DEPARTMENT OF HEALTH AND HUMAN SERVICES Office of the Secretary

Office of the Assistant Secretary for Health
Washington, D.C. 20201

August 3, 2023

Brad Laborde
Eastern Evaluation Branch Chief
New Orleans District, U.S. Army Corps of Engineers
7400 Leake Avenue
New Orleans, LA 70118

Dear Mr. Laborde:

I am writing to provide comments on the proposed Greenfield Louisiana Grain Export Terminal, slated to be located on the west bank of St. John the Baptist Parish in Wallace, Louisiana. As it is currently proposed, grain and other farm products will be shipped from local and regional farmers to the facility, from which these products will be transferred to silos for storage and ultimately transported to end users globally. Under the current plan, the facility will include 54 grain silos, a conveyor belt, railroad infrastructure and a dock. The facility is anticipated to facilitate the transportation of corn, wheat, and soybeans down the Mississippi River from the Midwest on barges. These agricultural products would be loaded onto cargo ships at the proposed Wallace terminal to be delivered around the globe.[1]

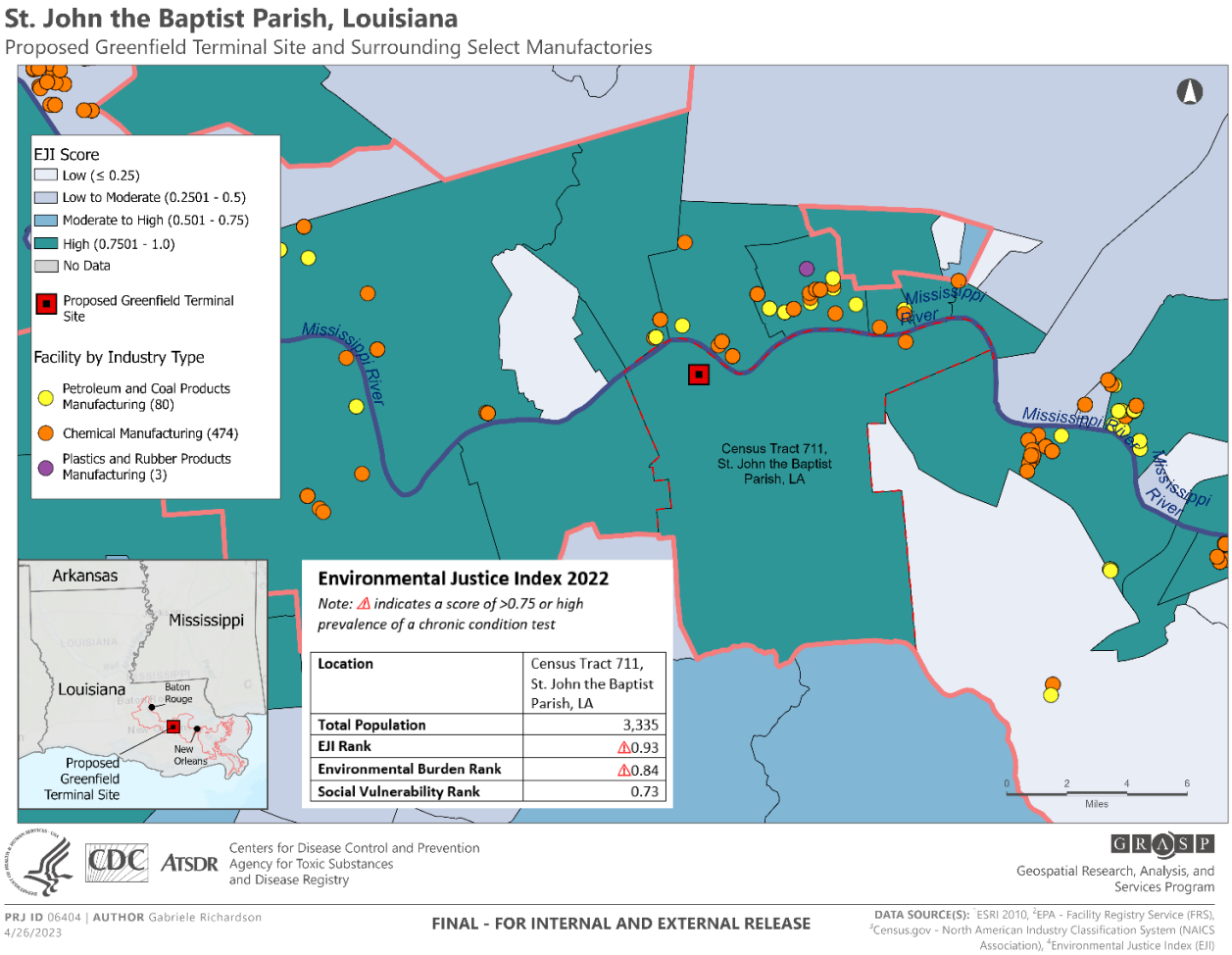
The U.S. Department of Health and Human Services recently established an Office of Environmental Justice (OEJ) within its Office of Climate Change and Health Equity in the Office of the Assistant Secretary for Health. OEJ's mission is to protect the health of disadvantaged communities and vulnerable populations on the frontlines of pollution and other environmental hazards that affect health. In pursuit of environmental justice, we respectfully submit these comments with a specific focus on health equity, recommending that the potential cumulative impacts of the grain elevator infrastructure, in addition to existing environmental factors, be taken into consideration to protect the health of the residents of the St. John the Baptist Parish, Louisiana.

Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, defines "environmental justice" as, "[T]he just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment so that people: (i) are fully protected from disproportionate and adverse human health and environmental effects (including risks) and hazards, including those related to climate change, the cumulative impacts of environmental and other burdens, and the legacy of racism or other structural or systemic barriers; and (ii) have equitable access to a healthy, sustainable, and

1 "Project Overview". Greenfield Louisiana, LLC. (n.d.). See https://irp.cdn-website.com/3697170b/files/uploaded/ProjectOverview.pdf

resilient environment in which to live, play, work, learn, grow, worship, and engage in cultural and subsistence practices." [2]

Figure 1. Proposed Greenfield Terminal Site and Surrounding Select Manufactories.



According to the Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances Disease Registry's Environmental Justice Index (EJI or Index), the proposed site of the Greenfield Louisiana Grain Export Terminal will add to the many existing manufacturing industries and other existing sources of environmental burden for the St. John the Baptist Parish community and neighborhoods surrounding the Lower Mississippi River (See Figure 1). The Environmental Justice Index (EJI) scores census tracts using a percentile ranking, which represents the proportion of tracts that experience cumulative impacts of environmental burden and injustice equal to or lower than a tract of interest. According to the Index, many of the communities along the Lower Mississippi River already experience worse cumulative impacts than 75% or more of communities nationwide. Specifically, the communities near the proposed

[2] Executive Order 14096, "Revitalizing Our Nation's Commitment to Environmental Justice for all" 88 Fed. Reg. 25251 (April 21, 2023). See https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all.

site of the grain export terminal are surrounded by petroleum and coal products, chemical, plastics, and rubber manufacturing companies.

The EJI data depict that the community in the St. John the Baptist Parish, where the Greenfield Louisiana Grain Export Terminal will be located, already experiences worse cumulative impacts than 93% of communities nationwide. Because of the existence of more than 470 chemical manufacturing industries and 80 petroleum and coal products manufacturing industries, the communities in and around the St. John the Baptist Parish rank among the highest in the nation for environmental burden (0.84), which takes into consideration, but is not limited to, proximity to potentially hazardous and toxic sites (See Figure 1).

Furthermore, communities in St. John the Baptist Parish consistently score in the 99th-100th percentile nationwide for air toxics cancer risk. In 2014, the average cancer risk from air toxics for census tracts in St. John the Baptist Parish was 465 per million, more than 15 times the national average.[3] The communities surrounding the proposed site for the Greenfield Louisiana Grain Export Terminal are also faced with additional social burdens including, but not limited to, high percentages of unemployment, lack of internet access, and lack of health insurance, adding to the cumulative impacts to the health of this parish, with a high percentage of the resident population that identify as a racial or ethnic minority.

In addition, the Greenfield Louisiana Grain Export Terminal project will place additional health and quality of life burdens on this already disadvantaged community that is trying to preserve historical and cultural traditions. The National Trust for Historic Preservation has recently identified the West Bank of St. John the Baptist Parish as one of America's 11 Most Endangered Historic Places for 2023, specifically focusing on existing and potential heavy industrial development within this nationally significant historic area. Moreover, access to greenspace is a key factor of community resilience. According to the CDC's 2020 data from the National Environmental Public Health Tracking Network - CDC - Info By Location, residents of St. John the Baptist County are less likely to live within a mile of a park when compared with state-level data. Specifically, 25% of the population residing in St. John the Baptist County lived within half a mile of a park, compared with 54.6% of Louisiana residents who lived within half a mile of park.

I respectfully encourage the U.S. Army Corps of Engineers to consider the complex and multi-faceted nature of the environmental burdens and health inequities that the communities of St. John the Baptist Parish are contending with and how the addition of the proposed Greenfield Louisiana Grain Export Terminal may contribute to or exacerbate these the negative consequences of the physical/built environment and sociocultural environmental factors.

Specific actions may include: 1) Conducting a comprehensive environmental review and cumulative risk assessment for potential impacts of the proposed grain terminal; 2) Expanding consultation with multiple Federal agencies, with an emphasis on public health, cultural

[3] Enviro Atlas, "Cumulative Cancer Risk Per Million from Air Toxics". U.S. Environmental Protection Agency (January 2021). See https://enviroatlas.epa.gov/enviroatlas/DataFactSheets/pdf/Supplemental/Cancerriskcumulative.pdf

preservation, and the environment, when determining avoidance and mitigation strategies; 3) Including zero-emission plans as mitigation measures for supply chain transport activities related to this proposed project, including alternative maritime power, road vehicles, and yard equipment. Thank you in advance for considering these and other health protective measures as part of a whole-of-government approach to environmental justice.

<< Signed >>

Rachel L. Levine, M.D.
Assistant Secretary for Health

Map Text Descriptions

Proposed Greenfield Terminal Site and Surrounding Select Manufactories

This map depicts cumulative environmental impacts on health, as measured by the Environmental Justice Index (EJI), for communities surrounding the proposed Greenfield Terminal Site within the St. John the Baptist Parish of Louisiana (highlighted in red). The Environmental Justice Index ranks communities nationwide on a continuous scale of 0-1, with 0 representing low cumulative impacts (represented in light blue) and 1 representing high cumulative impacts (represented in dark blue-green). Of the 7 communities within 5 miles of the proposed Greenfield Terminal Site, 6 have a score of 0.75 or higher when compared to communities nationwide. Out of these 6 communities, 3 have a score of 0.90 or higher.

St. John the Baptist Parish and neighboring communities (highlighted in red) host 80 petroleum and coal products manufactories (represented by yellow points), 474 chemical manufacturing facilities (represented by orange points), and 3 plastics and rubber products manufactories (represented by purple points). The proposed Greenfield Terminal Site (represented by a red square with a black center) is located in Census Tract 711 (highlighted with a dashed red line) and is along the Mississippi River. Census Tract 711 has a high EJI rank of 0.93, an Environmental Burden Rank of 0.84, and a Social Vulnerability Rank of 0.73.

For assistance, please email eji_coordinator@cdc.gov.