RAM Terminal Concerns

• Immediate and cumulative conflicts with use of lateral sand bars
• Especially Economically unviable
• Impacts to Historic Ironton –EJ concerns
• Rail Impacts –Gretna, Jefferson Parish
• Health Impacts (PM 2.5 + 10, heavy metals)
• Climate (Executive Order 13653)
• Obvious need for an EIS
Why this site?

--only Deepwater port with Rail on the Lower Mississippi River

Insufficient Alternatives given the impact to a federally authorized project with +$1B dedicated funding
Cannot discount impact to property values and public safety along the NOGC route

An alternative rail route has failed to win FEMA and TIGER funding for 9 years

NOGC Re-routing is highly speculative due to consistent lack of funding
Coal Terminal Concerns

• Immediate and cumulative conflicts with use of lateral sand bars
• Economically unviable
• Barge and Ship Traffic Concerns in the River
• Rail Impacts to property values
• Health Impacts (PM 2.5 + 10, heavy metals)
• Unprotected from Storms
• Climate (Executive Order 13653)
Projected Concerns from 2012 have manifested

- Immediate and cumulative conflicts with use of lateral sand bars (*Alliance South, Point Celeste*, and *Davant*)
- Economically unviable (says *Massey Coal*)
- Barge and Ship Traffic Concerns in the River (*MG Midstreamer, CHS*)
- Rail Impacts to property values (*Jeff Parish*)
- Health Impacts (PM 2.5 + 10, heavy metals)
- Unprotected from Storms (*Stolthaven I-wall*)
- Climate (Executive Order 13653)
Consistency

Reports that the material in the sandbar clogs the slurry pipeline—need investigation

This Lake Hermitage project was plagued with delays, which means less wetland acreage at the end of the project
Projected Concerns from 2012 are manifest

• Immediate and cumulative conflicts with use of lateral sand bars (*Alliance South, Point Celeste*, and Davant)
  – CPRA now reportedly investigating after refusing in 2013
    • Assigning blame to dredging contractor
    • Waste of public monies for preventable, foreseeable, doubly known inconsistency

• Contamination Concerns
  – 6 mo USGS study of PAH, metal flows into dragonflies and sediment. In PNW, no Petroleum Coke
Tracers

In terms of Responsible Parties, there are neutral tracers that can be added to stored or spilled product to assign responsibility (Society for Conservation Biology)

There are studies that can be conducted on current conflicts and contamination vectors –1000 pit tags

Sediment can be modelled and was in 2012. Assignment of RP is obvious as gravity.
Inconsistency:

1) Barge traffic and ship terminal vs massive flow of waters?

2) Loss of river power => loss of sediment => loss of wetland

3) Contamination of River and Sediment should be investigated

Figure 9. Run #5, Streamlines Back Calculated from the Diversion Channel.
Inconsistency:

CPRA MOA only slightly deals with Consistency Issue #1

While bypassing public interest on management of the diversion

Unenforceable

No terms of mediation

At the very least, this MOA should be included in a 404 permit
Climate – Carbon Counts

Gulf Coast Coal Terminals are estimated to increase CO2 by ~500 MT over ~20 years (2012 estimate, EO calls for some estimate)

Lack of accounting is inconsistent with Recent Executive Order E.O. 13653 of Nov 1st, 2013 78 FR 66817
Sections 2 and 3 on Resilient Investment and Managing Lands and Waters

Near –term impact – increasing carbon emissions in the present day means the loss of up to 2,000 square miles of wetland over the next 50 years from sea level rise. certain assets are “unburnable.”
Conclusion

RAM Terminal conflicts with the Myrtle Grove Medium Diversion and the Mid-Barataria project, *according to the engineers that designed the project for the Corps*, and must not be permitted. *Conflicts with marsh creation as well.*

Investigation into the Costs and Benefits of such a terminal are warranted in an EIS, --public hearings for *real estate data* and *operational costs to dredging*.

Given the recent *bubble* in Coal exports (5-6 facilities, *IMT layoffs*), a PEIS for the lower Mississippi is warranted, on the basis of evaluating increases in Rail construction, Rail traffic, Barge traffic, and conflicts with use lateral sand bars for protection of the water supply and coastal restoration.