September 14, 2020

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Re: Emergency Authorization to remove a portion of the Mississippi River Gulf Outlet (MRGO) Closure Structure in St. Bernard Parish, Louisiana.

St. Bernard Parish Government is requesting an emergency authorization to remove the top 19' of the MRGO Rock Closure Structure to provide relief for excessive volumes of floodwater from the resulting storm surge of extreme weather events and to aid in recreational and commercial fisheries navigation. According to the Parish, continuous inundation from floodwaters can have a damaging effect on the health and resiliency of St. Bernard's coastal marine habitats and the commercial fisheries they support.

Louisiana is about to see the third major storm approach the state this year, and it will again raise the potential to disrupt the commercial fishing industry and impact the health of St. Bernard's tidal wetlands and waters. As of 14 SEPT 2020, the National Weather Service is predicting Hurricane Sally will bring upwards of 11' of storm surge throughout the St, Bernard Parish coastline, and between 4-10' along the shores of both Lake Pontchartrain and Maurepas. St. Bernard Parish Government believes opening the closure structure would not only provide immediate floodwater drainage from Shell Beach for the waterways throughout the Parish, but for nearby St. Tammany, Ascension, Tangipahoa, Livingston, St. John the Baptist, St. Charles, Jefferson, and Orleans Parishes as well.

Additionally, in the years since the closure structure was implemented, commercial fisheries traffic has been forced to use secondary access routes from launches and harbors to the fishing grounds after extreme weather events. This has resulted in significantly more hazardous travel along these

routes with increased traffic and travel miles due to flood debris blocking local waterways. These secondary routes are also already seeing significant erosion in sensitive areas, in large part from increased wake energy generated by the jump in traffic. St. Bernard Parish Government believes opening the closure structure will therefore provide additional waterway access that are desperately needed by commercial fisheries industry to conduct work post-storm.

Therefore, St. Bernard Parish Government is requesting that the relevant regulatory agencies issue an Emergency Authorization to begin work on de-grading the upper portion of the MRGO Rock Closure Structure near the intersection of Bayou LaLoutre and the man-made waterway. St. Bernard Parish proposes to remove approximately 19' of the structure's height, 12' of which would be below ordinary low water levels, along the length of the structure itself. The Parish is of the opinion that enough of the structure will remain in place to provide the intended obstacle to the tidal encroachment of saline waters it was designed to represent.

Drawings attached to this document show St. Bernard Parish Government's proposed work. According to St. Bernard Parish, a contractor is on stand-by, ready to mobilize to perform the work in rapid fashion. Also, to indicate their support of the request, The St. Bernard Parish Council is ready to pass a resolution in favor of conducting this work.

According to St. Bernard Parish Government, any amount of freshwater outflow will be helpful in mitigating the severe and immediate flooding of the Parish. Additionally, storm protection systems constructed in the wake of Hurricane Katrina, such as the Bayou Bienvenue triangle structures, should limit any salinity increases in the area north of the structure.

The risk to life, vessels, and the health of St. Bernard's residents and commercial fisheries constitutes a legitimate emergency which can be mitigated to some degree by authorizing St. Bernard to move forward with urgency. By this letter, St. Bernard Parish Government is formally requesting Emergency Authorization to proceed with this work.

If you would like to discuss this further, please do not hesitate to contact me by phone at (985) 662-5501, fax at (985) 662-5504, or e-mail at jprather@elosenv.com.

Sincerely,

ELOS Environmental, LLC

James "Jay" Prather, III
Vice- President/Environmental Scientist

Figure 1: TopoVicinity Map

MRGO Opening

This figure was prepared utilizing public and proprietary data. It should not be used to establish any legal boundaries or specific locations. ELOS Environmental, L.L.C., is not responsible for any usage of this figure contrary to its original, intended purpose.

Legend:

- Site Outline
- Waterbody
- Highway
- Stream/River
- Roadway

Section: 21
Township: 14 South
Range: 15 East

N W E S

Feet
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ELOS
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Hammond, Louisiana 70403
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F:\KLE\MRGO Opening\GIS Maps\Permit\Proposed Cut\Figure 1_TopoVicinity Map

Figure 2: Plan View

MRGO Opening

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Legend:

Site Outline

These are not Engineering Drawings and should not be used for Construction.

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F:\KLE\MRGO Opening\GIS Maps\Permit\Figure 2_Plan View

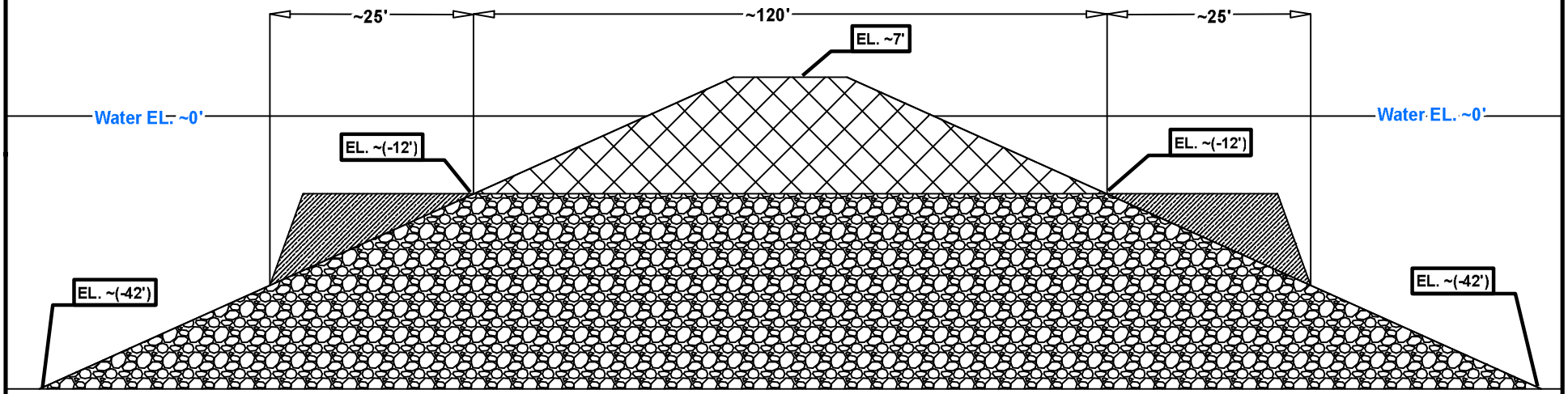

Figure 3: Typical Section

MRGO Opening

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Legend:

- Excavation Area
- Fill Area

These are not Engineering Drawings and should not be used for Construction.

ST. BERNARD PARISH GOVERNMENT

Scale = Not to Scale

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