly, and those with pre-existing conditions. Air pollution also damages our environment. For example, ozone can damage vegetation, adversely impacting the growth of the plants and trees of our vital and fragile wetlands. These impacts can reduce the ability of plants to uptake carbon dioxide from the atmosphere and indirectly affect entire ecosystems. Further, emissions from the port and destruction of wetlands would exacerbate the climate change impacts that will be disproportionately born by St. Bernard Parish.

Because the vast majority of pollution will be from mobile sources, it is not anticipated that the port will be required to obtain a Clean Air Act permit. Neither LDEQ nor EPA will have any input or control over these emissions.

### ***Trucks***

It has been conservatively calculated that the truck trip volumes generated by the container terminal could reach 1,728 per day at full capacity, moving up to 2,000,000 TEUs per year through upper St. Bernard Parish and the surrounding area. This will result in a large increase of diesel emissions that will degrade the air our residents and visitors breathe.

Diesel engines emit pollutants including fine particulate matter (PM), oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs). In the presence of sunlight, NO<sub>x</sub> reacts with VOCs to form ozone (smog). Exposure to emissions from diesel engines can contribute to significant health problems and can include the following potential health effects.

Exposure to:	Potential Health Effects
Particulate Matter	<ul style="list-style-type: none"> <li>• Respiratory illness and asthma</li> <li>• Cardiovascular disease</li> <li>• Heart attacks</li> <li>• Strokes</li> <li>• Premature death</li> <li>• Birth defects, low birth weights and premature birth</li> <li>• Cancer</li> </ul>
Oxides of Nitrogen	<ul style="list-style-type: none"> <li>• Inflammation of the airways</li> <li>• Exacerbation of allergies</li> <li>• Asthma</li> </ul>
Ozone (smog)	<ul style="list-style-type: none"> <li>• Decreased lung function</li> <li>• Respiratory illness and asthma</li> <li>• Premature death</li> <li>• Chronic respiratory illnesses (e.g., emphysema and bronchitis)</li> </ul>

Diesel engines also contribute to the production of greenhouse gases, which are a factor in climate change, which, again, disproportionately impacts St. Bernard Parish.

#### *Marine vessels*

The vast majority of Category 3 vessels docking in U.S. ports are foreign flagged vessels whose emissions are not regulated by the EPA. Unregulated Category 3 marine diesel engines, like those that power the ULCVs PONO wants to bring to St. Bernard Parish, generally use heavy bunker fuel with high sulfur content and high ozone precursors (NO<sub>x</sub>) among other dangerous pollutants. St. Bernard Parish is already in nonattainment for the SO<sub>2</sub> NAAQS. Studies show that ports routinely cause an increase of SO<sub>2</sub> emissions of hundreds to thousands of tons per year. Allowing the siting of an ULCV port in St. Bernard Parish may violate the Louisiana State Implementation Plan (SIP) and the Clean Air Act. It would certainly cause a significant adverse impact to air quality and public health that should be thoroughly considered in a full EIS.

## *Rail*

Locomotives typically run with diesel engines that emit nitrogen oxides and particulate matter, both of which are known to harm human health—and even cause premature death. The problem is particularly severe for locomotives that operate within rail yards, making short transfers or assembling trains, because they stay in a small area and are commonly the oldest, dirtiest ones in service. It is unclear how exactly LIT will handle the loading of trains, but it seems likely that, once again, the communities of St. Bernard Parish will suffer a disproportionate adverse impact.

## *Water*

Port operations can have a significant impact on water quality and the health of marine life. Waste from ships and other port activities can result in loss or degradation of habitat areas and can also harm marine life. Known impacts of port operations include:

**Wastewater:** Ships periodically release sewage, wastewater and bilge water, which is wastewater that is often contaminated with oil.

**Ship paint:** Leaching of toxic paint additives, meant to prevent barnacles from clinging to ships, can result in health impacts on marine life.

**Stormwater runoff:** Stormwater runoff gathers pollutants from paved surfaces at the port and deposits them in the water, often bypassing wastewater treatment plants.

**Nitrogen:** Nitrogen is the leading cause of eutrophication in marine systems, where algae blooms use up oxygen in the water and cause fish and shellfish to die.

**Oil spills:** Oil contamination can include chronic pollution from runoff, bilge water, and the loading and unloading of oil tankers, as well as larger spills resulting from overfilling tanker ships or tears in a ship's hull.

**Dredge/dredging:** Removing sediment to deepen ship channels can increase the cloudiness of water and disturb contaminated bottom sediment, harm or permanently destroy critical wildlife habitats, and disturb or kill threatened and endangered species.

**Invasive species:** Marine animals can be taken into ships through ballast water that is used to help maintain ship balance and then transported across the world to new habitats where they may become invasive species that threaten the balance of natural ecosystems.

In addition, significant dredging of the Mississippi River may slow down flow, thereby increasing the extent of salt-water intrusion. This would directly impact the drinking water of St.

Bernard Parish, among others. These are all significant adverse impacts that the proposed ULCV port can be expected to bring, and they must be thoroughly considered and weighed in a full EIS.

### ***Wetlands***

St. Bernard Parish's wetlands are critical for a host of reasons including drainage, flood protection, shoreline erosion control, wildlife habitat, recreational use, and natural beauty. Wetlands provide natural hurricane protection, storm surge protection, habitat to many birds, fish, and other wildlife, opportunities for fishing, recreation, and ecotourism, and act as a natural filter in keeping nutrients, sediments, and other materials from entering other water bodies. Importantly to the Louisiana coast, wetlands also provide natural floodwater storage and flood peak drainage. Louisiana's coastal wetlands provide protection from the strong wind and storm surges of hurricanes. It is estimated that every 2.7 miles of wetlands reduce a storm surge by one foot. Data from past hurricanes indicates that the loss of every one-mile strip of wetlands along the coast, results in an estimated \$5,752,816 average annual increase in property damage.

The value of coastal wetlands in the state was estimated by the State of Louisiana to be between \$86,040/acre/year - \$143,400/acre/year in 1998.<sup>1</sup> That represents \$166,533.85/acre/year - \$277,556.42/acre/year in today's dollars.

The proposed ULCV port would directly destroy, fill, and pave 428 acres of primarily bottomland hardwood wetlands.<sup>2</sup> In fact, a large portion of the site appears to be valuable wetlands. There is a suggestion that PONO will obtain credits from a wetland mitigation bank in the watershed, but no such bank exists. The only bank in the watershed, in Orleans Parish, not St. Bernard Parish, has no bottomland hardwood credits available. There has been no development of a Permittee Responsible Mitigation Plan for the public to evaluate. Allowing the filling of these wetlands in this circumstance would be contrary to law.

Further, developing the property as the port proposes would likely impact wetlands offsite as well by changing drainage, increasing and contaminating run-off, impacting fish and wildlife conduct and habitat, and generally degrading this critical resource. The proposed retention pond on site is nowhere near adequate to counteract these detrimental effects.

Taking the average estimated value of \$222,045 per acre per year, the 428 acres of wetlands directly filled by the proposed project would equate to \$95,035,260 per year, or \$2,851,057,800 over the projected 30-year life of the terminal; an order of magnitude more than the \$266,161,757.50 that PONO estimated the terminal would generate when applying for

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<sup>1</sup> <https://lucec.loyno.edu/how-do-we-place-value-wetlands>, *citing* Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Wetlands Conservation and Restoration Authority. 1998. *Coast 2050: Toward a Sustainable Coastal Louisiana*. Louisiana Department of Natural Resources.

<sup>2</sup> It is unclear from the notice whether this 428 acres is related to Phase I of the proposed terminal or the entire proposed plan.

funding. These costs must be taken into account, and the result of that cost/benefit analysis is indisputable.

The impacts on our air, water, and wetlands will be very significant and permanently adverse. These impacts must be thoroughly considered and weighed in a full EIS.

### **Environmental Justice**

According to EPA's Office of Environmental Justice, "environmental justice [...] will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work."

Executive Order 12898 requires that federal agencies shall, to the greatest extent practicable, identify and address disproportionately high and adverse human health or environmental impacts from their programs, policies, and activities. This obligation extends to NEPA reviews and to activities such as permitting and rulemaking.

The ULCV port is proposed to be built directly in and adjacent to a predominantly African American community. It is proposed to be built adjacent to a historic African American cemetery and directly on top of a historic African American School. Our African American residents should not be forced to bear a disproportionate share of the impacts from a massive inappropriate facility and all the consequential impacts that it entails. This is particularly so when better alternative sites exist.

### **Historic Properties**

The Louisiana Historic Resource Inventory has identified 18 historic standing structures within two miles of the proposed terminal. Pursuant to Section 106 of the National Historic Preservation Act of 1966, the effects of the LIT on these properties must be considered and accounted for as part of the full EIS required for this project.

Further, the Sebastopol Plantation, the Louis A. Ducros Historic Museum and Research Library, the Kenilworth Plantation, and the Los Isleños Museum Complex would all suffer significant adverse impacts.

### **Land Use**

In land use regulation, a "nuisance" is considered an activity that disrupts an individual or community's "right to quiet enjoyment" of their space or property. Light and noise pollution created by port operations are a sample of the nuisances that will affect the daily quality of life of communities near the proposed port. Light and noise pollution have also been linked to health impacts such as hearing impairment, high blood pressure, and sleep deprivation.

In addition, light and noise pollution may impact wildlife. Noise from ship engines can disrupt important habitats, leading to impacts on bird feeding and nesting sites as well as marine

mammal hearing and behavior patterns. Light pollution can also disrupt biological rhythms, leading to high mortality in bird populations.

The proposed siting of the LIT in Violet is contrary to St. Bernard Parish zoning regulations and land use plans. It is only by fiat that PONO has transformed this residential and commercial area into heavy industrial.

These are significant adverse impacts that should be fully considered in an EIS.

## **Navigation**

The LOCUS navigation study indicates that it would be unsafe for 400-meter length ULCV's to disembark from the proposed port unless parts of the historic 9-mile anchorage across the river are destroyed. This is obviously a significant adverse impact, and it should be fully considered and weighed in an EIS.

## **Recreation**

The proposed terminal would directly, significantly, and adversely impact a local park, a walking trail the Parish is in the process of completing, as well as recreational fishing and hunting.

## **Traffic and Roads**

### *Increase Traffic and Reconfiguration*

Because of St. Bernard Parish's limited railway capacity, the proposed port will depend heavily on trucks to move its containers from the port and through the Parish. Even if the amount of traffic maxes out at the two million twenty-foot equivalent units (TEUs) suggested in PONO's Joint Permit Application, which is potentially a significant underestimate, this would unleash thousands of additional semi-trucks on St. Bernard's roads **per day**. Exactly how many is unknown. Such a drastic increase would have potentially catastrophic consequences for our citizens, businesses, and visitors, including but not limited to, increase to already bad congestion, increased traffic accidents, deteriorating roads and other infrastructure, and increased strain on first responder resources.

Further, the increase in rail traffic would exacerbate the congestion at crossings. PONO conservatively estimates that the LIT would lead to a fifty percent increase in rail traffic and that the duration of crossings of and average length of trains will be impacted. This impact has been projected at trains that are three miles long traveling at four mph, which would result in both Judge Perez and St Bernard Hwy being blocked by a train for 45 minutes or more. This would effectively cut off access to emergency services like fire and police protection, as well as access to St. Bernard Parish Hospital for Ninth Ward residents. St. Bernard Parish does not have a level one trauma center, and emergency response trips to University Medical Center or Children's Hospital with victims of heart attacks, strokes, shootings, stabbings, and other serious injury will

be long delayed, with predictably severe impact on victims. In 2023 alone, Acadian Ambulance, St. Bernard's EMS provider, made more than 950 trips across the tracks to these two hospitals alone.

Any eventual traffic impact study conducted regarding the proposed port must adequately extend the impact area to include, at least, impacts all the way through Arabi and into the Lower Ninth Ward to the St. Claude Ave Bridge and the Claiborne Ave Bridge, if not beyond, and must address scheduled closures and openings of each bridge and the likelihood and frequency of unscheduled closures and openings.

Further, elevated roadways, like the one PONO now proposes to transform scenic St. Bernard Highway into, are well known to have numerous adverse impacts on the surrounding community. Overpasses displace communities and businesses. Much like ports themselves, overpasses contribute to economic downturn in the surrounding community. Elevated roadways increase noise pollution from traffic by as much as forty percent. Elevated roadways have been shown to slow the flow of traffic. Lastly, the St. Bernard highway overpass would put several historical districts in danger due to its proximity. The approach and ending would be within feet of areas that have won several historic awards.

The adverse impacts from increased traffic and roadway reconfiguration will be enormous and must be considered and weighed in a full EIS.

#### *Concurrent Projects / Cumulative Impacts*

The PBF Bio-Diesel project began operations in 2023. One result has been an unexpected, up to four-fold, increase in rail traffic on a rail spike that bisects the only two east and west corridors in and out of St. Bernard Parish. PONO projects the LIT would increase traffic by, conservatively, another fifty percent to six times pre-PBF Bio-Diesel on this rail spike.

The Bayou Bienvenue Bridge Restoration is currently expedited and scheduled to take place concurrently with the construction of the proposed LIT. The bridge restoration is scheduled for two years starting in 2025 or 2026. This project will limit North and South traffic to one lane in and out. Furthermore, load restrictions will not allow the passage of large trucks associated with current industrial activity nor any trucks associated with the construction of the LIT project.

The most significant and concerning project to consider is the Inner Harbor Navigation Canal Lock replacement. A required traffic study shows that the bridges would have to open simultaneously due to length of tows. Construction is set to break ground in 2029 with a duration of 11 years. The proposed permanent mitigation for the traffic impacts of the project is the erection of blinking signs at Paris Road notifying residents and business patrons that the bridges are up. The study additionally concedes that due to river level water being pushed back to Florida Ave., there would be a doubling of openings at Claiborne.

The development of the Alabo Wharf in the Lower 9th Ward is yet another concurrent project to take into consideration. Sunrise Food International will be operating the wharf sending multiple 10 car trains from the river to St. Claude Ave, and then east on St. Claude to exchange in the rail yard in Arabi. Each train will block the entire Historic and Cultural Arts District of Old Arabi from the rest of the world by cutting off the path east to the city in crossing the highway and west at the entry point to the rail yard. Residents will have no ingress or egress, and, more importantly, will not be accessible for emergency services. It has recently been revealed that there are two further phases of development that will increase rail traffic by an unknown amount.

The cumulation of these existing and planned projects already confronts St. Bernard Parish with a traffic and public safety nightmare. The LIT would exacerbate the problem substantially. These serious impacts must be thoroughly developed, considered, and weighed in a full EIS.

### **Public Safety**

The proposed ULCV port would be a potential public safety nightmare. Port terminals, freight transportation corridors, loading facilities, container inspection facilities, container storage yards, warehouses, marine fuel, oil, and gas storage terminals and toxic and hazardous cargo all pose significant risks of accident, both on-site and off. If there is a major incident, public service providers such as police, fire department, and paramedics will be diverted to the port and unavailable to the citizenry. Increased public hazard risk factors are numerous, including, but not limited to: ship breakdowns or loss of power that could lead to collisions, allisions, and spills; train wrecks or derailments with the possibilities of explosions and toxic chemical spills; truck accidents, breakdowns, spills, and fires; petroleum fuel storage and pipeline fires, explosions, and spills; an attractive target for terrorist attacks in the middle of a residential area; and increased impacts from hurricanes and flooding.

The Parish is concerned that the fire department, to take one example, would need, at a minimum, a hazmat team and equipment, marine firefighting equipment, specialized training and increased staffing, updated fire stations or new ones located near the port for rapid response, environmental monitoring tools to detect and manage air and water pollution during emergencies, and more fire hydrants. The Sheriff's office would also require more manpower to deal with the effects of the increased traffic. The fact that the port will not pay property taxes makes these increased public costs a significant burden on the remaining residents and businesses that do.

All of these significant adverse impacts must be developed, considered, and weighed in a full EIS.

## **Property Ownership**

PONO states in the Joint Application that it is the sole owner of the property to be developed.<sup>3</sup> That is patently false as the application also states: “The project also anticipates local relocation of the W. Smith Jr Elementary School and Violet Number 2 Park.”<sup>4</sup> The St. Bernard School District does not agree to move the W. Smith Jr. Elementary School and sell the land it currently occupies. In fact, it is prohibited by law from doing so. The District has sued PONO to enjoin any attempt to exercise eminent domain against the property of a co-equal political subdivision or develop the site according to the current plans. It would be unlawful to issue a permit for a project on land that PONO does not and cannot own. PONO also does not own St. Bernard Highway, the railway, the Boardwalk Pipeline Company’s servitude on site, or the five residences currently located on the proposed site.

The issue of lack of ownership is particularly glaring in this application. The St. Bernard Parish Government adopts and incorporates the comment of the St. Bernard School District into its own. The proposed terminal cannot be legally permitted as currently configured.

## **Alternative Siting**

Given all the significant adverse impacts the proposed terminal would have on St. Bernard Parish, serious consideration must be given to alternative siting. Consideration should not be limited to sites within PONO’s jurisdiction; rather it should analyze all potential sites that could accomplish the goals of the LIT as well as or better than Violet, with less destructive impact. For example, a deep-water port in the Gulf of Mexico, Port Fourchon, and the Plaquemines Port Harbor and Terminal District being developed by the Plaquemines Port and APM Terminals would all be preferable to the Violet location for an ULCV terminal for a host of reasons. Whether as part of an EA, a 404 permit, or a full EIS, the availability of alternative, more appropriate sites must be given serious consideration. These alternatives weigh heavily against approving this project.

## **Request for Extension and Public Hearing**

Because the Public Notice was released in the heart of the holiday season, the effective ability of the community to take notice, investigate the proposal, and comment has been impaired. The proposal is complex and the notice provides little detail to alert the public of that complexity. Further, the Notice only provides 29 days from publication to submit comments, which is contrary to regulation. St. Bernard Parish Government requests that the comment period be extended 60 days to March 15, 2025 to give the people a fair chance to provide information and make their opinions known. Further, due to the widespread public interest in this project, as evidenced by the volume of comments in opposition already submitted, St. Bernard Parish

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<sup>3</sup> See step 12 of 15 of Joint Application.

<sup>4</sup> See Step 5 of 15 of Joint Application.

Government requests that a public hearing be held to allow the public to express their concerns and opinions for the benefit of the USACE, PONO, and each other.

Respectfully Submitted,

**Waltzer Wiygul & Garside, LLC**

A handwritten signature in black ink, appearing to read "Clay Garside", written over a horizontal line.

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# PROPOSED PONO LOUISIANA INTERNATIONAL TERMINAL (LIT) CONTAINER TERMINAL, VIOLET, LA ***CRITICAL DEVELOPMENT ISSUES OVERVIEW REPORT***

JANUARY 15, 2024

## Abstract

This Louisiana International Terminal (LIT) Critical Development Issues Overview Report was commissioned to identify significant detrimental concerns with the Port of New Orleans (PONO) proposed LIT Container and Intermodal Rail Terminal for Violet, LA, and the project development attributes according to the information submitted to the U.S. Army Corps of Engineers (USACE) in support of the PONO project permit application submittal.



# PONO LIT CONTAINER TERMINAL, VIOLET, LA CRITICAL DEVELOPMENT ISSUES OVERVIEW REPORT

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## **PONO's LIT Critical Development Issues Overview Summary Findings**

### **INTRODUCTION - PREAMBLE**

This **Critical Container Terminal Development Issues Overview** was prepared by Vickerman & Associates, LLC under a consulting agreement commissioned by the St. Bernard Parish Government for the reference and use by the constituents of St. Bernard Parish. This Critical Container Terminal Development Issues Overview Report is intended as a public briefing and resource presentation for the citizens of St. Bernard Parish regarding the conclusions and finding of the Vickerman & Associates critical analysis and evaluation of the Port of New Orleans (PONO) proposed Louisiana International Terminal (LIT) container and intermodal rail terminal development in Violet, LA.

In the opinion of this Critical Development Issues Overview Report, **the PONO neglected to conduct and/or share crucial project due diligence information and justification analysis to properly support this mega container and intermodal rail terminal development proposal**, including, but not limited to, a detailed market cargo demand analysis which is fundamentally critical to evaluating the need for any modern successful marine terminal development project, and particularly required for the citizens of Louisiana, the constituents of St. Bernard Parish, and for deliberations involving the USACE permit application submittal.

Nevertheless, based on an economic development impact analysis report commissioned by the Port of New Orleans, it can be calculated that the **truck trip volumes generated by the container terminal could reach 1,728 per day** at full capacity. These tremendous daily truck trip volumes would negatively impact southeastern Louisiana traffic congestion, regional vehicular safety, and could deleteriously impact environmental air quality.

Because **the current project will result in substantial and potentially deleterious public health, safety, environmental and traffic impacts on the citizens of St. Bernard Parish**, a cohesive and compelling regional statewide strategy focused on conducting a thorough proper terminal site selection evaluation is critically needed. Not conducting such a **comprehensive site selection analysis** would be a strategic mistake for the State of Louisiana, and indeed the nation, now more than ever.

This Critical Development Issues Report urgently recommends that a **development advisory committee** should be formed to critically assess the market driven economic viability and needs assessment for a mega container port development in southern Louisiana. This Overview Summary endorses a proposed location and conceptual development plan for the intermodal container project, which must include state-of-the-art marine container and intermodal rail terminal capabilities and terminal characteristics.

This expert development advisory committee is urgently necessary considering the **many prior market demand analysis reports reflecting the region's lack of a local population consumption market which would be needed to successfully support the magnitude of the intermodal container terminal complex proposed by the Port of New Orleans at the Violet riverfront site**. The comprehensive terminal site selection evaluation is also **necessary to ensure that the proposed intermodal container terminal is located at a superior and more optimal terminal site further downriver than the proposed site in Violet to avoid the potentially deleterious harm that will otherwise result to the stakeholders, citizens, constituents, and taxpayers of southeastern Louisiana**.

### PONO LIT TERMINAL MULTIPLE LAYOUT AND DESCRIPTION MODIFICATIONS:

The PONO proposed \$1.8 billion LIT Container Terminal Development Project in Violet, LA has been significantly revised multiple times by the PONO since the December 2021 PONO USACE permit application submission.

This LIT Container and Intermodal Rail Terminal Project **Critical Development Issues Overview** is primarily based on recent Freedom of Information Act (FOIA) responses from the USACE and other related US Public Port Authority and maritime industry public information and data.

### PRESUMED PONO CURRENT LIT TERMINAL LAYOUT AND CHARACTERIZATION:

Since the December 2021 submittal to the USACE, the PONO has made major changes in the LIT terminal layout several times. As of the publication of this Critical Development Issues Overview Report, the following terminal plan and artist's rendering are believed to be reflective of the most recent PONO's latest LIT Terminal layout recommendations. These latest project changes differ substantially from the December 2021 PONO USACE project permit submittal.

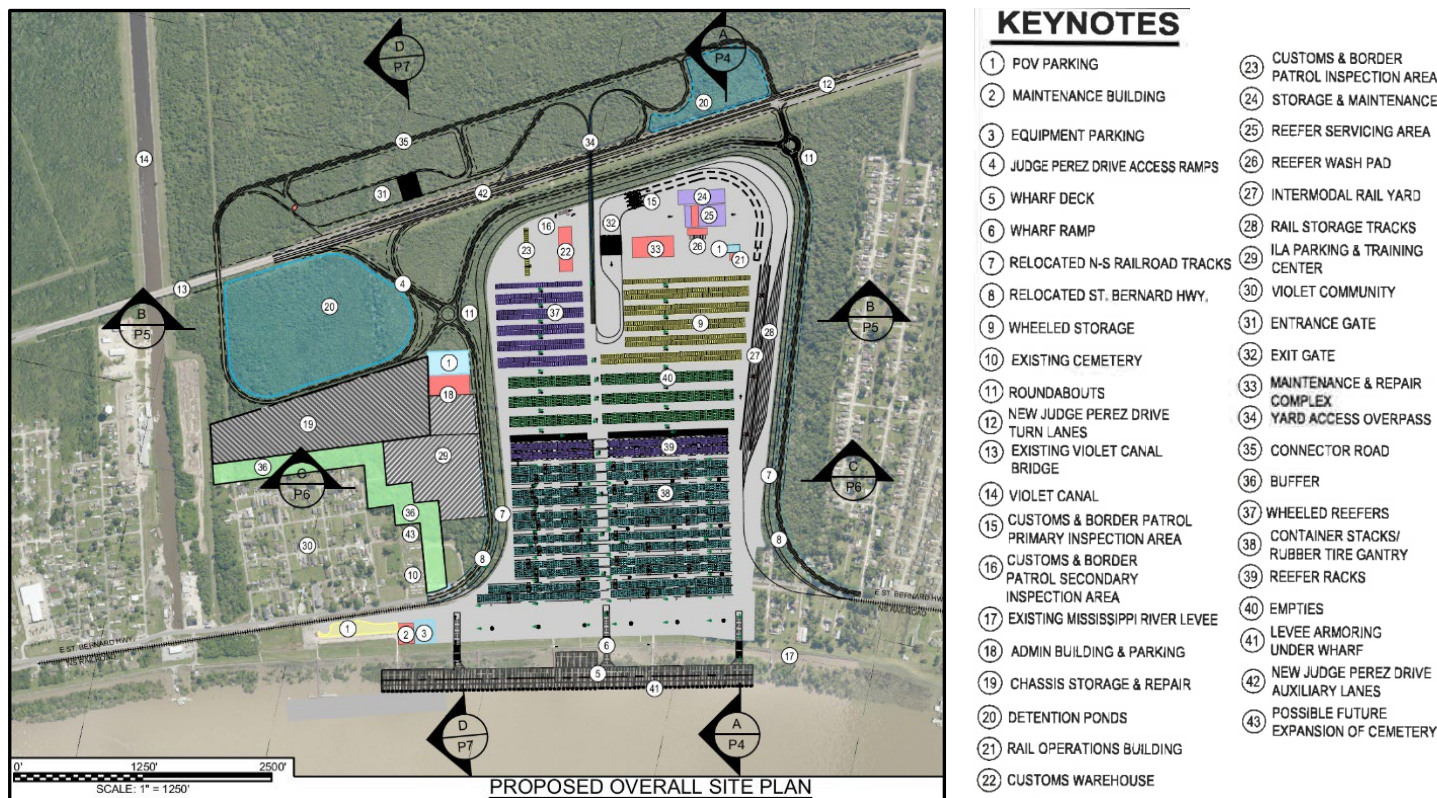


An artist's rendering of the latest proposed PONO LIT terminal development follows:



## A. PONO DECEMBER 2021 USACE PERMIT SUBMITTAL DETAILS

The USACE published a public permit announcement for the LIT project on January 24, 2022, based on the Port NOLA (PONO) permit application for development of a commercial container terminal (Permit # MVN-3032-00270-EG – AECOM Drawings dated 11/8/2021) in Violet, LA as illustrated below:



At River Mile 83, the LIT permit calls for a total of 3,600 lineal feet of a new pile support wharf/quay with three berths (two vessel berths + one barge berth), and three terminal truck access ramps. Berth lengths: berth # 1: 1,500 ft., berth # 2: 1,500 ft., and berth # 3: 600 ft.) serviced by ten wharf/quay 100 ft. gage ship-to-shore (STS) electric cable reel gantry cranes.

The container yard has approximately 36 mobile yard gantry cranes (each crane spanning a 7 containers-wide stack by six containers high + one pass-over container and one truck lane). The project also includes 1 million cubic yards of native soil excavation; 3.9 million yards of hauled-in sand; and 61,119 cubic yards of riprap stone armoring protection over the riverbank slope. 404 acres of wetlands banking credits from USACE mitigation bank would be used. Estimated total potential LIT operational terminal gross acreage, including wharf/quay and access ramps, is 561 acres – Reference: AECOM Drawing P3 and P13 dated 6/4/2021, Job No. 60637450; Potential Terminal Boundary Impact (+/- 316 acres); + Additional Potential Terminal Area Impact (+/- 245 acres).

## B. LIT MARKET DEMAND AND FUTURE CARGO FORECAST ANALYSIS

There was **no LIT container and intermodal rail market demand analysis report submitted to the USACE by the PONO**. The following overview data was derived from a recent USACE FOIA response based on an economic development analysis prepared in the spring of 2021 in a report titled,

*“Louisiana International Container Growth: The Economic Impact of the Louisiana International Terminal Complex”* prepared by Dr. Dek Terrell, Ph.D. of Lewis Terrell and Associates.

Dr. Terrell's report assumes an anticipated \$1 billion construction project for LIT and also assumes that a fully operational LIT with a "two berth container facility has a **capacity of handling 2 million TEUs (twenty-foot equivalent unit ISO containers) per year.**") The conversion rate for container lifts in Dr. Terrell's report is 1.62 TEUs/Lift with 2019 as a base year (1,234,568 container lifts). The economic impacts in Dr. Terrell's report are predicated on estimated construction costs occurring from 2021 – 2031, and operations from the anticipated opening of the first LIT berth and the following 22 years, from 2028 – 2050.

Dr. Terrell's **2050 Total PONO container forecast** throughput volume in 1,000s of TEUs is as follows:

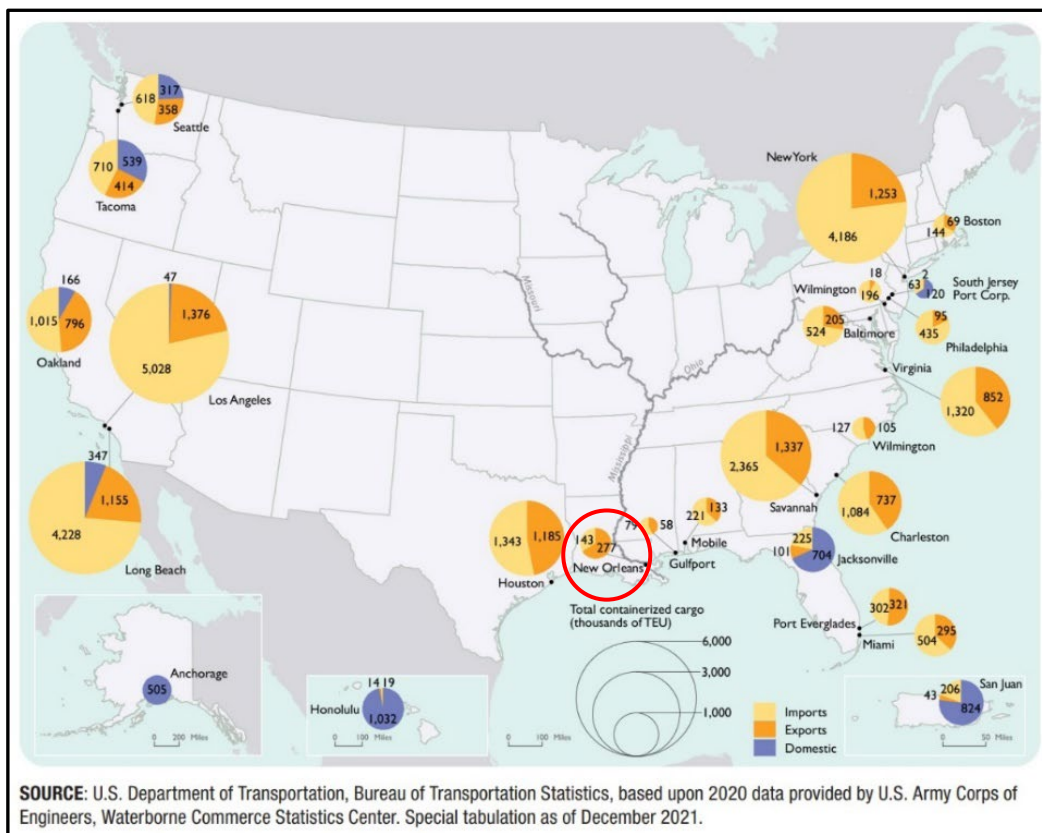
Imports: 317.2 TEUs (15.5%); Exports: 957.9 TEUs (46.8%); Empties: 768.7 TEUs (37.6%)  
**Total: 2,045.9 TEUs** (note the dominant export/import ratio of 3 to 1).

The PONO's current Strategic Master Plan, published in Spring 2018, indicates the PONO container throughput forecast as follows:

**High Forecast:** 865,000 TEUs; **Base Forecast:** 710,000 TEUs; and **Low Forecast:** 645,800 TEUs.

The **2020 and 2023 Port Performance Freight Statistics Program: Annual Report to Congress** prepared by the Bureau of Transportation Statistics ranks PONO as **number 18** on the list of top 25 container ports by TEUs in the U.S. as illustrated below. Note the PONO comparative volume size.

As depicted in the graphic below, the LIT throughput volume of 2 million TEUs would be larger than the current throughput of the entire port complex of Charleston, SC, and slightly less than the entire port complex of the Virginia Port Authority (VPA), Port of Virginia.



### C. ESTIMATED LIT TRUCK TRAFFIC VOLUME (TRUCK-TRIP GENERATION CONCERNS):

Tremendous truck-trip volumes will have a direct bearing on future traffic congestion, safety and environmental air emission concerns along local highways and local arterial roads. Commodity-based truck-trip modeling is the current state of the practice in statewide USDOT modeling. Commodity-based trip rates are rarely published and are difficult to derive from available public data. Vehicle-based models are the most frequently used technique for estimating trip generation at the metropolitan level. The variation in truck classification categories, land-use categories, and trip type categories makes it difficult to compare trip generation rates from one study and area to another.

Ports and Intermodal Terminal Data Sources utilized below were derived from truck-trip generation national rationale and methodology recommended by the:

U.S. Transportation Research Board (TRB)  
NATIONAL COOPERATIVE HIGHWAY RESEARCH PROGRAM (NCHRP)  
**NCHRP SYNTHESIS 298 - “Truck Trip Generation Data”**  
Chapter 3 - Port and Intermodal Terminal Data Resources

Use of the criteria contained in NCHRP Synthesis 298 for truck forecasting typically requires a detailed trade econometric forecast analysis. However, no detailed LIT market demand analysis has been provided by PONO and forwarded to the USACE for the LIT permit analysis. This Critical Overview Summary will use the USACE FOIA Response prepared by Dr. Dek Terrell, Ph.D. wherein it is stated that the LIT project as a “two berth container facility has a capacity of handling **2 million TEUs** (twenty-foot equivalent ISO containers) per year (refer to top of page 2 of this Critical Issues Summary).

LIT Development 2050 annual throughput capacity: ..... **2 million TEUs**

LIT Annual On-Dock Rail Capacity: ..... **300,000 TEUs**  
(assuming similar to the PONO Strategic Plan – Napoleon Ave Intermodal Rail Terminal volume at 15% of the total current terminal capacity)

LIT Development 2050 annual truck only capacity: ..... **1,700,000 TEUs**

**LIT Development Daily All Truck-Trips approximate linear regression: .....1,728 Trucks per day**  
(864 Trucks Inbound and 864 Trucks Outbound Non-Peak Day – assumed One Shift + limitation)

(Total Truck-Trips/Day =  $(2.62 \times \text{Acres}) + 40$ . The adjusted R<sup>2</sup> value was 0.56 with a standard error of approximately ±37 truck-trips. The corresponding generalized all truck-trip rate was 3.08 trips/acre.)

This analysis assumes a LIT (Semi-Automated) Gate Complex typically operates one shift + per day with a vessel at one or more berths and includes truck bobtails, trucks with empty chassis, and trucks with container on chassis. The CN “Carter Ratio” was used for Intermodal Rail Terminal truck-trip generation forecast with semi-automated gate function and reservation system operating one shift + per day with increased shifts when an intermodal Double Stacked Train (DST) is present.

The detrimental impact of 1,728 container trucks per day on local St. Bernard roadways and local arterial roads will be significant on local communities, and especially on local residential neighborhoods in proximity to the LIT. Increased truck traffic volume through local business areas, and industrial districts will no doubt increase urban goods movement auto-truck accident rates for St. Bernard Parish, especially in the vicinity of the LIT terminal entrance and exit truck routes. Air, noise, pollution, and view corridor limitations are all major terminal planning issues.

The proposed St. Bernard Transportation Corridor elevated roadway from LIT to the I-510 Corridor will not handle all of the 1,728 LIT trucks due to local truck traffic origin and destination criteria and typical traffic distribution.

#### **D. THE NEED FOR A COHESIVE REGIONAL AND STATEWIDE APPROACH TO STRATEGIC SOUTHEAST LOUISIANA PORT DEVELOPMENT SITE PLANNING**

The development of a new container terminal port and intermodal rail hub development along the lower Mississippi River in southeast Louisiana is a project of **Statewide and National Significance**. A pragmatic and comprehensive site selection evaluation and analysis is needed in Southern Louisiana now more than ever. Not conducting such a port terminal site development evaluation and analysis by the State of Louisiana represents a strategic miscalculation for the region, the State, and the nation.

As a co-author of the “**Port of New Orleans Millenium Port Development and Investment Study**,” my final report message to the PONO Port Commission and Mr. J. Ron Brinson, President and CEO, is as valid today as it was in late 1999, and even more now. **The Millenium Port statements made in a recommendation letter to the Port of New Orleans continue to serve as an important warning today.**

- Public health, safety, welfare, environmental compliance, and environmental justice should be of paramount concern in addressing port development sites and operating scenarios for future Southeast Louisiana port development. Louisiana port stakeholders and the citizens of Louisiana expect these issues to be addressed thoroughly.
- The context of significant port development going forward should encompass the entire southeast Louisiana region, and clearly include the future prospects of other proposed prominent Louisiana public ports in southern Louisiana.
- **It would be a mistake to approach the future of a major strategic port plan and distribution hub in Louisiana with a theme of one site or region to be considered to the exclusion of all others.**
- A realistic statewide strategic master plan of mega port development for the State seems logical and it should begin with deliberate planning that blends the values and objectives of Louisiana's citizens and marine industry stakeholders/investors/operators in a creative, yet pragmatic port development proactive planning process.
- What is needed is deliberate value-added inspired planning of future port infrastructure development that rigidly follows a discipline of blending and leveraging the State's desire for environmental quality of life values with the State's interests in quality economic development. Such a port planning exercise could lead to a national best in class model for large multi-modal port transportation infrastructure development programing in the U.S.

**The current LIT project being proposed by PONO will result in substantial and potentially deleterious public health, safety, welfare, environmental and traffic impacts on the St. Bernard Parish community and the Parish transport roadway and rail systems. Other more suitable terminal sites within Southeast Louisiana and the lower Mississippi river region could be identified that have superior attributes to the current LIT Violet, LA development site.**

**It would be a mistake to approach the future of strategic port planning in Louisiana with a theme that selects a port development from only one site or one region to the exclusion of all others.**

### Alternative Container Port Downriver Sites:

Starting with the initial PONO MILLENNIUM PORT STUDY list of potential container port sites (please refer partially to the illustration below), a concise list of the **most suitable port development sites can be identified for further analysis and evaluation. A final recommended site suitable for a port and intermodal rail terminal development of Statewide and National Significance can be identified.**



The formation of a stakeholder, subject matter expert (SME) advisory committee to strategically analyze and evaluate port and intermodal rail terminal site location options from many relevant strategic sites in Louisiana is certainly called for considering the potential impacts of this mega container port terminal development. Consider the following vision, mission, and goals for this Louisiana expert port site selection advisory committee:

**Vision:** Convene an experienced expert panel of relevant stakeholders, including industry leaders, governmental officials, and other pertinent port development subject matter experts (SME), to identify and thoughtfully analyze potential port development site locations for a mega Louisiana container port terminal development program with superior attributes.

**Mission:** Thoroughly assess the market driven econometric cargo demand needs and future cargo forecasts of such a port development project and recommend a proposed location site and conceptual development plan for this Louisiana port project of **Statewide and National Significance**.

**Goal:** Determine the location that is in the highest and best interest and use for the State of Louisiana, the region, and indeed the nation.

**Analysis Framework:**

- Long-term viability considering state-of-the-art trends and emerging technologies in the ocean and inland river shipping industries.
- Public health, safety, environmental justice, and public welfare mandates.
- Environmental impacts and long term environmental and economic sustainability.
- The analysis should include evaluation of regional port rationalization concepts and opportunities that have been previously discussed by various Louisiana Port Authorities and the State.

## **E. THE NEED TO EMPLOY STATE-OF-THE-ART INTERMODAL RAIL EQUIPMENT**

Intermodal container shipping continues to be one the fastest growing segments for all Class I railways in North America today. Coast to coast, all major U.S. Port Authority container terminals have developed on-dock, near-dock, or remote Intermodal Container Transfer Facilities (ICTFs), sometimes referred to as intermodal rail terminals or yards. Demand for intermodal rail transportation services continues to grow in North America.

The evolution of intermodal rail terminal equipment is rapidly evolving from top lift - Reach Stackers (RS), Straddle Carriers (SC), and Rubber Tired Gantry (RTG) cranes towards automated Rail Mounted Gantry (RMG) / Wide Span Bridge Cranes (WSC) and nested bridge cranes, following the lead of the largest Class I railroads in North America. The deployment of these RMGs and WSCs is focused on generating high-capacity container storage, retrieval and throughput on smaller and smaller intermodal rail terminal footprints.

The initial PONO USACE LIT permit terminal application plan only proposed conventional smaller intermodal rail terminal equipment on fairly short intermodal rail working tracks. The following photograph depicts a modern high-capacity intermodal rail terminal with WSC equipment. An intermodal container terminal site should deploy today's state-of-the-art high productivity intermodal rail terminal yard equipment to reduce the container terminal footprint and maximize intermodal rail container throughput capabilities. The most recent modification to the LIT layout by PONO may include such equipment.



## **F. SOUTHEAST LOUISIANA LACKS THE LARGE LOCAL POPULATION CONSUMPTION MARKET THAT OTHER MAJOR GATEWAY CONTAINER PORT DEVELOPMENTS HAVE**

The following LED, DOTD, BRAC and GNO, Inc. and PONO previous investigations and analysis regarding container and intermodal rail market demand analysis reports have similar findings and conclusions regarding the future of container and intermodal shipping in southeast Louisiana:

In June of 2009, the PONO commissioned **Parsons Brinckerhoff (now WSP)** to prepare a Strategic Advisory Report titled, “**Napoleon Avenue Container Terminal Development Utilizing Public-Private Partnerships**.” This report forecasted a 20-year containerized cargo demand market growth rate for PONO of only 1%, (a base container cargo forecast of approximately 325,000 TEUs in 2028). Even with a high container market forecast scenario attracting two new Asian container carriers, the total long-term PONO forecast was estimated at 550,000 TEUs.

**Booze Allen Hamilton** issued their final Trade Study Report dated June 11, 2009, to the BRAC and GNO, Inc. in the report titled, “**Strategy to Optimize the International Trade Potential of Southeast Louisiana**.” The report indicated that “Southeast Louisiana’s key trade strength rests with non-containerized trade, with the lack of industrial and consumer demand as the leading weakness. The State’s population has lagged the growth experienced in the rest of the U.S. Local consumption is not the big driver of local trade, the report stated. Industrial activity is below average within the region especially if the petrochemical industry is excluded. Southeast Louisiana captures approximately 7% of the U.S. population within a 500-mile radius compared to approximately 14% for competing ports. The region lacks a cohesive market strategy and lacks a unified vision on trade and the transportation industry.”

Louisiana Economic Development (LED) and DOTD commissioned **ATKEARNEY** to prepare a “**Port Complex Market and Feasibility Analysis**” published December 22, 2009. This report forecast that Louisiana would only “maintain 7% share of the Gulf Container Traffic” even with the opening of the new expanded Panama Canal capability in 2016. The report meanwhile indicated that the Panama Canal expansion would increase traffic to the other Gulf ports.

In the LED and DOTD report, of the 78 market areas analyzed, Louisiana had a low potential opportunity in 58 of the 78 areas. In only 6 of the 78 market areas did Louisiana have a high potential opportunity. The balance of the areas was identified as having a medium potential market opportunity.

### **PREVIOUS LED, DOTD, BRAC AND GNO, INC. AND PONO INVESTIGATIVE CONCLUSIONS:**

The majority of the above referenced containerized market opportunities analyzed for southeast Louisiana and the PONO were pessimistic. In the author’s opinion, the potential for new container and intermodal rail markets for Louisiana could be beneficial for the State and the nation, but these markets require a “Market Driven” mentality that is laser focused on key targeted cargo commodities that are uniquely advantaged and empowered by the southern Louisiana region.

Southeast Louisiana container and intermodal shipping can drive a new potential market centroid for Gulf Centric Logistical Warehousing and Distribution of containerized cargo activity in southern Louisiana, linked directly to the future form of highway distribution of goods via the “Mississippi River Highway” leveraging emerging current container on barge (COB) and new container on river vessel (COV) technologies.

However, the interface between the large mega container ocean vessels and the “upriver marine highway COB/COV” and landside roadway and railroad transfer points, **MUST be located at a more optimal terminal site further downriver than the proposed LIT site in Violet, LA.** The optimal terminal site should not carry deleterious factors and negative characteristics that do not fully serve Louisiana’s container and intermodal shipping stakeholders, and the citizens and taxpayers of Louisiana.

## **G. MARITIME VESSEL SIMULATION OF 23,000 TEU ULTRA LARGE CONTAINER VESSEL “ULCV” WITH 4 AZMUTH STERN DRIVE (ASD) - 70 TON BOLLARD - TRACTOR TUGS**

On January 27-29, 2021, LOCUS LLC conducted two days of maritime vessel simulation using a Kongsberg Full Mission Ship Simulator located at the Maritime Pilots Institute in Covington, LA. This vessel simulation research was conducted on behalf of the PONO for the purpose of evaluating the feasibility of a proposed LIT container terminal located at Mississippi River Mile 83, on the left descending bank, near Violet, LA. LOCUS LLC published a Final Report on August 24, 2021.

The simulation design vessel was a large, heavy **23,000 TEU ULCV model at 52’ of draft** (full load capacity). The vessel was relatively underpowered in comparison to smaller “large” container vessels of 9,000 to 14,000 TEU capacities. The 23,000 TEU ULCV model represents a vessel of 1,312’ x 192’, which is longer in length, wider in beam, and 100,000 tons larger in displacement, than any vessel in current service on the Mississippi River and is beyond Neo-Panamax lock dimensions.

### **MAJOR VESSEL SIMULATION ANALYSIS AND PILOT CONCERNS AND ISSUES:**

#### **CONCERN A. UNSAFE CLEARANCES WITH OPPOSING RIVERBANK ANCHORED VESSELS:**

Vessel simulation studies demonstrated unsafe clearances with anchored vessels under conventional piloting conditions. Given any unforeseen variables in piloting conditions, the **risk of striking a vessel in the 9-mile anchorage is high**. The vessel simulations concluded that **having vessels anchored in the 9-mile anchorage** opposite the proposed LIT container facility berths **poses an unsafe hazard for vessels departing the LIT container terminal berths**.

#### **CONCERN B. UNSAFE UPRIVER DEPARTURE CLEARANCE CONDITIONS:**

During vessel simulation studies departing the proposed LIT berths and proceeding upriver to turn the vessel was simulated. **These maneuvers were not successful due to unsafe clearance issues**, and they took a great deal of time. As such, the vessel simulation did not recommend departing the proposed LIT berth and proceeding upriver to turn. Rather, the vessel simulation recommended turning directly from the LIT berth downriver.

#### **CONCERN C. DREDGING RIVER REQUIREMENT TO 55’ MLLW:**

The vessel simulation for this vessel operational area should be dredged to 55’ MLLW or greater and be regularly surveyed for silting. Additionally, the area downriver of the proposed berth has shallow water that will need to be dredged to 55’ MLLW or greater.

#### **CONCERN D. ADDING A FIFTH TRACTOR TUG FOR HIGH RIVER DEPARTURES:**

In the event of extreme high river conditions, the vessel simulations recommend **adding a fifth tug for departures of this class of vessel**. This would obligate every large tug in the Port of New Orleans. It was recommended that in the planning for this proposed LIT facility, it is imperative to address the availability of capable tugs, including the consideration of providing dedicated tractor tugs for the LIT facility.

#### **CONCERN E. FAILURE TO DEVELOP VESSEL HEADWAY DEPARTING LIT LOWER BERTH:**

The vessel simulation found that when departing from the lower berth in high river water, the vessel failed to develop enough vessel headway through the water to achieve sufficient steerage to safely navigate through the turn in the river below the LIT berth. Under these high river conditions, the use of the tugs to assist the ship in gaining headway in order to gain steerage for the upcoming river turn at 12-Mile point was required.

## SIMULATION AND RIVER PILOT ANALYSIS CONCLUSIONS:

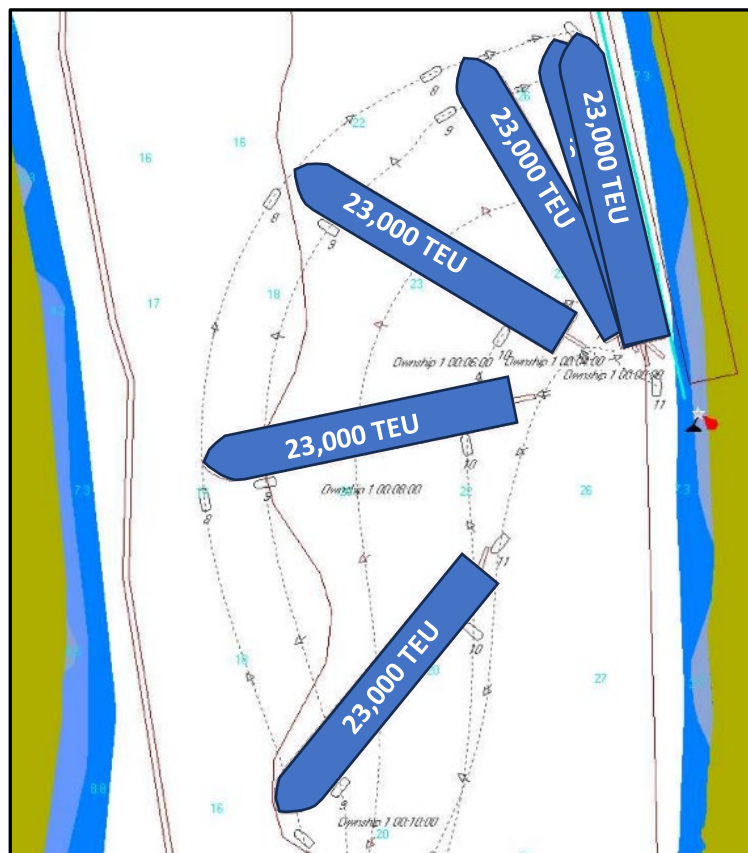
Although the overall vessel simulation and pilot analysis was supportive of the location for the proposed Violet container terminal, the primary concern found in the vessel simulation research and analysis was:

1. **Unsafe presence of anchored vessels in 9-Mile anchorage, opposite the proposed LIT container vessel berths.** Vessel simulations found, if ships are anchored in the lower part of 9-Mile anchorage, it was not safe to turn 400m length ULCV container vessels directly from the proposed berths.
2. Additionally, **mid-stream mooring operations** above the proposed LIT site were found to be unsafe for container vessel operations and for transits of other large vessels passing the LIT container berths. **The vessel simulation and the Pilots do not recommend a mid-stream mooring operation in the area of the LIT Terminal.**

## DISRUPTION TO MISSISSIPPI RIVER COMMERCIAL VESSEL OPERATIONS:

The above conclusions to the vessel simulation and Pilots analysis impact and restrict commercial shipping operations in the vicinity of the LIT Container Terminal at the proposed Violet, LA site.

The following graphic was taken from vessel simulation ***“Run 11a: Undocking Berth 1, No Wind, 5 Kns Current, Day.”*** Please note the departing 23,000 TEU ULCV vessel from LIT Berth #1 will obstruct the majority of the Mississippi River width if the vessel simulation and pilot **Concern B** (previous page) were enforced. As illustrated below, **82% of the navigational river traffic would be completely blocked during vessel departures from the LIT Berth #1.**



## **H. THE NEED TO EMPLOY ALL GREEN TERMINAL – ZERO EMISSION (ZE) EQUIPMENT:**

Any new modern international container terminal project should fully embrace current and future green port terminal technological advances and set a national example of State-of-the Art green container and intermodal terminal equipment operations.

These costs can be controlled by executing a modern professional approach for the electrical infrastructure development that is optimized for the power requirements of the planned terminal handling throughput capacity and operating equipment. This includes a utility plan that leverages the right type and size of the terminal's main components (such as transformers) for the planned power distribution system. Once in operation, the energy costs can be controlled by deploying a professional power management terminal solution.

The power distribution system needs to interface with numerous terminal systems or “nodes” when transporting power to the various consumers of power within the River Container and Intermodal Rail Terminal. Each of these electrical power systems can cause disruptive issues and can deleteriously impact terminal reliable operations.

The key in managing this risk lies in precise interface definition between all terminal electrical utility systems. This should be an integral part of the terminal's strategic electrical infrastructure design and, at minimum for the systems outlined below, should be defined, and integrated into the electrical power distribution system for the following major terminal components:

- Ship to Shore (STS) Wharf/Quay Gantry Crane Electrical Systems.
- Refrigerated Container Storage (Reefer) Control and Remote Reefer Monitoring systems.
- Terminal Backland Building, Entry/Exit Truck Gate and Radiological Portal Monitor systems.
- Terminal Storage Yard and General Area Lighting Systems.
- Terminal Electrical Grid Connection and Utility Grid Protection Schemes.

One of the most demanding interfaces to define is the grid connection as it requires substantial understanding of the Terminal electrical power systems at the national, regional, and local levels.

The following Green Terminal (ZE) equipment section is included as a technical reference for the reader.

### **GREEN TERMINAL– Zero Emission (ZE) and Near Zero Emission (NZE) Terminal Equipment:**

The following reference data was derived from a Port of Oakland commissioned analysis titled “Zero-Emission Cargo-Handling Equipment Feasibility Assessment” by AECOM, published November 21, 2019. The **California Air Resources Board (CARB)** and the North American Maritime and Intermodal Industry have in general accepted the CARB regulatory setting implications for future marine terminal applications that are summarized below.

Relevant California regulatory regulation is found in the CARB Mobile Cargo-Handling Equipment Regulation (**Container Handling Equipment (CHE) Regulation**) for Ports and Intermodal Rail Yards, as amended in October 2012. The California CHE Regulation requires new terminal yard and truck equipment to have either a Tier 4 final off-road, or a model year 2010 or newer on-road engine.

Terminal yard tractors (hustlers) were required to be fully compliant with the CHE Regulation by December 31, 2017, and other types of yard equipment (top-picks, RTG cranes, etc.) were required to be fully compliant by December 31, 2013. In March 2017, the CARB Governing Board directed CARB staff to develop new regulations for CHE that will require up to **100% Zero Emissions (ZE) equipment by 2030**. New CHE regulations were permitted to be adopted as soon as 2022 with regulatory implementation starting as early as 2026.

A California CARB rule that requires all terminal equipment in operation to be fully ZE by 2030 is unlikely to be feasible, as this will require terminal operators to get rid of substantial quantities of equipment with some useful life remaining. The following chart depicts anticipated Container Handling Equipment (CHE) **Technology Maturity Status**, for the technical and commercial status of various **Zero Emission (ZE)** and **Near Zero Emissions (NZE)** terminal equipment types.

**Container Handling Equipment (CHE) Technology Maturity Status**

	2020	2021	2022	2023	2024	2025
Hybrid RTG cranes						
Electric RTG cranes						
Electric off-dock yard tractors						
Electric on-dock yard tractors						
Hydrogen on-dock yard tractors						
Hybrid side-picks						
Electric top-picks						
Hydrogen top-picks						
	Early production					
	Revenue-service production					
	Not for sale in US					

The above CARB report findings focused on the analysis of the near-term equipment technologies with sufficiently developed commercial availability to allow for a cost analysis, which primarily are electric yard tractors and hybrid lift equipment. In the above chart, intermediate-term technologies do not yet have substantial cost information available and were only discussed qualitatively.

### **GREEN TERMINAL Hybrid Electric Rubber Tired Gantry (RTG) Yard Cranes – Current Status:**

Hybrid Electrical RTG Cranes are commercially available and may save 40% in fuel compared to conventional diesel RTG terminal yard cranes. Advanced technologies to replace conventional diesel terminal equipment vary in their current state of development. Current options include hybrid NZE equipment, alternative fuel engines that allow NZE operation (e.g., natural gas engines using renewable natural gas), battery-electric vehicles, hydrogen fuel cell vehicles, and terminal equipment that can be connected to the electricity grid through cables or bus bars.

Hybrid Electric RTG Cranes, which use a battery with a small engine for repowering when the energy recovery is insufficient to keep the battery charged, are part of the regular offering list from multiple large terminal lift equipment vendors.

**GREEN TERMINAL Zero-Emission (ZE) STS Crane Conclusion Recommendations:**

Hybrid Electric RTG yard cranes are the most appealing option to reduce emissions in the near to intermediate term. Hybrid Electric RTG Cranes are currently available from multiple terminal equipment vendors (e.g., Mi-Jack, Kalmar, Kone). An applicable example is the Port of Oakland's SSA Terminals, which operates the Oakland International Container Terminal (OICT) and Matson Terminal and has replaced thirteen 1,000-horsepower engines with 142-horsepower engines via the hybrid-electric RTG project.

**GREEN TERMINAL ZE and NZE Terminal Equipment Recommendations:**

In consideration of the above industry findings, and considering current industry updates, procurement of the following terminal Container Handling Equipment (CHE) should be considered:

- **Hybrid Electric STS Cranes** (ZE) at the terminal Wharf/Quay,
- **Hybrid Lift RTG** (NZE) Yard Cranes, and
- **Electric On-Dock Yard Tractors** (High Powered Yard Hostlers) (NZE) when practical and economically available, near term, within the container and intermodal equipment industry.

**I. CRITICAL LIT DEVELOPMENT ISSUES OVERVIEW FINDINGS AND CONCLUSIONS**

This Critical Development Issues Overview Report addresses major paramount LIT port development issues and concerns and is not limited to the identified issues and concerns outlined and described in this report.

In summary, this Critical Development Issues Overview Report finds and has concluded that:

- Because the current project will result in substantial and potentially deleterious public health, safety, environmental and traffic impacts on the citizens of St. Bernard Parish, a cohesive and regional sustainable **statewide strategy** focused on conducting a suitable competitive container terminal site selection evaluation is critically needed. Not conducting a **comprehensive site selection analysis** would be a strategic miscalculation for the State of Louisiana, and indeed the nation, and Louisiana's marine and intermodal shipping interests now more than ever.
- A comprehensive statewide container port site selection analysis is critically necessary to ensure that a state-of-the-art intermodal container port terminal is located at a **superior, more favorable, and less publicly impactful terminal site** further downriver than the current PONO proposed site in Violet, LA.
- The State of Louisiana, and in particular St. Bernard Parish and the southeastern Louisiana maritime shipping and logistics stakeholders, must avoid the potentially detrimental harm that would otherwise adversely impact the lower Mississippi region, southeast Louisiana citizens and taxpayers, and marine and intermodal rail container shipping stakeholders of Louisiana and mid-America.

- This Critical Development Issues Overview report urgently recommends that a **Port and Intermodal Development Advisory Committee** should be formed to critically assess the market driven economic viability and justifiable needs for a mega container port development in Southern Louisiana. This Overview Summary endorses a proposed riverfront location and conceptual terminal development deliberate planning for a state-of-the-art marine container and intermodal rail terminal designed to specifically advantage the competitive capabilities of the entire southeastern Louisiana marine container shipping region, and not just a single port complex. John F. Kennedy, in a 1963 speech, stated, “*A Rising Tide Will Lift All Boats.*” Perhaps this metaphorical expression in this instance should be “*A Rising Tide **Should** Lift All Boats.*”
- The PONO neglected to conduct and/or share crucial project due diligence information and justification analysis to rigorously evaluate and justify the LIT Mega Container Terminal development proposal, including, but not limited to, a detailed market cargo (Container and Intermodal) demand analysis, which is fundamentally critical to evaluating the need for any modern competitively successful marine intermodal terminal development project.
- The truck-trip volumes generated by the container terminal could reach 1,728 per day at full terminal capacity. These tremendous daily truck-trip volumes would negatively impact southeastern Louisiana traffic congestion, regional vehicular safety, and could deleteriously impact environmental air quality.



Port of New Orleans, LIT Container Terminal, Violet, LA  
**CRITICAL DEVELOPMENT ISSUES OVERVIEW**  
January 15, 2024 – FINAL REPORT

ABOUT THE AUTHOR:



**PROFESSIONAL BIOGRAPHY**

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***Vickerman & Associates LLC***

John Vickerman is the President of ***Vickerman Associates LLC***, a firm specializing in the planning and design of port, intermodal and freight coordination facilities and systems worldwide. Much of John's work focuses on assisting ports and shipping companies to recognize and prepare for future market and technological changes.

John has worked on major port projects throughout the North America and the world for more than 40 years. ***"SIXTY-SEVEN of the NINETY" North American deep-water general cargo ports have benefited from John Vickerman's strategic port master planning and port development design programs.*** John Vickerman has managed some of the largest Port Planning projects in North America. His international practice includes work for many of the Canadian Ports, the Ports of Rotterdam and Hong Kong, Melbourne Australia, the Panama Canal Authority, the intermodal freight analysis for the Eurotunnel between England and France, the Port of Pecém, Brazil, the new Port of Castilla, Honduras and emerging new transshipment port and logistics development projects in Latin America.

Mr. Vickerman has served as a member of the USDOT Freight Roundtable Advisory Board to the US Secretary of Transportation. He completed two terms as Chairperson for the Intermodal Freight Terminal Design and Operations Committee under the purview of the Transportation Research Board (TRB)/National Research Council (NRC), National Academy of Science. He has served on many national Policy Committees for the TRB.

John is both a licensed Civil Engineer and Registered Architect in 22 states and holds a master's degree with honors in Structural Engineering from the University of California, Berkeley. He retired as a Captain in the Civil Engineer Corps of the United States Navy Reserve after 38 years of continuous service.

**LOUISIANA CENTRIC PORT STRATEGIC MASTER PLANNING EXPERTISE:**

Port NOLA – Port of New Orleans - **Port-Wide Strategic Master Plan - Phase II** (2017 – 2019)

Port NOLA - Port of New Orleans – **"Millennium Port" Strategic Planning Study**

Port NOLA - Port of New Orleans – **West Bank Port Development Strategic Planning**

**"CHANGING COURSE" International Competition Finalist** – Future of the Lower MS River Delta

Port of Plaquemines Parish - **Comprehensive Port Strategic Master Plans** (2009 – 2017)

**Louisiana International Gulf Transfer Terminal (LIGTT)** - Port Commission - General Consultant

**Houma Navigation Canal (HNC) Lock Complex (TE-113) Navigation Study** - Terrebonne Parish

**Calcasieu Ship Channel Salinity Control Measures (CS-065)** – Navigation Feasibility Study

Port of Baton Rouge – **Strategic Port Master Plan**

Port of South Louisiana – **Strategic Port Master Plan**

End of Document



# *St. Bernard Parish Council*

8201 West Judge Perez Drive Chalmette, Louisiana, 70043  
(504) 278-4228 Fax (504) 278-4209  
[www.sbpj.net](http://www.sbpj.net)

**#27**

EXTRACT OF THE OFFICIAL PROCEEDINGS OF THE COUNCIL OF THE PARISH OF ST. BERNARD, STATE OF LOUISIANA, TAKEN AT A REGULAR MEETING HELD IN THE COUNCIL CHAMBERS OF THE ST. BERNARD PARISH GOVERNMENT COMPLEX, 8201 WEST JUDGE PEREZ DRIVE, CHALMETTE, LOUISIANA ON TUESDAY, AUGUST 3, 2021 AT SEVEN O'CLOCK P.M.

On motion Mr. Everhardt, seconded by Mr. Luna, it was moved to **adopt** the following resolution:

## **RESOLUTION SBPC #2159-08-21**

A RESOLUTION TO OPPOSE THE PORT NOLA'S LOUISIANA INTERNATIONAL TERMINAL (LIT) IN ST. BERNARD PARISH.

**WHEREAS**, the health, safety, and wellbeing of St. Bernard Parish residents are of the utmost importance to this council, who serve the best interests of our community; and,

**WHEREAS**, the current proposal for the Louisiana International Terminal (LIT) will result in devastating environmental damage to our wetlands, on which our parish depends for flood protection, drainage, the protection of our wildlife, and the preservation of our region's natural beauty; and,

**WHEREAS**, port-related traffic will generate an unprecedented and insupportable burden on residential roads not rated for heavy freight and create hazardous driving conditions for our residents, as well as significant noise pollution without adequate buffer zones from rail, road, and ship traffic; and,

**WHEREAS**, the harmful emissions, chemicals, and potential hazardous materials inherent to the port maintenance and commerce will negatively impact the health of our residents, especially children, the elderly, and those with pre-existing and underlying health conditions, and may contribute to long-term diseases like cancer, respiratory illnesses, and other ailments; and,

**WHEREAS**, the proposed location of the container yard and warehouses targets a predominantly African American neighborhood in Violet, Louisiana, forces the relocation of a historic black school, and disrupts the sanctity and tranquility of a historic African American cemetery; and,

**WHEREAS**, elected state officials privy to the planning and development of this port expansion in St. Bernard Parish should address the questions, concerns, and will of their constituents regarding any project yielding such a local impact; and,

**Kerri Callais**  
*Councilmember  
at Large*

**Richard "Richie" Lewis**  
*Councilmember  
at Large*

**Gillis McCloskey**  
*Councilmember  
District A*

**Joshua "Josh" Moran**  
*Councilmember  
District B*

**Howard Luna**  
*Councilmember  
District C*

**Wanda Alcon**  
*Councilmember  
District D*

**Fred Everhardt, Jr.**  
*Councilmember  
District E*

**Roxanne Adams**  
*Clerk of Council*



# *St. Bernard Parish Council*

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**Kerri Callais**  
*Councilmember  
at Large*

**Richard "Richie" Lewis**  
*Councilmember  
at Large*

**Gillis McCloskey**  
*Councilmember  
District A*

**Joshua "Josh" Moran**  
*Councilmember  
District B*

**Howard Luna**  
*Councilmember  
District C*

**Wanda Alcon**  
*Councilmember  
District D*

**Fred Everhardt, Jr.**  
*Councilmember  
District E*

**Roxanne Adams**  
*Clerk of Council*

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Extract #27, continued  
August 3, 2021

**WHEREAS**, the parish will not adequately benefit from the long-term economic gains achieved by the Louisiana International Terminal or receive any significant tax revenue from the port site; and,

**WHEREAS**, proximity to the Louisiana International Terminal's industrial site will decrease property values in nearby residential neighborhoods; and,

**WHEREAS**, the diversion of St. Bernard Highway to bypass the port will impact a state road designated a scenic byway by the United States Department of Transportation and impede the safe travel and commute of our residents as well as those in Plaquemines Parish; and,

**WHEREAS**, the every effort towards the protection of our residents' homes and businesses from flooding should be most assured, the Port of New Orleans' Louisiana International Terminal will result in the loss of more than 350 acres of wetlands, on which residents depend to absorb rainwater; and,

**WHEREAS**, the immeasurable quality of life which attracts residents, families, businesses, and visitors to our beautiful St. Bernard Parish should be most guaranteed through every effort possible.

**NOW THEREFORE BE IT RESOLVED**, that the St. Bernard Parish Council, the Governing Authority, does hereby proclaim their opposition to the Port of New Orleans' intended expansion for the Louisiana International Terminal (LIT) in St. Bernard Parish.

The above and foregoing having been submitted to a vote, the vote thereupon resulted as follows:

**YEAS:** McCloskey, Moran, Luna, Alcon, Everhardt, Callais

**NAYS:** None

**ABSENT:** None

The Council Chair, Mr. Lewis, cast his vote as **YEA**.

And the motion was declared **adopted** on the 3<sup>rd</sup> day of August, 2021.



## *St. Bernard Parish Council*

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**Kerri Callais**  
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Extract #27 continued  
August 3, 2021

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*Councilmember  
District D*

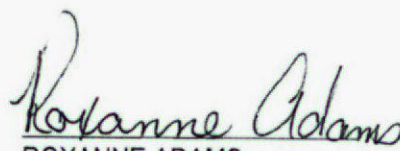
**Fred Everhardt, Jr.**  
*Councilmember  
District E*

**Roxanne Adams**  
*Clerk of Council*

### CERTIFICATE

I HEREBY CERTIFY that the above and foregoing is a true and correct copy of a motion adopted at a Regular Meeting of the Council of the Parish of St. Bernard, held at Chalmette, Louisiana, on Tuesday, August 3, 2021.

Witness my hand and the seal  
of the Parish of St. Bernard on  
this 3<sup>rd</sup> day of August, 2021.

  
ROXANNE ADAMS  
CLERK OF COUNCIL

# Importing Harm: U.S. Ports' Impacts on Health and Communities

*THE Impact Project Policy Brief Series*

January 2012

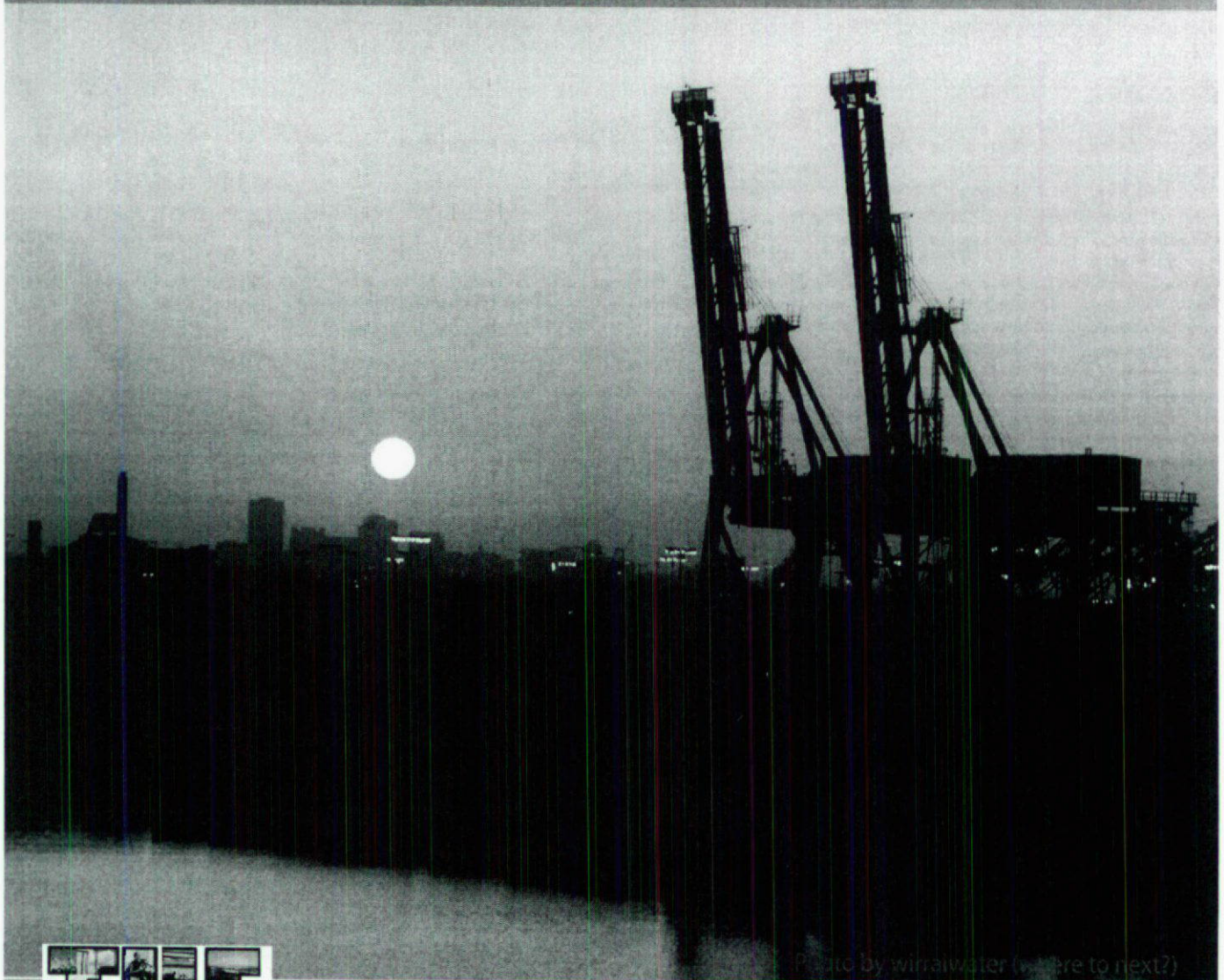


Photo by wiraiwater (where to next?)



Trade, Health and Environment Impact Project  
[www.theimpactproject.org](http://www.theimpactproject.org)

## Introduction

Ports are fascinating industrial operations. A visitor can see a colorful maze of majestic ships and cranes loading and unloading cargo. Ocean cruise ships can be seen passing by with hundreds of passengers waving at their families, friends, and the public. Thousands of trucks and long lines of train cars are all moving cargo in and out of the ports. Huge ships the size of three football fields arrive from Asia and other far-away places, bearing thousands of 20 to 40 foot containers, each filled with children's toys, consumer electronics, furniture or other goods – all made in other countries and all ready to be delivered to America's retailers. Other ships carry millions of gallons of crude oil, liquefied natural gas, imported cars, and agricultural products.

But Ports are much less exciting to live near than to casually observe. For communities in close proximity to ports, there is a daily non-stop parade of polluting ships, trucks, and trains operating and passing near their neighborhoods. People living near the San Pedro Bay Ports of Los Angeles and Long Beach, and along freight transportation corridors serving the ports, have witnessed a major expansion in trade and goods movement over the past 40 years. Port drayage trucks haul about 80% of the 50 million containers that move through American ports annually.<sup>1</sup> U.S. West Coast ports have seen a nearly 29 times increase in international trade since 1970.<sup>2</sup> The Ports of Los Angeles and Long Beach container volume is projected to increase from 11.2 million in 2009 to 36 million annually by 2020.<sup>3</sup>

Growth at the ports has been celebrated by many as an economic engine for the region. The Ports of Los Angeles and Long Beach directly employ approximately 1,498 workers and are said to support 1.4 million jobs throughout California.<sup>4</sup> However, this growth has also resulted in significant negative environmental, public health, and economic impacts. The ports have become the leading source of air pollution in greater Los Angeles and throughout the region, to the extent that communities located near the ports are sometimes referred to as "Diesel Death Zones."<sup>5</sup>

In the last decade environmental justice organizations have formed near the ports, goods movement freight transportation corridors, and gigantic distribution warehouses, to draw attention to the toll that port-related pollution is taking on residents and their communities. These groups have organized local communities to measure pollution, to demand that the ports not expand unless they can protect public health in the process, and to take legal action to demand stronger environmental standards and fuller environmental and health assessments of Port projects.

This pressure has led the San Pedro Bay Ports to acknowledge that there are health and environmental impacts from their operations and to take some steps to reduce toxic emissions. But with predictions of continued massive expansion in goods movement through the ports, much more needs to be done to prioritize health and environmental protection over trade expansion.

## Ports of Los Angeles and Long Beach

The Ports of Los Angeles and Long Beach are huge transportation and logistics complexes. They are designed to unload and load large, ocean-going cargo ships. Much of modern commerce relies upon standardized shipping containers which are moved by the thousands in ships across oceans, unloaded by enormous cranes, and placed onto trucks and trains as the first stage of their movement to final destinations. The Ports of Los Angeles and Long Beach specialize in container trade with Asia. The Port of Los Angeles is the # 1 busiest container port in the United States. Long Beach is the second busiest. Together, the two adjacent sites are the 6<sup>th</sup> busiest container port complex in the world.<sup>6</sup>

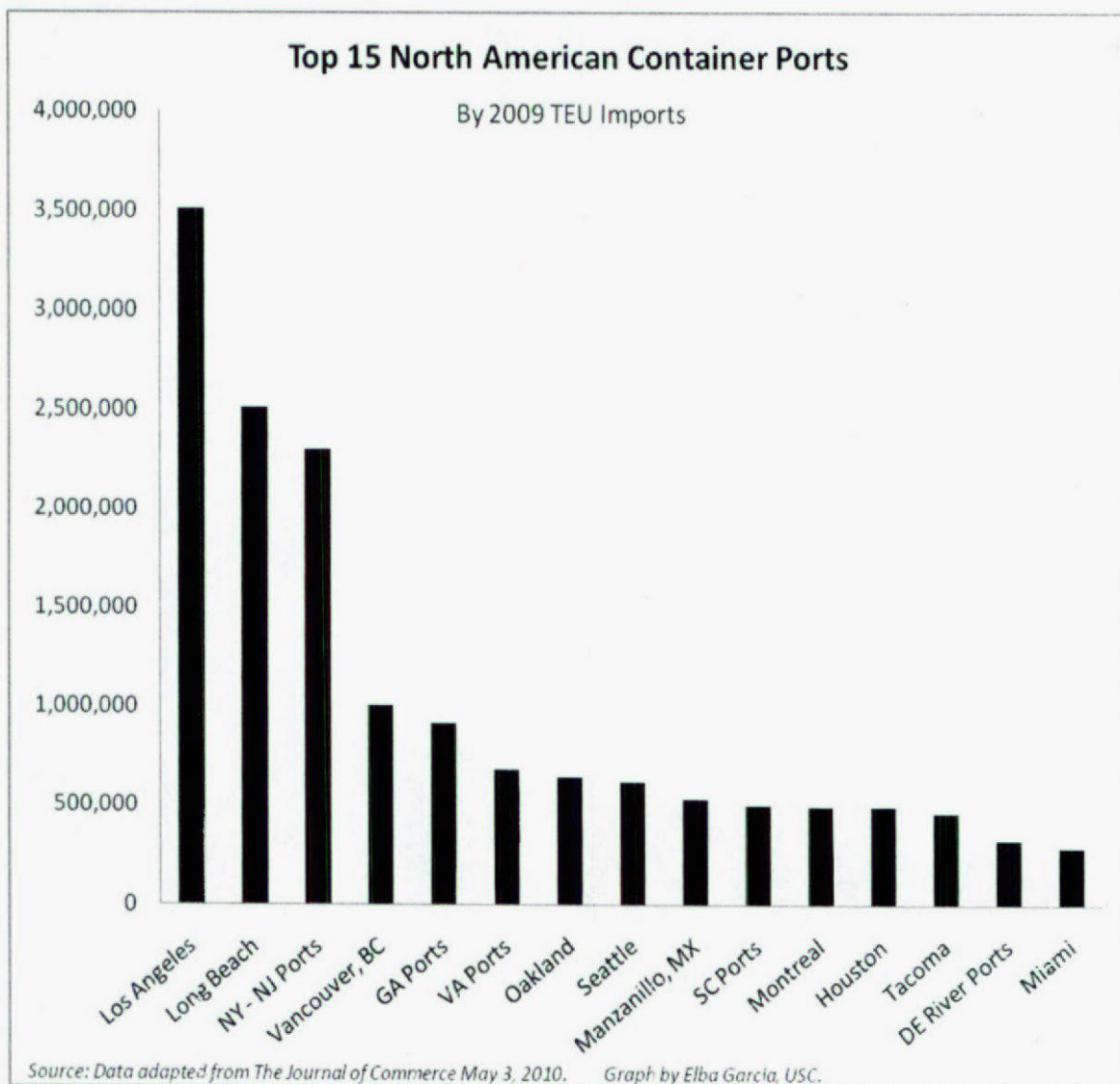
Statistics for the Ports of Los Angeles and Long Beach<sup>7,8</sup>

Port statistics	Los Angeles	Long Beach
<i>National rank (containers handled)</i>	1	2
<i>Share of containers moving through U.S. handled</i>	20%	15%
<i>Containers handles in 2009</i>	6.7 million TEUs <sup>9</sup>	5.1 million TEUs
<i>Size</i>	4300 acres 270 berths	3200 acres 80 berths
<i>Top five imports</i>	Furniture, Women's and Infant Apparel, Footwear, Toys, Automobile Parts	Crude oil, Electronics, Plastics, Furniture, Clothing
<i>Top five exports</i>	Paper, Paperboard and Wastepaper, Scrap Metal, Grains and Flour, Products, Fabrics and Raw Cotton, Pet and Animal Feed	Petroleum Coke, Refined petroleum, Chemicals, Waste paper, Foods
<i>Top trading partners</i>	East Asia = 92%; top five countries are China, Japan, South Korea, Taiwan, and Thailand	East Asia = more than 90%; top five countries are China, Japan, South Korea, Taiwan, and Mexico

### Top 5 Retail Importers in 2009 in the United States via Ocean Containers

Retailer	TEUs 2009	Comment
Wal-Mart	684,000	World's largest retailer, 8416 stores; \$305 billion in U.S. net sales
Target	441,800	1,740 stores in 49 states; 33 distribution centers
Home Depot	278,900	2,200 stores around world
Sears Holding	216,300	Sears & Kmart; 4000 stores in the U.S. and Canada; 39 distribution centers
Lowe's	195,000	1,700 stores in the U.S. and Canada

Source: Adapted from *The Journal of Commerce* May 31, 2010. Table by Elba Garcia, USC.



## Community Impacts

### Public Health

Ports have significant health, environmental, and quality of life impacts on communities located close to the port facilities. Pollution from ships burning dirty bunker fuel and trucks, trains and port equipment burning diesel significantly impacts local residents and hurts air quality throughout the region.

Because so many ships and vehicles operate there, the Ports of Los Angeles and Long Beach are the largest single source of air pollution in Southern California. In 2009, the Ports accounted for 10% of particulate emissions, 7% of nitrogen oxides emissions, and 42% of sulfur dioxide emissions in the South Coast Air Basin.<sup>10 11</sup> These pollutants contribute to asthma, reduced lung development in children, cardiovascular disease, lung cancer, and premature death.



Port Operations Include Activities On and Off Port Properties

The California Air Resources Board estimates that there are 3,700 premature deaths per year directly attributed to the ports and goods movement activities statewide and approximately 120 deaths per year associated with diesel particulate matter emissions from activities at the Port of Los Angeles and Long Beach.<sup>12</sup> The economic cost associated with these deaths as well as for medical care for illnesses and missed school and work days is an estimated \$30 billion annually.<sup>13</sup>

Containers from overseas are also potential vectors for the introduction of invasive species or new strains of diseases. Container storage yards are havens for insects and rodents, which could potentially spread illness in surrounding neighborhoods. Fumigation of certain types of agricultural commodities carries its own risks of toxic exposure. From 1997-2008 California Cotton Company in Wilmington fumigated shipping containers with the fungicide methyl bromide outdoors less than 50 feet from where people lived and children played.<sup>14</sup>

2005 PM and Ozone Health Effects Associated with Ports and Goods Movement in California<sup>15</sup>

Health Outcome	Cases per Year	Uncertainty Range (Cases per Year)	Valuation (millions)	Uncertainty Range (millions)
Premature Death	2,400	720 to 4,100	\$19,000	\$5,900 to \$36,000
Hospital Admissions (respiratory causes)	2,000	1,200 to 2,800	\$67	\$40 to \$94
Hospital Admissions (cardiovascular causes)	830	530 to 1,300	\$34	\$22 to \$53
Hospital Admissions (cardiovascular causes)	62,000	24,000 to 99,000	\$1.1	\$0.44 to \$1.8
Acute Bronchitis	5,100	-1,200 to 11,000	\$2.2	-\$0.52 to \$4.7
Work Loss Days	360,000	310,000 to 420,000	\$65	\$55 to \$75
Minor Restricted Activity Days	3,900,000	2,200,000 to 5,800,000	\$230	\$130 to \$350
School Absence Days	1,100,000	460,000 to 1,800,000	\$100	\$41 to \$160



This is not the future we want for our children and elders.

### ***Noise and Light Pollution***

As large industrial facilities, the ports, truck freight transportation corridors, train routes, and rail yards are major sources of non-stop noise. In southern California, the ports, intermodal facilities and rail yards now operate 24 hours per day, which means that residential communities never have a quiet day, night or weekend. The human body does not get used to loud or continuous noise; the body's biological systems continue to react but at lower thresholds.<sup>16</sup> Night-time operations at the port and rail yard facilities also emit light pollution. Many port and goods movement facilities use large banks of lights that shine on adjacent residential properties, passing through windows and curtains.<sup>1718</sup>

### ***Public Safety***

Port terminals, freight transportation corridors, intermodal facilities, transloading facilities, container inspection facilities, container storage yards, warehouses, distributions centers, marine fuel, oil and gas storage terminals and toxic and hazardous cargo pose significant public safety hazard risks from on-port property and off-port property accidents. If there is a major incident, public service providers such as police, fire department, paramedics, and utilities will be diverted to the ports. The risks of these negative impacts are not included in traditional cost-benefit economic assessments of the goods movement industry. Some examples of increased public hazard risk factors include:

- › Ship breakdowns, loss of power, collisions
- › Train wrecks, derailments, toxic chemical spills
- › Truck accidents, breakdowns, spills, fires
- › Petroleum fuel storage tank, oil, and gas pipeline fires, explosions, or spills
- › Terrorist attacks
- › Increased damage from natural disasters

## ***Land Use***

The ports have also purchased hundreds of acres of land adjacent to their facilities, causing direct and indirect displacement of residents, community resources, and businesses. These land holdings deprive residents in environmental justice communities of access to beaches, coastal tidelands, wetlands, and aesthetic bay vistas while also locking away land that could be used for future green space parks, sport facilities, new public schools, public libraries, community centers, residential areas, and retail and commercial centers. City planning and zoning has failed to require adequate public health and safety buffers to protect residents, children in schools, and senior care facilities from bordering ports, supporting industries and transportation corridors.

## ***Aesthetics and Blight***

Many harbor residents purchased their homes because of the beauty of the coastline, harbor bay, and as an investment. However, many of these homeowners now no longer enjoy a beautiful vista of the sea. What they see are hundreds of ship smoke stacks billowing smoke, tens of thousands of stacked containers, new land masses being built in the ocean to create new port terminals, and blight throughout the area. Aesthetic impacts and impacts on property values are negative economic impacts that are not included in standard cost-benefit economic assessments.

## ***Policy Recommendations***

Community involvement and advocacy in the Harbor communities near the Ports of Los Angeles and Long Beach have led to increased awareness of the negative pollution, health impacts, and socio-economic impacts from ports and goods movement. This has led to the establishment of new policies, standards, and programs. The Ports of Los Angeles and Long Beach have adopted the San Pedro Bay Ports Clean Air Action Plan, Clean Truck Program, Clean Port Air Standards, Water Resources Action Plan, Wilmington and San Pedro Waterfront Development Projects, Clean Ship Fuel Incentive Program and Ship Speed Reduction Program.

While these programs and pollution reductions are a promising start, they still leave emissions at significant levels that endanger public health. And with shipping trends expected to pick up again, there is a need for stronger, binding actions and regulations addressing the range of health and community impacts. Policy makers should regulate ports and goods movement to ensure that all sources of pollution are being reduced to safe levels. All negative impacts must be mitigated, and the public must be involved in overseeing the ports. The Impact Project is committed to zero emissions technologies and regulations across all stages of goods movement. Policy recommendations to reduce rather than eliminate emissions should be considered important interim steps towards achieving zero emissions.

THE Impact Project has identified the following policy recommendations to further advance environmental justice and improve the health of residents living near port operations anywhere in the country.

1. Port management must include the public and reflect accurate health, environmental and socio-economic impact information:

- › Port Boards of Commissioners and Port Joint Power Authorities membership should include representatives from: residential communities, public health and environmental advocates, and/or green technology experts labor to ensure that impacted persons and environmental experts have a formal role in port management.
- › Ports should establish a Community Advisory Committee to allow for broader public input, following the example of the Port of Los Angeles.<sup>19</sup>
- › Planned expansions or major new projects environmental assessments at ports should include Environmental Impact Reports and/or Environmental Impact Statements (EIR/EIS), Health Risk Assessments (HRA), and Health Impact Assessments (HIA).
- › Ports should mitigate all “significant impacts” identified by EIR/EISs and HIAs to less than significant before proceeding with a project and should not rely upon ‘Overriding Considerations’ to approve a project.

2. Ports should establish comprehensive clean air action and environmental sustainability programs, including:

- › Adopt Clean Air Action Plans<sup>20</sup> that include Clean Port Air Standards, Clean Ship Fuel Incentive Programs and Ship Speed Reduction Programs,<sup>21</sup> and Clean Truck Programs with requirement that port truck drivers must be employees of truck companies.<sup>22</sup>
- › Require ships to plug in and use electric power when at dock rather than running engines.<sup>23</sup>
- › Reduce the number of cargo ‘moves’ and trans-shipment (and resulting pollution) by increasing on-dock rail.<sup>24</sup>
- › In designing and implementing clean air plans, address pollution along the entire logistics chain, from ships’ arrival at port, to docking and offloading, to shipment and transshipment inland.
- › Adopt container fees and bulk commodity fees to help pay for environmental and community programs.<sup>25</sup>
- › Adopt a Technology Advancement Program to support new emerging alternative and green technologies.<sup>26</sup>
- › Adopt zero pollution technologies when these are fully developed.<sup>27</sup>
- › Adopt Green House Gas Reduction Plans.<sup>28</sup>
- › Adopt Water Resources Action Plans<sup>29</sup> and Wetlands and Aquatic Life Restoration Plans<sup>30</sup> (and not expand into environmentally sensitive coastal areas).
- › Conduct real-time air quality monitoring on site and in adjacent communities.<sup>31</sup>

### 3. Ports must reduce their negative health and community impacts:

- › Create buffer zones between port and goods movement operations and adjacent communities. The California Air Resources Board recommends buffer zones between rail facilities and sensitive receptors (homes, schools), and taking steps to avoid locating new residences and sensitive receptors downwind of ports.<sup>32</sup> Community organizations active in THE Impact Project have often called for 1500 foot buffer zones. In addition, these rules should apply in both directions: no location of new industrial facilities near sensitive receptors, as well as no new sensitive receptors near industrial facilities.
- › Establish a Public Health Care Fund sufficient to mitigate current and future impacts.
- › While reducing emissions from port operations and transportation should be the priority, provide air filters to all impacted sensitive receptors such as schools, child care centers, and residences.<sup>33</sup>
- › Limit noise and light pollution. Require sound barriers and lower lights and light deflectors to limit noise and light pollution to nearby residential areas. Provide better insulation to nearby sensitive receptors.<sup>34</sup>
- › Ensure that existing health and environmental impacts are satisfactorily addressed before expanding port property operations.
- › For all port tenant off-port property businesses, increase enforcement so that facilities comply with applicable city, county, state, and federal laws, rules, regulations, requirements and guidelines.

## Conclusion

While products shipped in and out of the ports reach destinations across the country and throughout the world, the health and environmental impacts of trade through the ports are concentrated in the primarily low-income communities near ports and along freight transportation routes inland. With predictions of continued massive expansions in goods movement through the ports, much more needs to be done to prioritize human health, environmental protection over trade expansion and assure that all appropriate health and socio-economic assessments are conducted.

## Acknowledgements

Written by Jesse N. Marquez, Coalition For A Safe Environment and Mark Vallianatos, Urban & Environmental Policy Institute (UEPI) at Occidental College, with contributions from other Impact Project partners. Photo credits: Flickr user wirralwater and Coalition For A Safe Environment. This brief is part of a series of policy papers on goods movement produced by THE Impact Project, <http://www.theimpactproject.org>. Funded by The Kresge Foundation and The California Endowment.

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- 23 The Port of Los Angeles. Alternative marine power program. [http://www.portofla.org/environment/alt\\_maritime\\_power.asp](http://www.portofla.org/environment/alt_maritime_power.asp)
- 24 In planning expansion of its TraPac terminal, The Port of Los Angeles estimated that the addition of on dock rail would eliminate 200,000 truck trips per year at one terminal. [http://www.portofla.org/maritime/good\\_movements.asp](http://www.portofla.org/maritime/good_movements.asp)
- 25 The Ports of Long Beach and Los Angeles have a \$35.00 per 20 foot TEU container tariff to finance project their clean truck programs. [http://www.portoflosangeles.org/newsroom/2007\\_releases/news\\_122007truckfee.pdf](http://www.portoflosangeles.org/newsroom/2007_releases/news_122007truckfee.pdf) In 2008, the Port of Los Angeles imposed a \$3.50 per TEU and 15 cent per bulk ton fee to create a community mitigation trust fund to address impacts from port expansion. [http://www.portoflosangeles.org/Board/2008/April/040308\\_Special\\_Meeting\\_Transmittals.pdf](http://www.portoflosangeles.org/Board/2008/April/040308_Special_Meeting_Transmittals.pdf)
- 26 The Ports of Los Angeles and Long Beach operate a technology advancement program to fund research into less polluting cargo handling equipment, harbor craft, heavy-duty vehicles, ocean going vessels, and locomotives. <http://www.portoflosangeles.org/environment/grants.asp>
- 27 The Port of Long Beach is evaluating the potential of zero emission container mover systems. <http://www.polb.com/environment/transplan/zecms/default.asp>
- 28 In 2006, the Port of Los Angeles inventoried greenhouse gas emissions from vehicles and equipment it owned and from purchased electricity. It did not measure emissions from ships, trucks, and trains that visited the port. In 2007, the Port released a climate action plan. [http://www.portoflosangeles.org/DOC/REPORT\\_Climate\\_Action\\_Plan.pdf](http://www.portoflosangeles.org/DOC/REPORT_Climate_Action_Plan.pdf). Other world ports have established climate action plans. The port of Rotterdam in the Netherlands is part of the Rotterdam Climate Initiative with a goal of reducing greenhouse emissions by 50% below 1990 levels by 2025. <http://jaarverslag2009.portofrotterdam.com/en/report-of-the-port-authority/environment-and-sustainability/rotterdam-climate-initiative/548>
- 29 The Ports of Los Angeles and Long Beach have a Water Resources Management Plan to address sources of water and sediment pollution. <http://www.portofla.org/environment/wrap.asp>
- 30 The Port of Los Angeles has invested in habitat restoration programs in the harbor and in adjacent coastal areas. [http://www.portofla.org/environment/wildlife\\_habitat.asp](http://www.portofla.org/environment/wildlife_habitat.asp)
- 31 The Port of Los Angeles operate four air monitoring stations to constantly monitor "ozone, sulfur dioxide, nitrogen dioxide, carbon monoxide, two sizes of particulate matter (PM10 or coarse particles, and PM2.5 or fine particles), polycyclic aromatic hydrocarbons (PAHs), and ultrafine particles." [http://portoflosangeles.org/environment/air\\_quality.asp](http://portoflosangeles.org/environment/air_quality.asp)
- 32 California air Resources Board. (2005). Air Quality and Land Use Handbook: a Community Health Perspective. <http://www.arb.ca.gov/ch/handbook.pdf>
- 33 Successful demonstration projects have been completed with air filters and schools by the South Coast Air Quality Management District. See <http://www.aqmd.gov/news1/2011/bs010711.htm> Further research on the effectiveness of filter systems is needed.
- 34 A 2004 Community Benefits Agreement negotiated by Los Angeles International airport expanded funds for a noise mitigation program to pay for insulation in neighbors' homes. [http://www.ourlax.org/commBenefits/pdf/ExhB\\_CBA\\_NoiseEasement.pdf](http://www.ourlax.org/commBenefits/pdf/ExhB_CBA_NoiseEasement.pdf)

## STANDING STRUCTURES SURVEY



Site Number 1.5008  
 I. PARISH St. Bernard  
 MUNICIPALITY \_\_\_\_\_  
 USGS QUAD Chalmette  
 Township 13S Range 13E Section 4  
 TYPE OF PROPERTY Residential  
 NAME (common) Joseph Meraux  
 NAME (historic) Benjamin Saxon Story  
 ADDRESS 5008 St. Bernard Highway  
Docville  
 DATE OF CONSTRUCTION mid 19th century  
 II. 1. Condition Deteriorated  
 2. Style Creole Cottage Greek Revival  
 3. Floor Plan 1 story cottage detail  
 4. Building Material Clapboard with a tin roof

## III. Physical description of property and historic significance

This house has a gabled roof. There is one center chimney. There are front and back porches. The front porch has four square columns and a wooden floor. The porch and house are on brick piers. There are two front entrances, each a French door. Each entrance has a three light transom. The two front windows are six over six. A barn and a shed are located on the property.

Rating: Blue - fine single Greek Revival Creole Cottage Plantation structure.

IV Recorded by Planning Commission  
 Date June, 1982  
 For St. Bernard Parish

V. Sources consulted Dr. Cizek

Site Number 1.5010

I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD Chalmette

Township 13S Range 13E Section 4

TYPE OF PROPERTY Residential

NAME (common) Joseph Meraux  
(Docville)

NAME (historic) Benjamin Saxon Story

ADDRESS 5010 East St. Bernard Hwy.

\_\_\_\_\_

DATE OF CONSTRUCTION Circa 1920

II. 1. Condition Good

2. Style Country Bungalow

3. Floor Plan 1 story double shotgun

4. Building Material Clapboard over  
vertical board with a tin roof.



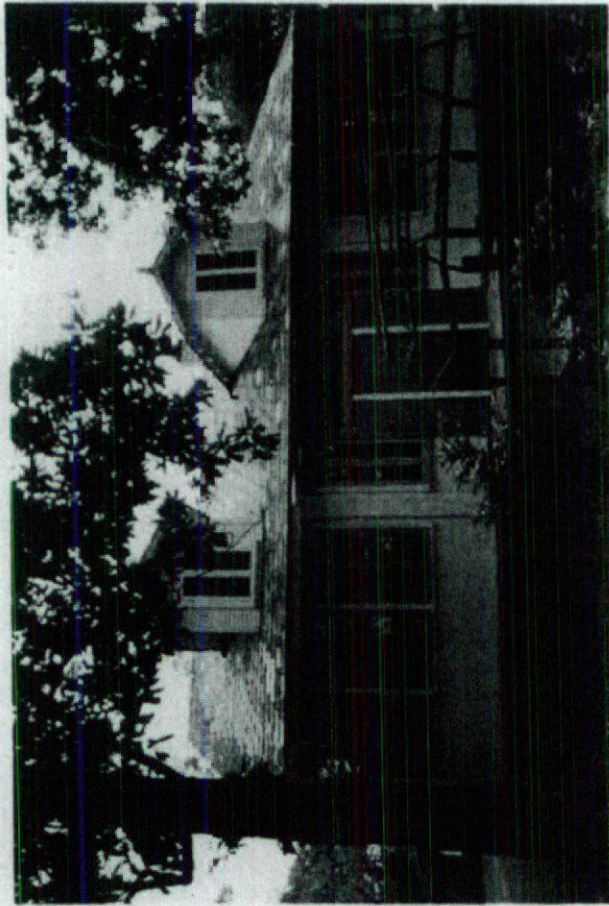
This house has a gabled roof. There is one center chimney of exposed brick. The front porch has four square columns and a wooden floor. There are two wooden front doors. The gable window has two lights.

IV. Recorded by Planning Commission  
Date June, 1982  
For St. Bernard Parish

V. Sources consulted Dr. Cizek

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## STANDING STRUCTURES SURVEY



Site Number 1.5124

I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD Chalmette

Township 13S Range 13E Section 4

TYPE OF PROPERTY Residential

NAME (common) Joseph Meraux

NAME (historic) Benjamin Saxon Story

ADDRESS 5124 East St. Bernard Hwy.,  
Main house - Docville

DATE OF CONSTRUCTION \_\_\_\_\_

II. 1. Condition Good

2. Style \_\_\_\_\_

3. Floor Plan 1½ story central hall

4. Building Material Clapbaord and a  
slate roof.

## III. Physical description of property and historic significance

This house is being renovated. It has a gable roof with an overhang. There are three interior chimneys of exposed brick and steel. The front porch has been recently remodeled and enclosed. Four original square columns have been included in the porch enclosure, but are still visible. The porch floor is wooden. The main door is carved and the second door is plain. Sidelights have been replaced with wood panels. There are two front dormer windows, each with a roof ornament. Numerous outbuildings are found on the property, some of which are described on separate forms. The main house, described above has a cast iron gate with barbed wire fence. An arbor leads from the gate to the front door of the house.

Rating: Green or Blue if restored

IV. Recorded by Planning Commission

Date June, 1982

For St. Bernard Parish

V. Sources consulted Dr. Cizek

## STANDING STRUCTURES SURVEY

Site Number 1.5204

I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD Chalmette

Township 13S Range 13E Section 4

TYPE OF PROPERTY Residential

NAME (common) Joseph Meraux

NAME (historic) \_\_\_\_\_

ADDRESS 5204 East St. Bernard Hwy.  
Docville

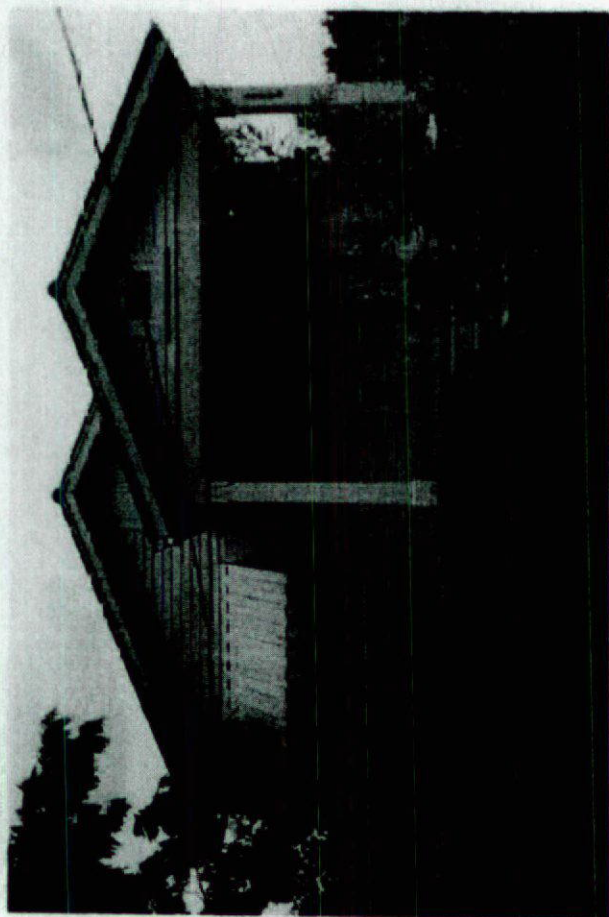
DATE OF CONSTRUCTION circa 1920

II. 1. Condition Excellent

2. Style Bungalow

3. Floor Plan 1 story

4. Building Material Clapboard with  
a slate roof.



## III. Physical description of property and historic significance

This house has a gabled roof. The house is on piers. The front porch has two square columns with decorated trim at the top and a cement floor. There is a single twelve light front door. Each side-light has eight lights. The two front windows, partially obscured by an awning, have six over six lights each. The porch gable has eight small triangular lights around a larger diamond shaped light. The main gable has a boarded window. A carport and a shed are found on the property.

Rating: Green - well executed details.

IV. Recorded by Planning Commission

Date June, 1982

For St. Bernard Parish

V. Sources consulted Dr. Cizek

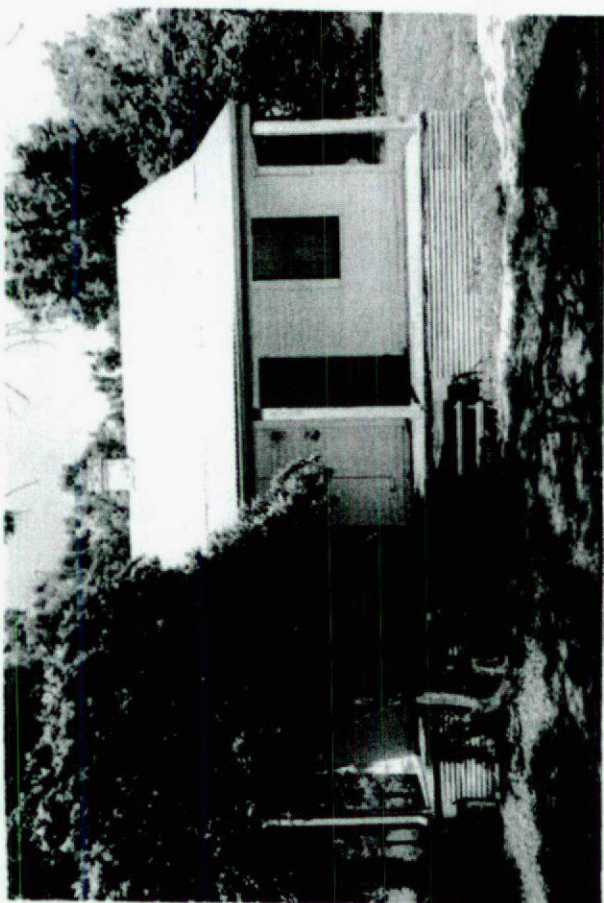
## STANDING STRUCTURES SURVEY

Site Number 1.5319I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joseph MerauxNAME (historic) Sinclair Oil Co.ADDRESS 5319 St. Bernard Hwy.DATE OF CONSTRUCTION circa 1920II. 1. Condition Good2. Style 1 story Country Vernacular  
cottage

3. Floor Plan \_\_\_\_\_

4. Building Material Clapboard with a  
tin roof.

## III. Physical description of property and historic significance

This house has a double pitched roof. There is a center chimney of exposed brick. The house and porch are on brick piers. There are four square columns. The porch floor is wooden. Tin has been placed around the base of the porch line. There are two wooden front doors. The two front windows have twelve lights each.

Rating: Green - see descriptionIV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. CizekWilliam Hyland

## STANDING STRUCTURES SURVEY

Site Number 1.5322I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

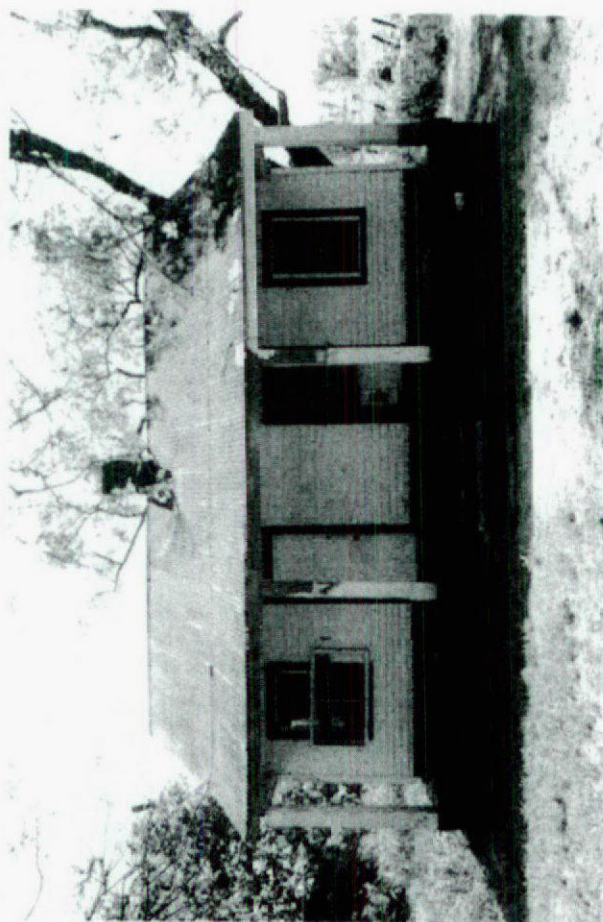
USGS QUAD ChalmetteTownship 13E Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joseph Meraux

NAME (historic) \_\_\_\_\_

ADDRESS 5322 St. Bernard Hwy.

DATE OF CONSTRUCTION \_\_\_\_\_

- II. 1. Condition Fair
2. Style Country Vernacular or altered slave quarters.
3. Floor Plan 1 story cottage
4. Building Material Clapboard with a tin roof.



## III. Physical description of property and historic significance

This cottage has a double pitched roof. There is one center chimney of exposed brick. The porch and house are on brick piers. There are three square columns and a wooden porch floor. There are two single front doors of wood and two front windows. Each window has seven lights. The house is vacant.

Rating: Green - may be altered slave quarter building from Saxon Home Plantation.

IV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

## STANDING STRUCTURES SURVEY

Site Number 1.5323EI. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joe MereauxNAME (historic) Sinclair Oil CompanyADDRESS 5323 St. Bernard Hwy.DATE OF CONSTRUCTION circa 1920II. 1. Condition Good2. Style Country Vernacular3. Floor Plan 1 story cottage4. Building Material Clapboard with a tin roof.

## III. Physical description of property and historic significance

This house has a double pitched roof. There is a center chimney of exposed brick. The house and porch are on brick piers. There are four square columns and the porch floor is wooden. There are two single front doors, each having six lights. Each of the two front windows has two lights.

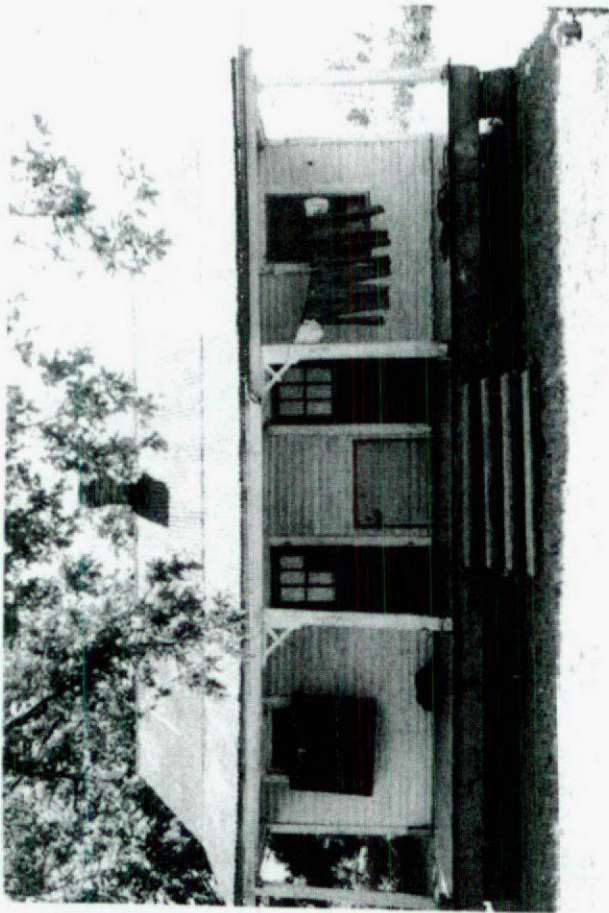
Rating: GreenIV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

44-00457

## STANDING STRUCTURES SURVEY

Site Number 1.5324EI. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joe MerauxNAME (historic) Sinclair Oil CompanyADDRESS 5324 St. Bernard Hwy.DATE OF CONSTRUCTION circa 1920II. 1. Condition Fair2. Style Country Vernacular3. Floor Plan 1 story cottage4. Building Material Clapboard with  
a tin roof.

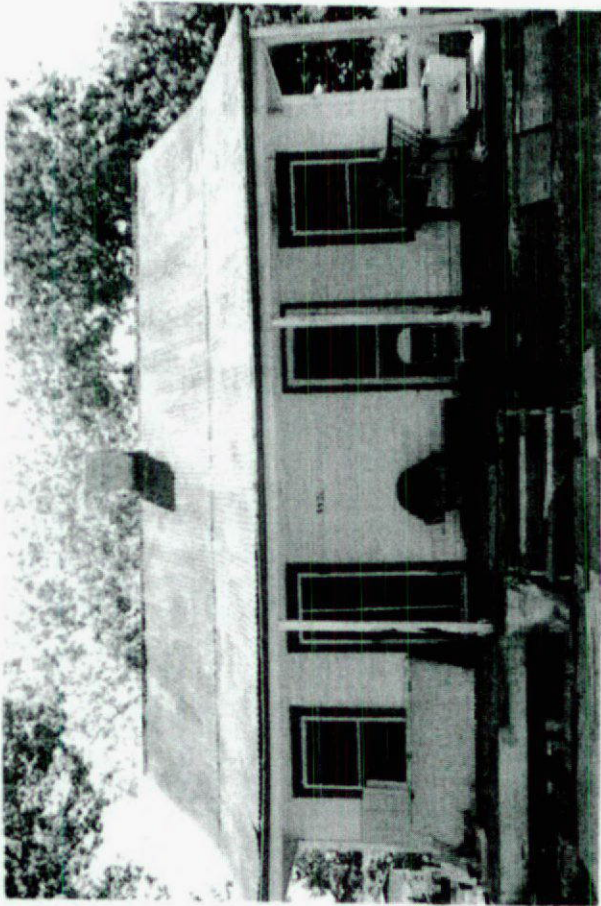
## III. Physical description of property and historic significance

This house has a double pitched roof and a solitary center chimney of exposed brick. The house and porch are on brick piers. There are four square columns across the front porch. The porch floor and steps are wooden. There are two front doors, each with six lights. The two front windows have twelve lights each.

Rating: GreenIV. Recorded by Planning Commissior.Date June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

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## STANDING STRUCTURES SURVEY

Site Number 1.5326I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joseph MerauxNAME (historic) Sinclair Oil Co.ADDRESS 5326 St. Bernard Hwy.DATE OF CONSTRUCTION circa 1920II. 1. Condition Fair2. Style Country Vernacular3. Floor Plan 1 story cottage4. Building Material Clapboard with a  
tin roof.

## III. Physical description of property and historic significance

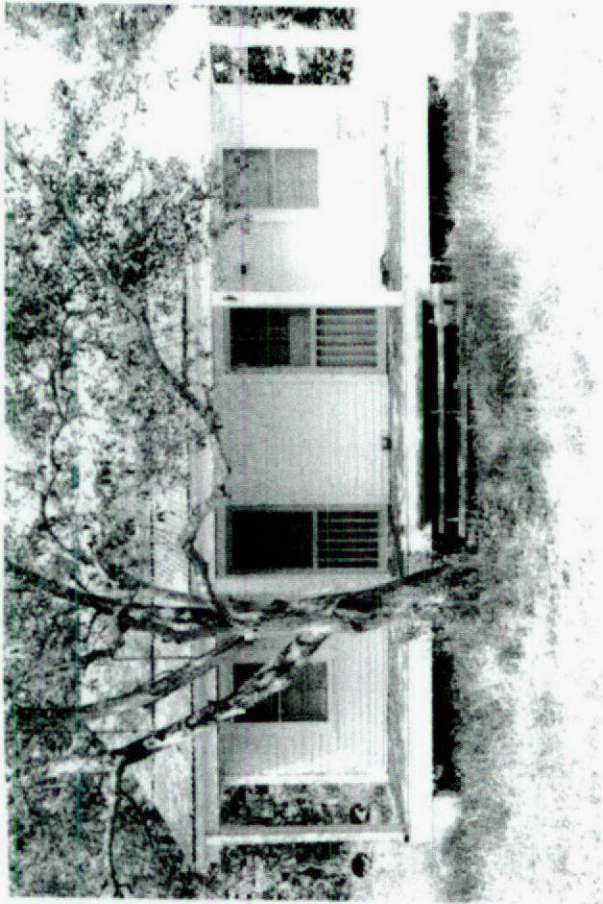
This cottage has a double pitched roof and a center chimney of brick and plaster. The porch and house are on brick piers. There are four square columns and a wooden front porch. Each of the front doors has two lights. Each window has twelve lights. The house used to serve as quarters for employees of Sinclair Oil Company.

Rating: Green - as a grouping very important statement of early industrial housing

IV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

44-00459

## STANDING STRUCTURES SURVEY

Site Number 1.5327I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joseph MerauxNAME (historic) Sinclair Oil Co.ADDRESS 5327 St. Bernard Hwy.DATE OF CONSTRUCTION circa 1920II. 1. Condition Good2. Style Country Vernacular3. Floor Plan 1 story cottage4. Building Material Clapboard with  
a tin roof.

## III. Physical description of property and historic significance

This is a cottage with a double pitched roof. There is one center chimney of exposed brick. The porch and house are on brick piers. There are four square columns and a wooden porch floor. Each of the two single front doors has four lights. The two front windows have eight lights each. Around 1920 this house served as workmen's quarters for men employed by Sinclair Oil Company.

Rating: GreenIV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

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## STANDING STRUCTURES SURVEY



Site Number 1.1  
 I. PARISH St. Bernard  
 MUNICIPALITY \_\_\_\_\_  
 USGS QUAD Chalmette  
 Township 13S Range 13E Section 4  
 TYPE OF PROPERTY Residential  
 NAME (common) Joseph Meraux  
 NAME (historic) Benjamin Saxon Story  
 ADDRESS Docville-St. Bernard Highway  
 DATE OF CONSTRUCTION circa 1915  
 II. 1. Condition Deteriorated  
 2. Style Bungalow  
 3. Floor Plan 1<sup>st</sup> story double shotgun  
 4. Building Material Clapboard over  
vertical board with a tin roof

## III. Physical description of property and historic significance

This house has a gabled roof with one interior chimney of exposed brick. The front porch has four square columns and a railing. The porch is on brick piers and the floor is wooden. The two front doors are wood and glass. Each of the two front windows has twelve lights. The gable window has two lights.

Rating: Gold

IV. Recorded by Planning Commission  
 Date June, 1982  
 For St. Bernard Parish

V. Sources consulted Dr. Cizek

## STANDING STRUCTURES SURVEY

Site Number 1.JI. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 4TYPE OF PROPERTY ResidentialNAME (common) Joseph Meraux

NAME (historic) \_\_\_\_\_

ADDRESS DocvilleDATE OF CONSTRUCTION circa 1890-1900

- II. 1. Condition Deteriorated
2. Style Galleried Cottage-Vernacular
3. Floor Plan 1 story cottage
4. Building Material Clapboard with a  
tin roof

## III. Physical description of property and historic significance

This cottage is possibly a former slave cabin. It is now vacant. The cottage has a gabled roof with a porch overhang. There is one center chimney of exposed brick. The house is on piers. The front porch, which is partially enclosed, has four square posts and a wooden floor. There are two single wooden front doors and two shuttered windows.

Rating: Red-green or blue if restoredIV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

44-00474

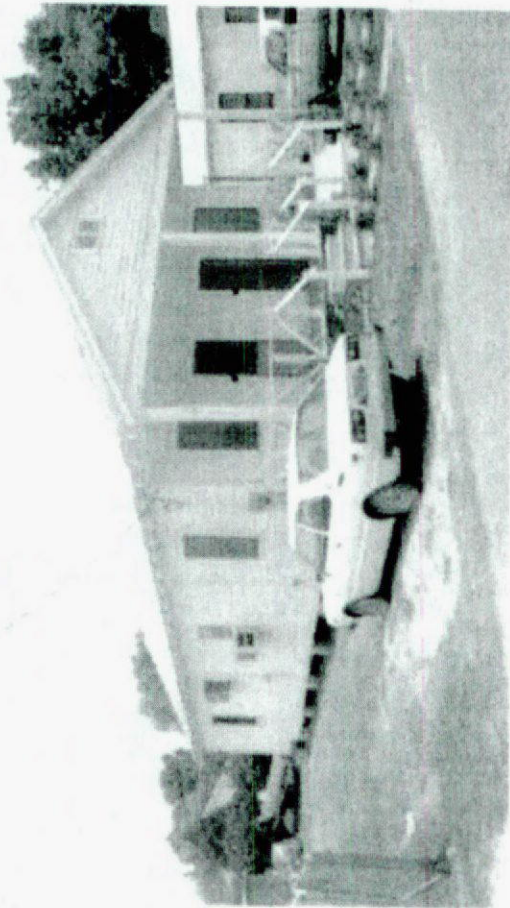
## STANDING STRUCTURES SURVEY

Site Number 2.190I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 5TYPE OF PROPERTY ResidentialNAME (common) John Watson

NAME (historic) \_\_\_\_\_

ADDRESS Rt. 2 Box 190-191 Highland Rd.DATE OF CONSTRUCTION 1930-40II. 1. Condition Good2. Style Late Bungalow "Modern"3. Floor Plan 1½ story double shotgun4. Building Material Clapboard with a  
tin roof.

## III. Physical description of property and historic significance

This house has a gabled roof with an overhang. The front porch is on piers and has three square columns. There are two front doors, each has 4 lights. The two front windows have six over six lights. The louvered gable vent appears to be new.

Rating: none

IV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

44-00475

## STANDING STRUCTURES SURVEY

Site Number 2.FI. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 5TYPE OF PROPERTY Residential

NAME (common) \_\_\_\_\_

NAME (historic) \_\_\_\_\_

ADDRESS across from Rt. 2 Box  
190,191 HighlandDATE OF CONSTRUCTION circa 1930-40II. 1. Condition Good2. Style Bungalow3. Floor Plan 1 story double shotgun4. Building Material Clapboard with  
a tin roof.

## III. Physical description of property and historic significance

This four bay shotgun has a gabled roof with a louvered vent in the gable. Three truncated columns on stucco piers support the porch roof and the floor and steps are cement. There are two single doors and the two front windows are six over six.

Rating: gold

IV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

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44-00494

## STANDING STRUCTURES SURVEY

Site Number 7.P

I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD Chalmette

Township 13S Range 13E Section 7

TYPE OF PROPERTY Residential

NAME (common) Mr. Prosper

NAME (historic) \_\_\_\_\_

ADDRESS East of Box 42

Packenham Road

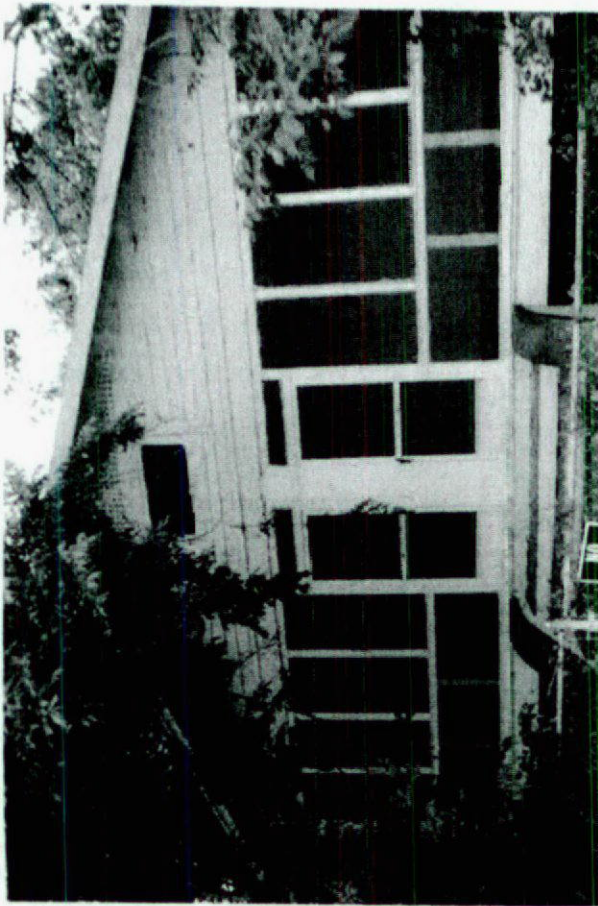
DATE OF CONSTRUCTION circa 1915-20

II. 1. Condition Fair

2. Style Bungalow - altered

3. Floor Plan 1 story

4. Building Material Clapboard with a  
tin roof



## III. Physical description of property and historic significance

This house has a gabled roof. The front porch has been screened. There are three square columns. The porch is on piers and has a wooden floor. There are two front doors and two windows. Each window has four horizontal lights. The gable window has a diamond shape. There is a lattice gable vent.

Rating: Gold - If restored, if not, no rating

IV. Recorded by Planning Commission

Date June, 1982

For St. Bernard Parish

V. Sources consulted Dr. Cizek

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## STANDING STRUCTURES SURVEY

Site Number 7.40I. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range \_\_\_\_\_ Section 7TYPE OF PROPERTY ResidentialNAME (common) Eunice Zimmer

NAME (historic) \_\_\_\_\_

ADDRESS Rcute 1 Box 40Packenham RoadDATE OF CONSTRUCTION circa 1920II. 1. Condition Good2. Style Bungalow3. Floor Plan 1 story shotgun4. Building Material Clapboard with  
a tin roof

## III. Physical description of property and historic significance

This house has a gabled roof with an overhang. The front porch has two square columns on piers. The porch floor is cement. There is a screened side porch at the back of the house. The front door is wood and glass. There is a louvered gable vent. A shed is found on the property.

Rating: NoneIV. Recorded by Planning CommissionDate June, 1982For St. Bernard Parish

V. Sources consulted \_\_\_\_\_

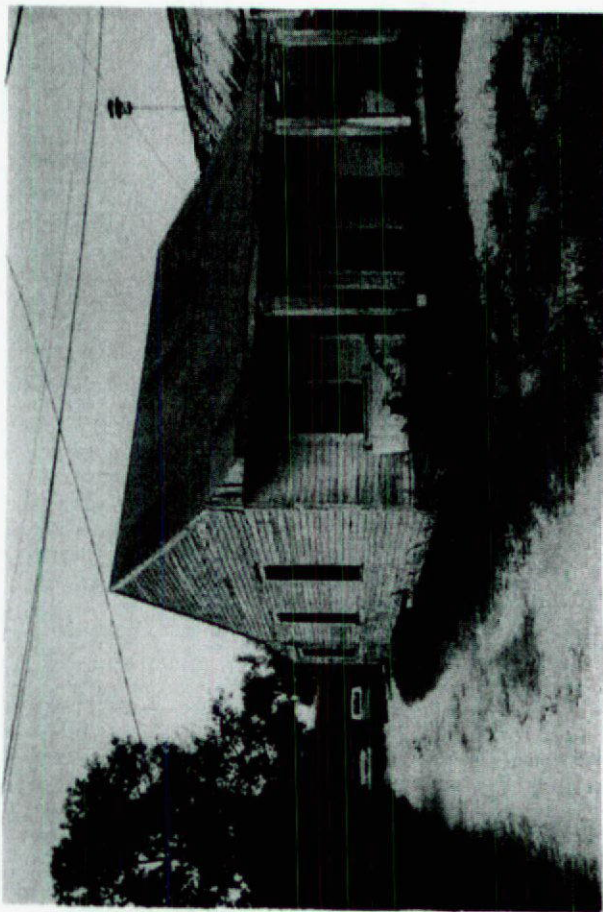
## STANDING STRUCTURES SURVEY

Site Number 8.6148EI. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 133 Range 13E Section 7TYPE OF PROPERTY ResidentialNAME (common) Joseph Meraux

NAME (historic) \_\_\_\_\_

ADDRESS 648-E. St. Bernard Hwy.DATE OF CONSTRUCTION circa 1850-90II. 1. Condition Deteriorated2. Style Isleros' cottage/creole cott.3. Floor Plan 1 story cottage4. Building Material Clapboard with a  
tin roof.

## III. Physical description of property and historic significance

This house has a double pitch roof. The porch has four square columns and a wooden floor. The house is on brick piers. Steps to the porch are wooden. There are two front doors with double batten shutters. The two front windows also have double batten shutters.

Rating: Red-could be green or blue if properly restored.

IV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

44-00534

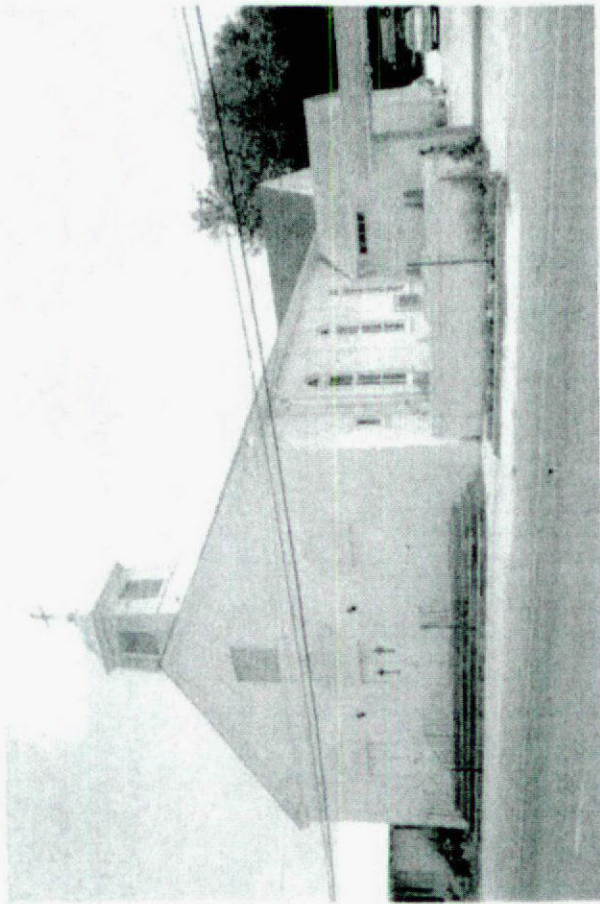
## STANDING STRUCTURES SURVEY

Site Number 8.6923EI. PARISH St. Bernard

MUNICIPALITY \_\_\_\_\_

USGS QUAD ChalmetteTownship 13S Range 13E Section 8TYPE OF PROPERTY ChurchNAME (common) Our Lady of Lourdes

NAME (historic) \_\_\_\_\_

ADDRESS 6923 East St Bernard  
HighwayDATE OF CONSTRUCTION 1916II. 1. Condition Excellent2. Style Spanish Revival3. Floor Plan Cruciform4. Building Material Clapboard with  
a slate and asbestos shingled roof

## III. Physical description of property and historic significance

This is a one story church. There are three front double-door entranceways. Those two on the left and right sides have sealed fanlights. The main entranceway has a pediment shaped trim. The church facade has a large, central blind arch. A louvered vent is located above the main entrance. The bellfry has four louvered vents. Each side window, seen in the above picture has six lights and a fanlight. These side windows are stained glass.

Rating: Blue-well detailed and proportioned important religious structureIV. Recorded by Planning CommissionDate June, 1982For St. Bernard ParishV. Sources consulted Dr. Cizek

DIVISION OF ARCHAEOLOGY AND HISTORIC PRESERVATION  
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ISSUES AND CONCERNS MEMORANDUM  
SINCLAIR TRACT DEVELOPMENT  
FOR CONTAINER TERMINAL AND INDUSTRIAL PARK  
BY PORT OF NEW ORLEANS

This Memorandum is a summary of the St. Bernard Port's main concerns and some general St. Bernard Parish concerns with respect to the lease and development by the Board of Commissioners of the Port of New Orleans (the "Port of New Orleans") of approximately 675 acres located at Mile Marker 86 in St. Bernard Parish, Louisiana (the "Sinclair Tract"). The Port of New Orleans stated the primary purpose for this lease and development is the operation of a container port on the property, but the Port of New Orleans will develop a portion of the property not adjacent to the waterfront for other uses.

CONCERN: THE IMPACT OF THE OPERATIONS AT THE PORT OF NEW ORLEANS'S TERMINAL AT THE SINCLAIR TRACT ON OPERATIONS AT THE ST. BERNARD PORT.

The St. Bernard Port's facilities engage in the berthing, handling, and storage of bulk, break bulk, and general cargo. The Parish of St. Bernard and the State have a large investment in these current operations and in the St. Bernard Port's facilities. A container terminal at the Sinclair Tract will not compete with or negatively impact these current operations at the St. Bernard Port as long as the Sinclair Tract operations do not include the berthing, handling and storage of bulk, break bulk or general cargo that is not transported in container vessels. For that reason, the St. Bernard Port needs assurance that these bulk, break bulk or general cargo non-container vessel operations not be conducted at the Sinclair Tract.

CONCERN: THE NEGATIVE IMPACT THAT THE INGRESS AND EGRESS OF TRUCKS AND VEHICLES AT THE PORT OF NEW ORLEANS' TERMINAL AND INDUSTRIAL PARK WILL HAVE ON THE EXISTING ROADS AND TRAFFIC IN ST. BERNARD PARISH AND THE INFRASTRUCTURE AND IMPROVEMENTS REQUIRED TO COUNTER THIS IMPACT.

Current LA 46, 39 and 47 will not be able to accommodate the increased truck and vehicular volume that will be generated by a large container terminal and industrial park. This terminal and industrial park will necessitate (i) new infrastructure providing truck access from I-10 to and from LA 47, (ii) a new route from LA 47, along the 40 Arpent Canal to the Sinclair Tract, and (iii) new overpasses at LA 39 and 46. Improvements to LA 46 and LA 39 and other roadway improvements will also be required to address increased truck and vehicular traffic. In addition, the IHNC Lock Replacement project must be coordinated with the Sinclair Tract development and possibly expanded to accommodate this increased traffic. Traffic studies must be conducted to identify the best truck and vehicle routes and the new infrastructure and improvements that will be necessary. The St. Bernard Port and St. Bernard Parish need assurance that these traffic studies will be prepared, that the needed infrastructure and improvements will be constructed and maintained and that St. Bernard Parish will not be required to pay the costs.

CONCERN: THE NEGATIVE IMPACT OF ADDITIONAL RAIL TRAFFIC ON THE NORFOLK SOUTHERN RAIL LINE ALONG LA 46 AND LA 39 IN ARABY AND THE INFRASTRUCTURE AND IMPROVEMENTS REQUIRED TO COUNTER THIS IMPACT.

The operation of the Port of New Orleans' container terminal and industrial park at the Sinclair Tract will engender increased rail volume and this increased train volume will have a negative impact on the current

crossings of the Norfolk Southern Rail Line on LA 39 and 46 in Arabi. East-west vehicle ingress and egress to and from the St. Bernard Port, the refineries operating along the Mississippi River in St. Bernard Parish, as well as, the residential and retail sections of St. Bernard Parish will be blocked for extended periods of time by frequent and long unit trains. Rail transportation studies must be conducted and new rail infrastructure, along with overpasses for vehicular traffic on LA 46 and LA 39, must be constructed and maintained. The St. Bernard Port and St. Bernard Parish need assurance that these rail traffic studies will be prepared, that the needed infrastructure and improvements will be made and that St. Bernard Parish will not be required to pay the costs.

CONCERN: THE STRAIN ON ST. BERNARD PARISH'S RESOURCES AND INCOME THAT WILL BE CREATED BY THE INCREASED GOVERNMENTAL SERVICES THAT THE PARISH WILL HAVE TO PROVIDE DURING THE CONSTRUCTION AND OPERATION OF THE PORT OF NEW ORLEANS' TERMINAL AND INDUSTRIAL PARK.

St. Bernard Parish will be required to provide and maintain increased water, sewerage, drainage, fire protection, police, public education, traffic safety, EMS, homeland security and other governmental services to and by reason of the Port of New Orleans facility and those constructing, working at or using that facility. However, the property and improvements owned by the Port of New Orleans are likely to be exempt from Louisiana and Parish ad valorem taxation. Studies must be prepared identifying the increased services that will need to be provided, and the St. Bernard Port and St. Bernard Parish need assurance that St. Bernard Parish will be provided with the increased revenues needed to pay the cost of these increased services and that this cost will not be imposed on the taxpayers of St. Bernard Parish.

CONCERN: THE IMPACT OF THE PORT OF NEW ORLEANS' OPERATIONS ON NEIGHBORING RESIDENTIAL AREAS AND ON INDUSTRIAL DEVELOPMENT IN ST. BERNARD PARISH AS A WHOLE.

The Sinclair Tract is located in a residential area in Meraux and borders Trist Middle School, which serves 6<sup>th</sup>-8<sup>th</sup> grade students. The needs and concerns of the surrounding St. Bernard Parish residential area must be accommodated in the Port of New Orleans' plans. The development must also be planned and operated in a way that benefits future industrial and other economic development within St. Bernard Parish, as well as, the development of other property owned by the Port of New Orleans in the eastern portions of Orleans Parish. The St. Bernard Port and St. Bernard Parish need assurance that the Port of New Orleans will coordinate and work with the St. Bernard Port and St. Bernard Parish to preserve the residential character of the surrounding Meraux neighborhoods and to promote future industrial and other development in St. Bernard Parish.

CONCERN: THE CURRENT GOVERNING BODY OF THE PORT OF NEW ORLEANS, WHICH WILL PLAN AND OPERATE THE SINCLAIR TRACT FACILITIES, WILL NOT ADDRESS THE NEEDS AND CONCERNS OF THE ST. BERNARD PORT OR THE ST. BERNARD PARISH RESIDENTS, BUSINESSES OR PARISH GOVERNMENT.

Currently, the Board of Commissioners of the Port of New Orleans is comprised of seven appointed commissioners, and according to the by-laws of that Board, the appointed commissioners consist of four representatives of Orleans Parish, two representatives of Jefferson Parish (the Port of New Orleans has no facilities in Jefferson Parish) and only one representative of St. Bernard Parish. The proposed Sinclair Tract facility will be the Port of New Orleans' major, and possibly only, container terminal, and it will be located in St. Bernard Parish. That facility will have a huge and unique impact on the residents, businesses, and future development in St. Bernard Parish and will make St. Bernard Parish a large stakeholder in the Port of New Orleans' operations. For that reason, St. Bernard Parish needs to have its concerns

represented by at least three commissioners on the Board of Commissioners of the Port of New Orleans, with Orleans Parish retaining its four representatives and Jefferson Parish, its two representatives.

CONCERN: THE INFORMATION THAT HAS BEEN PROVIDED TO THE ST. BERNARD PORT IS NOT SUFFICIENT TO PERMIT THE ST. BERNARD PORT OR ST. BERNARD PARISH TO EVALUATE THE PORT OF NEW ORLEANS' PROPOSED DEVELOPMENT AND USE OF EITHER THE TERMINAL PORTION OR THE BACK PORTION OF THE SINCLAIR TRACT OR THE WAYS IN WHICH THIS DEVELOPMENT AND USE WILL AFFECT THE ST. BERNARD PORT AND ST. BERNARD PARISH GENERALLY.

- The Port of New Orleans has commissioned AECOM Technical Services LLC ("AECOM") to evaluate and prepare a report on the suitability of the Sinclair Tract for the Port of New Orleans' planned development. In addition to the vehicular traffic, rail traffic and other studies that need to be performed (as detailed in the prior sections of this Memorandum), the St. Bernard Port needs to be provided with (i) the final AECOM report when it has been prepared, and (ii) prior to that final report, with preliminary copies of the studies for the report as they are prepared, including studies of the possible development's economic impact, road, highway, rail, and other traffic impacts, community impact, environmental impact, navigation feasibility, and feasibility.
- The St. Bernard Port also needs the Port of New Orleans' plans for the docks, berths, and other infrastructure that it anticipates constructing as these plans are developed along with its plans for the use of the remainder of the Sinclair Tract.
- The St. Bernard Port requests a copy of the appraisal obtained by the Port of New Orleans setting out the price offered for the Sinclair Tract and all additional information and analysis used by the Port of New Orleans to determine that price.