Integrated Final Report to Congress and Legislative Environmental Impact Statement

for the

Mississippi River – Gulf Outlet Deep-Draft De-authorization Study

Volume 1
MAIN REPORT

by
U. S. Army Corps of Engineers
New Orleans District

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LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

Mississippi River-Gulf Outlet (MRGO) Deep-Draft De-authorization Study

LEAD AGENCY: U.S. Army Corps of Engineers (USACE), Mississippi Valley, New Orleans District.

ABSTRACT: The U.S. Congress has directed the Secretary of the Army, acting through the Chief of Engineers, to develop a plan for de-authorization of deep-draft navigation for the MRGO from the Gulf Intracoastal Waterway (GIWW) to the Gulf of Mexico. The plan shall be integrated into the Louisiana Coastal Protection and Restoration Plan. The MRGO is authorized as a 36-foot deep, 500-foot bottom width waterway (38-foot deep, 600-foot bottom width in the Bar Channel), connecting the city of New Orleans to the Gulf of Mexico. The Sound Reach of the MRGO experienced severe shoaling during Hurricane Katrina. A collaborative planning effort with numerous stakeholders identified common measures supported by many stakeholders. For planning purposes, the future without de-authorization was determined to be continuation of the authorized deep-draft channel at full width. In the December 2006 Interim Report, four alternatives were developed that would allow continued shallow-draft navigation, three that completely closed the MRGO from the GIWW to the Gulf of Mexico, and one that would cease all navigation maintenance activities on the MRGO from the GIWW to the Gulf of Mexico. An economic evaluation of channel navigation use does not demonstrate a Federal interest in continued operation and maintenance of the channel. An assessment of the benefits to costs of the channel shows a ratio of less than unity. All alternatives that included maintenance of shallow-draft navigation were screened from further consideration based on this economic analysis. Two alternatives that would completely close the channel were eliminated due to cost. Four alternatives were studied in detail: The Future Without De-authorization; Alternative 1 – Construct a Total Closure Structure across the MRGO near Bayou La Loutre Immediately; Alternative 2 – Phased Construction of a Total Closure Structure across the MRGO near Bayou La Loutre (Construction would begin with a weir and be completed with a total closure structure); and Alternative 3 – Cease All MRGO Operations and Maintenance Dredging Activities. Alternative 2 was later dropped from further evaluation. Present channel conditions accommodate navigation up to a 22-foot draft. Vessels may attempt to navigate the channel after it is de-authorized; therefore, some form of positive closure of the channel should be constructed. The most suitable closure would be a total closure structure of rock. Locating this structure is based on two main considerations: preventing navigation and engineering criteria. Closure to navigation could occur at any point along the channel, but closure near the Bayou La Loutre ridge provides the most stable foundation because of proximity to the historic Bayou La Loutre ridge and it is the narrowest section of the channel (see Section 2.5.1, Preliminary Engineering on Alternatives Evaluated in Detail). Alternative 1 has been identified as the Recommended Plan. The Recommended Plan calls for de-authorization of navigation on the MRGO from mile 60 at the southern bank of the GIWW to the Gulf of Mexico. This plan could produce environmental benefits through partial restoration of estuarine salinity gradients and tidal conditions. It also could prevent the loss of a significant percent of the 2,343 net acres of marsh expected to be lost with the future without de-authorization. Salinity stratification would be reduced north of the total closure structure which is anticipated to reduce salinity stratification in Lake Pontchartrain. This could improve the aquatic ecosystem in the lake. All of these factors outweigh the disadvantage of Alternative 1, which is a slightly lower average annual net economic benefit than Alternative 3. The existing MRGO bank stabilization features and jetties would be de-authorized, but remain in place. Aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard. The estimated total project construction cost of the total closure structure is $24,684,150. Total average annual costs for the Recommended Plan (including O&M and cost to navigation) are estimated at approximately $5.1 million and total average annual benefits are estimated at $12.5 million. This results in an estimated total average annual net benefit of $7.4 million.

Comments or Questions: Please send comments or questions on this LEIS to the U.S. Army Corps of Engineers, New Orleans District, Attention: Sean P. Mickal., P.O. Box 60267, New Orleans, LA 70160-0267. Phone: (504) 862-2319. **The official closing date of document availability will be 30 days from the date on which the Notice of Availability for this Final LEIS appears in the *Federal Register*.**

EXECUTIVE SUMMARY

S.1. FINAL REPORT TO CONGRESS AND LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

This Final Report to Congress and Legislative Environmental Impact Statement (LEIS) present the findings of a congressionally requested study on the de-authorization of deep-draft navigation on the Mississippi River-Gulf Outlet (MRGO) between the Gulf Intracoastal Waterway (GIWW) and the Gulf of Mexico. This document provides comprehensive documentation of the MRGO Deep-Draft De-authorization Study. Traditionally, a Report to Congress and LEIS would be produced as two separately bound documents. However, a single integrated document meets the requirements of the National Environmental Policy Act (NEPA) and the USACE decision-making process without duplication. The main table of contents includes asterisks for traditional NEPA required chapters and sections to allow ready access for those specifically interested in the NEPA compliance review.

The report organization and contents are intended to allow the reader to become familiar with the history of the MRGO Deep-Draft De-authorization Study. The information provided includes study purpose, background, and decision process. The document also describes the direct, indirect, and cumulative environmental effects attributable to alternative plans. Public involvement and agency coordination efforts are documented, as well as technical analyses. The document concludes with a detailed description of the Recommended Plan, which is to construct a total closure structure across the MRGO near Bayou La Loutre in one construction effort.

A Legislative Environmental Impact Statement (LEIS) is the detailed statement required by Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2)(C), to be included in a recommendation or report on a legislative proposal to the Congress. Preparation of a LEIS must conform to the requirements of the NEPA implementing regulations, codified at 40 CFR pts. 1500-1508, except that (1) there need not be a scoping process; and (2) the LEIS shall be prepared in the same manner as a draft statement, but shall be considered the "detailed statement" required by statute, 40 CFR § 1506.8(b).

S.2 STUDY AUTHORITY

The U.S. Congress has directed the Secretary of the Army, acting through the Chief of Engineers, to develop a plan for de-authorization of deep-draft navigation for the Mississippi River-Gulf Outlet (MRGO) from the Gulf of Mexico to the Gulf Intracoastal Waterway (GIWW). The Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (Public Law 109-234), reads in part:

> *"…the Secretary of the Army, acting through the Chief of Engineers, utilizing $3,300,000 of the funds provided herein shall develop a*

comprehensive plan, at full Federal expense, to de-authorize deep-draft navigation on the Mississippi River-Gulf Outlet, Louisiana, extending from the Gulf of Mexico to the Gulf Intracoastal Waterway: Provided further, That, not later than 6 months after the date of enactment of this Act, the Secretary shall submit an interim report to Congress comprising the plan: Provided further, That the Secretary shall refine the plan, if necessary, to be fully consistent, integrated, and included in the final report to be issued in December 2007 for the Louisiana Coastal Protection and Restoration Plan."

House Report 109-494 provides a Congressional conference committee manager's statement accompanying the legislative language further directing that:

"The plan shall include recommended modifications to the existing authorized current use of the Outlet, including what navigation functions, if any, should be maintained and any measures for hurricane and storm protection. The plan shall be developed in consultation with St. Bernard Parish, the State of Louisiana, and affected Federal Agencies."

Congressional direction to prepare a deep-draft de-authorization plan for the MRGO also requires that the plan be fully consistent and integrated with the Louisiana Coastal Protection and Restoration (LACPR) plan. Development of the LACPR plan focuses on identifying a comprehensive plan for flood control, coastal restoration, and hurricane protection in south Louisiana. The future of the MRGO navigation channel is a key decision that affects directions on related projects in the area such as hurricane protection, ecosystem restoration, and navigation. Resolving questions about the future depth and use of the MRGO channel could provide a baseline for developing plans and designs for other related projects. The MRGO de-authorization plan is being integrated into ongoing work to develop and evaluate measures for the LACPR plan. Specific work to integrate the components of the MRGO plan with the LACPR plan includes storm surge modeling, environmental planning, and prioritization. Every effort has been made to accelerate completion of the MRGO Final Report and LEIS in accordance with the Congressional direction found in Title IV, Chapter 3, Section 4304 of the "U.S. Troop Readiness, Veterans' Care, Katrina Recovery, and Iraq Accountability Appropriations Act, 2007" (Public Law 110-28). The MRGO Final Report and LEIS will be transmitted to the Congress as soon as is practicable. The MRGO Final Report and LEIS will also be included in the LACPR Final Report.

At the time this report was being released for State and Agency review, the Water Resources Development Act of 2007 (WRDA 2007) became law expanding the scope of the study authority provided by Public Law 109-234 to include ecosystem restoration. In addition, pursuant to WRDA 2007 Section 7013, upon submission of the final report to Congress, the MRGO from the Gulf of Mexico to Mile 60 at the southern bank of the GIWW is no longer authorized. Section 7013 also authorizes the Secretary of the Army to carry out a plan to close the MRGO and to restore and protect the ecosystem substantially in accordance with the final report subject to the Secretary's determination

that the plan is cost-effective, environmentally acceptable, and technically feasible. This report preliminarily addresses the ecosystem restoration requirements of WRDA 2007; however, a supplemental report to completely address the ecosystem restoration requirements of WRDA 2007 will be submitted at a later date.

WRDA 2007 Section 7013 is provided below in its entirety:

SEC. 7013. MISSISSIPPI RIVER-GULF OUTLET.

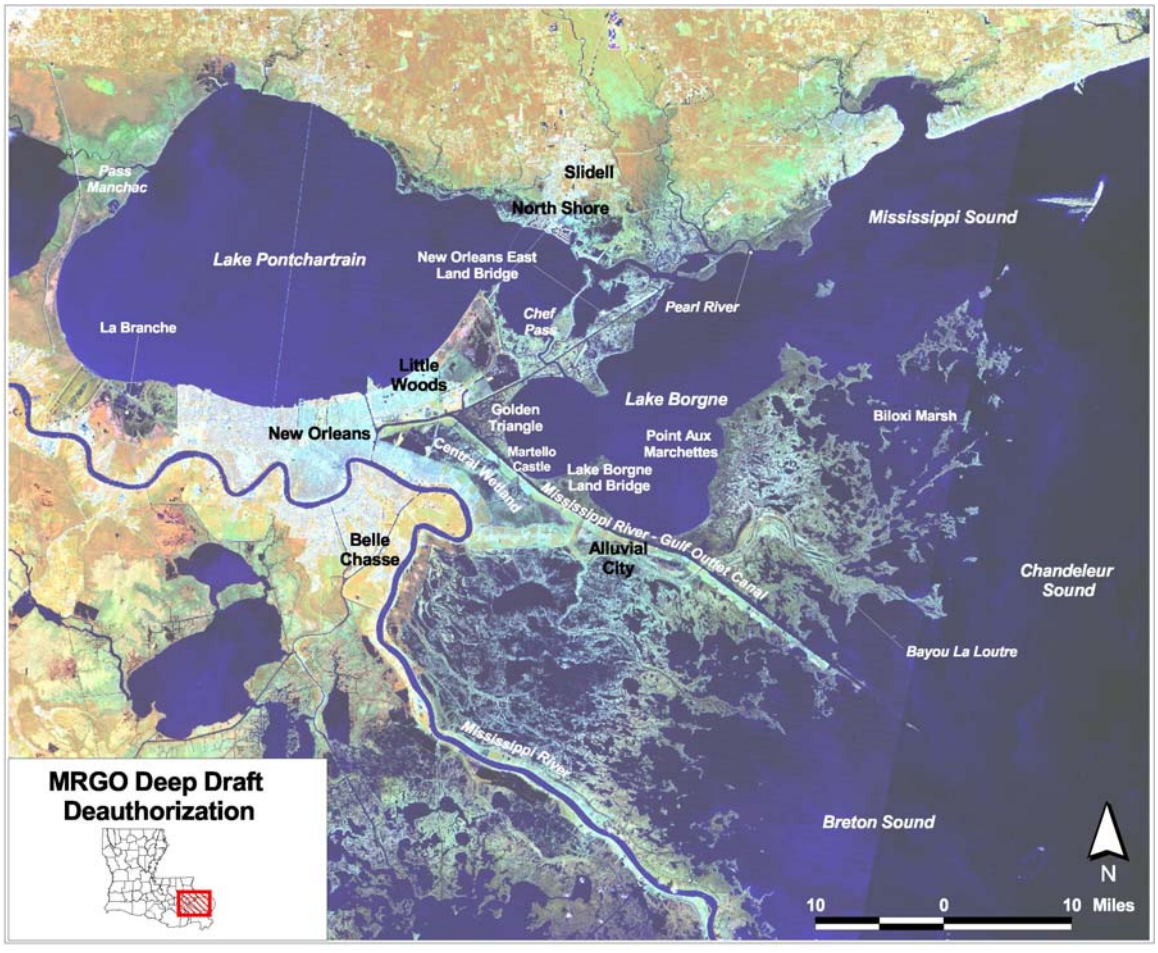
(a) DEAUTHORIZATION.—
(1) IN GENERAL.—Effective beginning on the date of submission of the plan required under paragraph (3), the navigation channel portion of the Mississippi River-Gulf Outlet element of the project for navigation, Mississippi River, Baton Rouge to the Gulf of Mexico, authorized by the Act entitled ‘‘An Act to authorize construction of the Mississippi River-Gulf outlet’’, approved March 29, 1956 (70 Stat. 65) and modified by section 844 of the Water Resources Development Act of 1986 (100 Stat. 4177) and section 326 of the Water Resources Development Act of 1996 (110 Stat. 3717), which extends from the Gulf of Mexico to Mile 60 at the southern bank of the Gulf Intracoastal Waterway, is not authorized.
(2) SCOPE.—Nothing in this paragraph modifies or deauthorizes the Inner Harbor navigation canal replacement project authorized by that Act of March 29, 1956.
(3) CLOSURE AND RESTORATION PLAN.—
(A) IN GENERAL.—Not later than 180 days after the date of enactment of this Act, the Secretary shall submit to the Committee on Environment and Public Works of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives a final report on the deauthorization of the Mississippi River-Gulf outlet, as described under the heading ‘‘INVESTIGATIONS’’ under chapter 3 of title II of the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (120 Stat. 453).
(B) INCLUSIONS.—At a minimum, the report under subparagraph (A) shall include—
(i) a plan to physically modify the Mississippi River-Gulf Outlet and restore the areas affected by the navigation channel;
(ii) a plan to restore natural features of the ecosystem that will reduce or prevent damage from storm surge;
(iii) a plan to prevent the intrusion of saltwater into the waterway;
(iv) efforts to integrate the recommendations of the report with the program authorized under section 7003 and the analysis and design authorized by title I of the Energy and Water Development Appropriations Act, 2006 (119 Stat. 2247); and
(v) consideration of—
(I) use of native vegetation; and
(II) diversions of fresh water to restore the Lake Borgne ecosystem.
(4) CONSTRUCTION.—The Secretary shall carry out a plan to close the

Mississippi River-Gulf Outlet and restore and protect the ecosystem substantially in accordance with the plan required under paragraph (3), if the Secretary determines that the project is cost-effective, environmentally acceptable, and technically feasible.

S.3 OVERVIEW OF STUDY AREA

The study area is located in southeastern Louisiana in St. Bernard, Orleans, Jefferson, St. Tammany, St. Charles, St. John the Baptist, and Tangipahoa Parishes. It covers the Middle and the Lower Pontchartrain Basin. The Middle Basin consists of Lake Pontchartrain with its adjacent cities and towns, and surrounding wetlands. The Lower Basin consists of Lake Borgne, the MRGO channel, Chandeleur and Breton Sounds, a small portion of the Gulf of Mexico, and the surrounding wetlands (Figure S.1).

Figure S.1 Study Area



S.4 BACKGROUND ON THE MRGO

The MRGO provides a shorter navigation route from the Gulf of Mexico to the Port of New Orleans tidewater facilities compared to using the Mississippi River to access the port. Construction of the MRGO channel began in 1958 and was completed in 1968.

The channel extends from the Inner Harbor Navigation Canal (IHNC) in New Orleans to the 38-foot depth contour in the Gulf of Mexico (see Figure S.2). The stretch contiguous with the GIWW is the called the GIWW Reach (mile 66-60). Where the channel diverts from the GIWW and runs through wetlands for 37 miles is known as the Inland Reach (mile 60-23), which defines the southwest boundary of the Golden Triangle (see Sections 1.4, 4.5 and 4.6 of the Report). The 23 miles through Breton and Chandeleur Sounds is called the Sound Reach (mile 23-0). The portion in the Gulf of Mexico is the Bar Channel (mile 0 to -9.4). All reaches of the MRGO navigation channel are authorized as a 36-foot deep, 500-foot bottom width waterway with the exception of the Bar Channel which is authorized as a 38-foot deep, 600-foot bottom width waterway.

MRGO channel construction was authorized by a March 29, 1956 Act of Congress (Public Law 84-455) as a modification to the existing project for Mississippi River, Baton Rouge to the Gulf of Mexico. The Act authorized construction of the MRGO Project substantially in accordance with the recommendation of the Chief of Engineers contained in House Document No. 245, 82nd Congress. In addition to recommending construction of the channel, the Chief of Engineers recommended the construction of (1) protective jetties at the entrance to the channel from the Gulf of Mexico; (2) a permanent retention dike through Chandeleur Sound and a wing dike along the islands as required; (3) a turning basin with a project depth of 36 feet Mean Low Gulf (MLG), a width of 1,000-feet and a length of 2,000 feet at the junction of the new channel and the Inner Harbor Navigation Canal; and (4) a highway bridge with approaches to carry Louisiana State Highway 61 over the channel. All of these features were constructed, with the exception of the permanent retention dike through Chandeleur Sound and the wing dike along the islands.

Public Law 84-455 also authorized replacement of the existing IHNC Lock when economically justified. In 1968, the River and Harbor Act (Public Law 90-483) authorized the Michoud Canal Project as a modification of the MRGO Project. The Michoud Canal Project authorized a deep-draft navigation channel in the GIWW and Michoud Canal by enlargement to a depth of 36 feet over a bottom width of 250 feet from the MRGO channel to and including a turning basin 800 feet square at the north end of the Michoud Canal. The Michoud Canal Project was constructed; however, the IHNC Lock has not yet been replaced.

The Federal government is responsible for constructing, operating, and maintaining all features of the MRGO Project, including the Michoud Canal Project, with the exception of the highway bridge and its approaches, which is owned, operated, and maintained by non-Federal entities. The Port of New Orleans, the non-Federal project sponsor, is responsible for furnishing free of cost to the Federal government all lands, easements, rights-of-way, relocations, and disposal areas (LERRDs) required for construction and maintenance of the MRGO Project.

When the MRGO Project was built approximately 3,150 acres of marsh, 100 acres of wetland forest and 830 acres of shallow open water were converted to the deep water navigation channel between the GIWW and the Gulf of Mexico. The dredge material

from channel construction was placed in a disposal area that was about 4,000 feet wide in most places and immediately southwest of the channel. The material in this disposal area was piled about 10 feet high and covered about 12,440 acres of marsh, 1,410 acres of wetland forest and 3,920 acres of shallow open water (USACE 1999).

It is estimated that habitat shifts caused by saline waters brought in by the MRGO might have caused the following in areas adjacent to the MRGO: 3,350 acres of fresh/intermediate marsh and 8,000 acres of cypress swamp converted to brackish marsh and 19,170 acres of brackish marsh and swamp became saline marsh (USACE 1999). Bank erosion along the MRGO has been estimated to occur at rates of between 27 and 38 feet per year on the Inland Reach (USACE 2004). Between 1964 and 1996, 5,324 acres of marsh have been lost adjacent to the MRGO channel (mile 66 to 21).

Operation and maintenance of the MRGO channel has required the construction of additional project features. Bank stabilization measures, also called foreshore protection, have been constructed along several reaches of both the north and south banks of the GIWW and Inland Reaches to prevent sloughing of the bank into the channel and to protect adjacent wetlands and levees. Bank stabilization measures exist in the following locations: 1) MRGO north bank (Miles 66-60, Miles 56 - 50.5, Miles 43 – 41, Miles 37.2 - 36.5, Miles 36.1 - 35.6, Miles 33.8 - 32.6), and 2) MRGO south bank (Miles 66-60, Miles 60 - 47, Articulated Concrete Mattress (ACM) Miles 38.9 - 38.5 and 37.3 to 36.5). In addition, Miles 23.2 to 20.8 of the north and south jetties provide foreshore protection for adjacent wetlands.

Many disposal sites have been designated for maintenance of the MRGO Project. These include numerous upland disposal sites and beneficial use sites for wetlands restoration and nourishment. Dredged material was used beneficially from 1985 to 2003. An average of about 16 acres per year was created in the Inland Reach. Shallow open water areas on the north and south side of the jetties have been used for the placement of dredged material in a manner conducive to wetland creation. An average of about 17 acres per year was created behind the jetties. Dredged material has also been placed at an offshore feeder berm to nourish Breton Island and in shallow open water immediately adjacent to Breton Island to restore barrier island habitat destroyed by erosion and storms. About 21 acres per year were created on Breton Island. In the area behind the south jetty, dredged material has been placed in an effort to create marsh. Dredged material also has been placed at two-mile intervals across Breton Sound in an attempt to create islands. These areas have been used, but no islands have been created. There is also an approximately 5,000 acre EPA-designated Ocean Dredged Material Disposal Site (ODMDS) located parallel to and south of the channel from mile 4 to mile -10. Only the portion from mile -4 to mile -10 has been recently used for disposal.

Direct costs of construction, operation, and maintenance of the MRGO have been funded by the Federal government. These direct costs have totaled over $580 million since 1958. The average annual operations and maintenance expenditures for the MRGO were $12.5 million (in 2000 dollars). However, following tropical storms and hurricanes, supplemental expenditures have often been required to return the MRGO to the

authorized dimensions. Since 1998, the $12.5 million has not allowed for dredging of the channel to its full-authorized dimensions. The GIWW Reach has not been dredged since 1998. From 1998 to 2005, the Inland Reach was maintained to a minimum 300-foot bottom width; the Sound Reach to a minimum 450-foot bottom width; and the Bar Channel to a minimum 500-foot bottom width. There has been no channel maintenance dredging in any reach of the MRGO since Hurricane Katrina in 2005.

Sections of the MRGO experienced severe shoaling during Hurricane Katrina, leading to a current controlling channel depth of approximately 22 feet. The estimated cost to return the channel to authorized dimensions (36 feet deep by 500 foot bottom width; 38 feet deep by 600 foot bottom width in Bar Channel) is $130,444,870 based on October 2006 price levels. However, as discussed previously, for the past several years prior to Hurricane Katrina the channel has been maintained to reduced dimensions in some reaches. The estimated cost to return the channel to 36 feet deep by 300 foot bottom width in all reaches is $62,380,000 based on October 2006 price levels. For this de-authorization study, although no current plans exist to dredge the MRGO, it is important to estimate these costs for comparison purposes in evaluating future alternatives for modifying the channel.

After Hurricane Katrina, the U.S. Congress passed two laws providing funds for emergency repairs or authorizing other actions related to the MRGO navigation channel. Chapter 3, under Division B of Title I of the Department of Defense, Emergency Supplemental Appropriations to Address Hurricanes in the Gulf of Mexico, and Pandemic Influenza Act, 2006 (Public Law 109-148) provided $75,000,000 for authorized operation and maintenance (O&M) activities along the MRGO. Section 2304 of Chapter 3 in Title II of the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (Public Law 109-234) clarified that these funds were to be used for "the repair, construction or provision of measures or structures necessary to protect, restore or increase wetlands, to prevent saltwater intrusion or storm surge." The USACE currently plans to use these funds for shoreline protection and marsh creation in the vicinity of the MRGO and Lake Borgne.

In addition to providing funds to develop a comprehensive plan to de-authorize deep-draft navigation on the MRGO, Public Law 109-234 authorized and provided $350 million for construction of enhanced hurricane protection for the IHNC, and $170 million to armor critical areas of the levee system. Efforts to plan and design these items are underway.

Figure S.2 Mississippi River-Gulf Outlet Area

S.5 PURPOSE AND NEED

The purpose of the study is to provide to Congress a comprehensive plan to de-authorize deep-draft navigation on the MRGO from the GIWW to the Gulf of Mexico. As requested in the authorizing legislation, an Interim Report to Congress was submitted in December 2006. The Interim Report to Congress stated that preliminary analysis indicated that the best plan was to close the MRGO from the GIWW to the Gulf of Mexico to both deep- and shallow-draft navigation. The MRGO comprehensive de-authorization plan is consistent with ongoing design and planning efforts related to storm protection and coastal restoration and long-term planning related to LACPR. In terms of design and planning, this MRGO de-authorization study and subsequent Congressional action defines the navigation future of the MRGO and thus enables other related projects to move forward with more certainty. The study also comports with the Chief of Engineer's "12 Actions for Change" calling for effectively implementing comprehensive systems approaches to water resources problems.

S.6 STUDY GOALS AND OBJECTIVES

The goals and objectives for the MRGO deep-draft de-authorization study are derived entirely from the Congressional authorizing language and accompanying committee report. Those goals and objectives are:

- Develop a comprehensive plan to de-authorize deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico

- Evaluate any navigation functions that should be maintained on the MRGO channel

- Identify measures for hurricane and storm damage reduction

- Refine the plan to be fully integrated and consistent with the LACPR Final Report to Congress

S.7 PUBLIC INVOLVEMENT

In response to Congressional direction to develop a MRGO de-authorization plan, the USACE established a plan of action for developing the Interim and Final Reports to Congress. Federal, state and local government parties, environmental groups, landowners, navigation interests, other organizations and individuals were invited to assist in preparation of the reports. A series of public stakeholder forums was held which included technical presentations and open discussions on topics including wetlands, navigation, storm protection, and the local economy. Each stakeholder was asked to identify their own plans for de-authorization of the MRGO from the GIWW to the Gulf of Mexico, environmental restoration measures in the vicinity of the MRGO, and hurricane protection components. Several stakeholder groups prepared such plans and presented them to the group.

A public meeting was held on October 18, 2006 at the University of New Orleans and involved an open house where stakeholder groups were offered display space to present their plans. More than 150 people attended the public meeting, which included a formal presentation of the study process and scope from the USACE and an open comment period for public statements from citizens, organizations, and elected officials. Public comments made during this meeting were considered in formulating options for the Interim Report to Congress which was submitted in December 2006.

A public information meeting was held on May 19, 2007 at Nunez Community College in Chalmette, Louisiana. The meeting offered attendees an opportunity to view a series of posters presented by the USACE on the study. In addition, various stakeholders displayed information and interacted with the meeting attendees. More than 100 attendees listened to a formal presentation regarding the alternatives evaluated in detail and the Recommended Plan. Following the presentation, attendees had the opportunity to ask questions. All attendees were made aware of the study schedule and process.

Through the collaborative process some consensus measures emerged that were supported by many of the stakeholders. However, the different stakeholders could not agree on a plan to close or de-authorize the channel. Stakeholder recommendations varied from total closure to a sector gate allowing passage of vessels with a draft of up to 28 feet. Many of the measures from the stakeholder plans were incorporated into the Interim

Report to Congress. Collaborative planning continued after the submittal of the Interim Report to Congress and that approach remains a key component of the preparation of the Final Report to Congress and LEIS. The MRGO Deep-Draft De-Authorization Final Report to Congress will become part of the LACPR Final Report to Congress. (For further description of the proposed stakeholder plans, see Section 4.)

S.8 PLAN FORMULATION

In order to ensure that sound decisions are made, the USACE plan formulation process requires a systematic and repeatable approach. The Economic and Environmental Principles for Water and Related Land Resources Implementation Studies and The Economic and Environmental Guidelines for Water and Related Land Resources Implementation Studies (Planning Guidance Notebook or ER 1105-2-100) describe the USACE study process and requirements. Alternatives were formulated to minimize cost associated with the disposition of the de-authorized project. These alternatives were also evaluated against the following four criteria:

- *Completeness* - the extent to which a given alternative plan provides and accounts for all necessary investments or other actions to ensure the realization of the planned effects.

- *Effectiveness* - the extent to which an alternative plan alleviates the specified problems and achieves the specified opportunities.
- *Efficiency* - the extent to which an alternative plan is the most cost-effective means of alleviating specified problems and realizing the specified opportunities, consistent with protecting the Nation's environment.

- *Acceptability* - the workability and viability of the alternative plan with respect to acceptance by state and local entities and the public and compatibility with existing laws, regulations, and public policies.

S.9 ALTERNATIVES FROM INTERIM REPORT TO CONGRESS

A broad suite of options were identified for development of the deep-draft de-authorization plan in the December 2006 Interim Report to Congress. This initial array of alternatives included:

- Interim Report Alternative 1 – Maintain a shallow-draft MRGO navigation channel with variations such as no structure, a salinity control weir at Bayou La Loutre, a salinity control gate at Bayou La Loutre (normally closed) and a storm protection gate at Bayou La Loutre (normally open).

- Interim Report Alternative 2 – Close the MRGO channel to deep-draft and shallow-draft vessels by: blocking the channel with a total closure structure across the MRGO at Bayou La Loutre; restoring both banks of Bayou La Loutre across the MRGO at Hopedale, Louisiana; or filling in the entire MRGO channel from the GIWW to the Gulf of Mexico.

- Interim Report Alternative 3 – Cease all MRGO operations and maintenance activities (dredging, beneficial use, jetty repairs, and navigation aids).

S.10 ALTERNATIVES ELIMINATED FROM FURTHER STUDY

All of the alternatives identified in the Interim Report to Congress that included maintenance of the MRGO channel for shallow-draft navigation were eliminated from further consideration based on economic analysis. The plan to maintain shallow-draft navigation (and all stated variations) was eliminated because the projected economic return was not positive. The cost to maintain the channel on an annual basis would be much higher than the projected commerce it could generate. Restoring both banks of Bayou La Loutre was eliminated from further consideration because, while it achieves similar environmental and navigation results as putting a total closure structure across one bank, it would cost approximately twice as much to construct. There are also additional negative impacts to recreational and commercial vessel users caused by restricted access to Bayou La Loutre from the north. Filling the entire MRGO channel was eliminated from further consideration due to its high cost and the length of time required for full implementation. It is estimated that it would require approximately 250-350 million cubic yards of dredged material to fill the channel from mile 60 to mile 25 at a cost of about $2.8 billion based on October 2006 price levels, and could take from 15 to 44 years to completely fill the channel.

Other alternatives were suggested after release of the Interim Report to Congress. These included multiple closure locations, limited channel filling, shoreline restoration and stabilization, and vegetative plantings. Alternatives dealing with ecosystem restoration were deemed to be beyond the authority of the MRGO de-authorization study; however, they will be considered under LACPR and other appropriate authorities. In addition to study authority, alternatives were eliminated from further consideration based upon costs, impacts to the environment, limited availability of construction materials, constructability issues, and effectiveness in meeting the study goals and objectives. Alternatives recommended after release of the Interim Report are discussed in greater detail in Section 4 and in Appendix P.

S.11 ALTERNATIVES EVALUATED IN DETAIL

In order to prepare the Final Report to Congress and the Legislative Environmental Impact Statement, in addition to the future without de-authorization three Alternatives were carried into the final array of alternatives for detailed evaluation. The alternatives evaluated in detail are listed below:

- Future Without De-authorization - The channel would be dredged to the Congressionally authorized dimensions of 500-foot bottom width in the Inland and Sound Reaches and a 600-foot bottom width in the Bar Channel. The channel would be maintained at these widths. Dredged material would be used beneficially behind the jetties and on Breton Island.

- Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately;

- Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre (phased construction would begin with a weir and be completed with a total closure structure);

- Alternative 3 – Cease All MRGO Operations and Maintenance Dredging Activities Immediately.

The following features are common to Alternatives 1, 2, and 3:

- The MRGO channel would be de-authorized for navigation from mile 60 at the southern bank of the GIWW to the Gulf of Mexico.

- Aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard.

- Existing bank stabilization features and jetties would be de-authorized, but left in place.

S.12 ALTERNATIVE 2 ELIMINATED FROM FURTHER EVALUATION

Alternative 2 was eliminated from further evaluation based on the comparison of alternatives based on the four criteria in principles and guidelines presented in Section 2.6 and the assessment of planning risk and uncertainty presented in Section 2.5.2. Therefore, Alternative 2 was not carried forward for the evaluation and comparison of environmental consequences presented in Section 3.

Alternative 2 was eliminated from further evaluation because it was deemed to be less complete, effective, and acceptable than Alternative 1 and less efficient than Alternative 3. Additionally, the benefits that may be derived from shallow-draft navigation usage before 2014 under Alternative 2 are speculative in nature because of the planning risk and uncertainty surrounding the potential rate of future MRGO channel shoaling. Given the risk and uncertainty and the performance of the alternative when evaluated against the four criteria in principles and guidelines, Alternative 2 was eliminated from further evaluation.

S.13 EXISTING CONDITIONS

Shoaling in the MRGO channel caused by Hurricane Katrina limited the controlling depth to approximately 22 feet which has restricted deep-draft access. Many deep-draft businesses in the study area were severely impacted. Two companies chose to relocate to Mobile, Alabama. Others are trying to recover; some may plan to relocate. Deep-draft vessels are entering the MRGO light-loaded, calling on tidewater port facilities in New Orleans, and exiting through the IHNC Lock into the Mississippi River for outbound voyages. Some maritime interests have reported modifying operations by moving products over to Mississippi River docks for loading. Other companies have adopted

other modifications to continue commerce. Post-Katrina 230 jobs were lost from the MRGO-IHNC area due to relocation and downsizing. Shallow-draft facilities have essentially recovered. Orleans Parish shows a 34.6% reduction from pre-Katrina jobs and St. Bernard Parish shows a 54.1% reduction.

Traffic records from the Waterborne Commerce Statistics Center (WCSC) show MRGO utilization steadily increasing until reaching a peak in terms of tonnage carried in 1978 and in terms vessel trips in 1982. Both tonnage and total vessels have decreased since that time. Recent analysis of deep-draft navigation indicates that maintaining the authorized dimensions of the MRGO between the GIWW and the Gulf of Mexico is not cost-effective and thus not economically justified. Average annual operations and maintenance (O&M) costs to dredge a single shipping lane in the Inland Reach and authorized width in other reaches are $12.5 million. However, maintaining a single shipping lane, which is half of the authorized dimensions, only produces approximately $3.7 million per year in transportation efficiencies. Efforts to operate and maintain the fully authorized dimensions (i.e. a two-lane channel 500 feet wide by 36 feet deep) would be even more costly and would not produce greater navigation benefits. The economic information available also indicates that it is not cost effective to maintain shallow-draft navigation on the channel between the GIWW and the Gulf of Mexico in terms of National Economic Development (NED) criteria. The total average annual costs to maintain a 12 ft shallow-draft channel are approximately $6 million whereas the estimated average annual benefits are approximately $1.2 million.

Historically, the MRGO has also served as an alternate navigation route for shallow draft vessels during times of extreme congestion at the IHNC Lock or when the lock was inoperable. Before Hurricane Katrina some barge tows would travel downstream on the Mississippi River to Baptiste Collette Bayou, exit Baptiste Collette Bayou into Breton Sound, and then enter the MRGO. Eastbound tows would then travel back inland from Breton Sound on the MRGO to the GIWW Reach before continuing east to locations in Mississippi, Alabama, and Florida (westbound traffic would traverse the opposite route). The alternative route around the IHNC Lock is about 180 miles longer than a direct lock through from the GIWW to the Mississippi River. Vessel operators would weigh factors such as anticipated time of delay, added fuel consumption, weather, and insurance ratings when making a decision to proceed through the alternative route or to wait to pass through the lock. The bypass takes approximately 24 hours to navigate.

Alterations to the Mississippi River have increased salinity in the study area by reducing the flow of freshwater in the region (USACE 2004). Prior to construction of the MRGO, typical tidal flow within the Breton Sound area was reduced as it moved across the marshes and wetlands inward toward Lake Borgne (USACE 2004). The Bayou La Loutre ridge provided a basin boundary that limited the flow of saline water from the Breton Sound area into Lake Borgne (Rounsefell 1964). The MRGO now provides a more direct flow of higher salinity, stratified water inland toward areas of St. Bernard and Orleans Parishes (Wicker, et al. 1981). This stratified water sinks to the bottom of Lake Pontchartrain where it moves with the lake bottom currents and can cover at least 1/6 of the lake's bottom during the spring and summer. This heavy saline water inhibits both

mixing and oxygenation, generally leading to hypoxic (low oxygen) or anoxic (no oxygen) conditions near the lake bottom (Schurtz and St. Pe' 1984).

Between 1956 and 1990, 68,660 acres of wetlands were lost in the study area. Factors such as subsidence, navigation channels, oil and gas exploration and production, development and storms have contributed to these losses. Approximately 67 percent of the swamp in the study area was lost while saline marsh gained 8 percent. Marsh type is dependent on salinity which is generally determined by rainfall and man-induced changes such as channel and canal dredging. The exact locations and acreages of fresh and intermediate marshes in the study area have fluctuated over time, probably depending on rainfall during the year. Intermediate marsh has been present in the Central Wetlands three of the five years it has been mapped. Brackish marsh has decreased significantly in acreage and fluctuated slightly in location. From 1949-1978 saline marsh was only found south of the Bayou La Loutre ridge and in the outer Biloxi Marshes. In 1988 saline marsh had encroached up the MRGO to about Bayou Dupre and into the Biloxi Marshes near the MRGO. By 1997, it was found further north along the MRGO, past Bayou Dupre.

The study area is home to many species of importance to the state and nation. Wintering waterfowl and furbearers have declined in the study area since about 1970, however are still present. After about 1970, 22 species of freshwater fish were apparently no longer found in the Biloxi Marshes/Lake Borgne area. However six important sport fish seemed to be present in approximately the same numbers as prior to about 1970. The MRGO channel, adjacent waters and marshes and Lake Pontchartrain are essential fish habitat (EFH). The hypoxic-anoxic (H-A) zone in Lake Pontchartrain causes a reduction in the benthic community during H-A events. With regard to threatened and endangered (T&E) species, brown pelicans are found in the study area. Beneficial use of dredged material has nourished Breton Island and wintering piping plovers have utilized the island. Sea turtles in agreed-upon numbers have been taken in the Bar Channel. Detailed contract specifications to protect the Gulf sturgeon, manatee and various kinds of sea turtles have been used. Maintenance of the MRGO channel did not adversely affect T&E species.

S.14 FUTURE WITHOUT DE-AUTHORIZATION

The existing MRGO Project completed construction in 1968 at the authorized depth and width. Since construction, the project has been maintained at various depths and widths. For the past few years, the Inland Reach, the Sound Reach and Bar Channel have not been dredged to full dimensions. Rather, the channel has been maintained for one-way traffic only. Due to shoaling the current controlling depth is approximately 22 feet. However, to determine whether it is economically feasible to maintain the project and evaluate the environmental impacts for various levels of maintenance including closure, the future without de-authorization is assumed to be a project maintained at the authorized dimensions. The Future Without condition is equivalent to the no-action alternative. All alternatives will be compared to this future condition.

When the Inland Reach is dredged to its full, authorized dimensions, all material from the Inland Reach would be placed in upland disposal areas because of difficulties in finding

marsh creation sites unencumbered with oyster leases. Based upon previous practices, under the future without project scenario, material from the initial dredging of channel miles 27 to 23 would create approximately 157 acres of wetlands adjacent to and behind the north jetty. Material from the initial dredging of channel miles 23 to 14 would be placed behind the south jetty, creating approximately 1,297 acres of marsh. From channel miles 14 to 3.4, material would be placed at unprotected sites in the sound and it is unlikely that any marsh created would last more than a year because of exposure to open bay waves. Material from the initial dredging of channel miles 3.4 to -4 would be placed on Breton Island to create approximately 215 acres of marsh and barrier island habitat (see Appendix G).

Following the restoration of the channel to its full dimensions, it would be maintained at a 500-foot bottom width for the 50-year period of analysis. A 600-foot bottom width would be maintained within the Bar Channel. However, future maintenance operations would depend on funding availability. Material from the Inland Reach would again be placed in upland confined disposal areas. From 1985 to 2004, while maintaining miles 27 to 3.4 to a 500-foot width, an average of approximately 17 acres was created each year behind the jetties. From 1993 to 2005, material between miles 3.4 to -4 was placed either at the feeder berm or just off Breton Island, creating an average of approximately 21 acres per year. It is assumed that these acreages would continue to be created for 50 years in the future without de-authorization (see Appendix G).

Approximately 2,702 acres of marsh would be created in 50 years. At the same time 5,045 acres of marsh could be lost due to erosion. Thus, the estimated net loss is 2,343 acres over 50 years (see Appendix G).

S.15 EVALUATION AND COMPARISON OF REMAINING ALTERNATIVES

The Future Without De-authorization, Alternative 1 and Alternative 3 were analyzed in Section 3 using comparable information to assess relative consequences to the environment. The impact of each alternative across a range of significant resources is presented in Table 3.10. The following text compares the Future Without De-Authorization, Alternative 1, and Alternative 3 relative to this assessment of environmental impacts. A comparison of total project construction costs and average annual benefits and costs for each alternative are presented in Table 2.4.

Under the Future Without De-authorization, it is anticipated that navigation use would return to pre-Katrina levels; however, it has been determined that this level of navigation use does not economically justify a continued Federal interest in the authorized Project. The Future Without De-authorization also results in net environmental losses. Approximately 2,702 acres of marsh could be created by beneficial use in 50 years, but, about 5,045 acres of marsh could be lost to wake and wave erosion. Thus there could be an estimated net loss of about 2,343 acres of marsh during the 50 year period of analysis. There would be no salinity reduction in the Pontchartrain Basin under the Future Without De-authorization and habitat types would remain as they are today. The "H-A Zone" in Lake Pontchartrain would continue to occur nearly every year. The Future Without De-

authorization has little compatibility with other potential ecosystem restoration efforts, such as a freshwater diversion structure at Violet.

Alternative 1 provides a physical closure to eliminate attempted navigation on the channel after de-authorization and maximizes protection of the environment. In addition, compatible with the study authority (Section 1.2), Alternative 1 has the highest compatibility with other potential ecosystem restoration efforts being considered under LACPR, such as a freshwater diversion structure at Violet. Alternative 1 immediately closes the MRGO to all navigation, thereby eliminating potential through navigation which could occur prior to the channel shoaling in naturally. It yields the fewest average annual net economic benefits ($7.8 million) because all navigation benefits are lost as soon as the total closure structure is installed. Shallow-draft tows that use the MRGO as an alternate route when the IHNC is congested or unexpectedly closed could no longer do so. (Note: this cost is included in calculation of net economic benefits). There is the potential for erosion to increase along the banks of Bayou La Loutre and other waterways if vessels currently using the MRGO channel utilize the other waterways as alternative routes; however, although this is not quantifiable the positive impacts of the alternative far outweigh any impacts to alternative routes. Alternative 1 could prevent a significant percentage of the 2,343 net acres of marsh estimated to be lost over 50 years under the future without condition. Greater salinity reduction and vegetation change to historic habitat types is anticipated to occur over a larger area. It is estimated that there could be a reduction in the size of the "H-A zone" in Lake Pontchartrain. If authorized and funded, Alternative 1 could be built in one construction effort lasting an estimated 170 days.

Alternative 2 was eliminated from further evaluation.

Alternative 3 is the least costly alternative and does not address negative environmental impacts associated with erosion and increased salinity associated with future without de-authorization. It does not provide a physical closure of the channel and therefore through navigation of the channel would be limited only by natural shoaling. Additionally, Alternative 3 is not as compatible with the ecosystem restoration goals of LACPR as Alternative 1. Alternative 3 yields the greatest average annual net economic benefits ($9.1 million) because it requires minimal investment and because shallow-draft navigation benefits would only be limited by natural shoaling within the channel. Alternative 3 has no construction costs, except 1) aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard and 2) the USACE would dispose of some existing disposal and channel easements. This alternative could be implemented almost immediately after Congressional authorization and appropriation. Shallow-draft navigation would be prohibited over time because the channel would not be maintained; however shallow-draft navigation would not be impeded by a structure. Most shallow-draft navigation would be unable to use the Sound Reach of the channel after about 2014. Shallow-draft tows that use the MRGO as an alternative route when the IHNC is congested or unexpectedly closed could no longer do so after about 2014 (Note: this cost is included in the calculation of net economic benefits). It is estimated that slightly more marsh would be lost than under Alternative 1, but significantly less than under the future without condition. It is estimated that Alternative 3 is unlikely to

influence salinity or marsh vegetation types or reduce the "H-A zone" in Lake Pontchartrain. Additionally, potential future ecosystem restoration measures, such as a freshwater diversion structure at Violet, could be more difficult to implement than under Alternative 1. For example, without a structure in the MRGO channel, a much larger freshwater diversion would be required at Violet, which would increase cost significantly and decrease the ability to control desired environmental results within the greater Pontchartrain Basin. Assessment of this alternative also raised questions about whether or not the alternative could be classified as comprehensive and therefore responsive to the Congressional direction.

S.16 RATIONALE FOR SELECTING RECOMMENDED PLAN

Alternative 1 has been selected as the Recommended Plan. The Recommended Plan is consistent with the study authority as described in Public Law 109-234 and explained in House Report 109-494 (see Section 1.2). The Recommended Plan also fulfills the study purpose and need (see Section 1.5) and the study goals and objectives (see Section 1.6) which are derived from the study authority. The Recommended Plan presents a comprehensive plan to de-authorize all navigation on the MRGO channel from the GIWW to the Gulf of Mexico; proposes that navigation function be maintained outside of the GIWW to Gulf of Mexico portion of the channel; proposes plan features; and proposes existing project features to be de-authorized or to remain authorized (see Section 6.1). The Recommended Plan minimized the costs associated with the disposition of the de-authorized project while best meeting the criteria of completeness, effectiveness, efficiency and acceptability. . The Recommended Plan results in $7.8 million in net annual benefits, reduces negative environmental impacts in the study area through reductions in erosion and salinity, and may reduce the size of the "H-A zone" in Lake Pontchartrain. The Recommended Plan was developed in consultation with St. Bernard Parish, the State of Louisiana, and affected Federal Agencies, as well as other stakeholders and the general public (see Section 4). While the Recommended Plan does not propose hurricane or storm damage reduction features, the Recommended Plan was identified because it is more compatible with the goals of LACPR than Alternative 3. The Recommended Plan is acceptable, complete and effective as evaluated under the P&G criteria. Although the plan is not the least cost alternative, it is recommended because it fully meets three of the four P&G criteria while the cost alternative only fulfills the efficiency criteria. Additionally, the Recommended Plan is consistent with all of the alternatives being evaluated under LACPR and can be fully integrated into any of the LACPR plans under consideration. The Recommended Plan provides for reduced salinities in areas targeted for restoration under LACPR, LCA, CWPPRA, as well as, restoration efforts of other Federal and State agencies. Reduction in salinities will improve the effectiveness of, and likely reduce the cost of, ecosystem restoration measures planned for these areas. The MRGO Final Report and LEIS will be included in the LACPR Final Report. Specific features of the Recommended Plan are addressed in Section 6.

S.17 DESCRIPTION OF THE RECOMMENDED PLAN

The project delivery team has developed detailed design and cost information for the recommended plan. Cost information presented for the Recommended Plan is based on

advanced design and therefore differs from the costs presented for Alternative 1 which were based on preliminary design information. Advanced design information has been generated through the analysis of field engineering data recently collected at the proposed closure structure location. Field data includes bathymetric surveys and subsurface geotechnical borings. Engineering analysis of the information was used to developed design and cost information to a feasibility level of detail. This level of information was developed only for the recommended plan not the entire array of alternatives. This section of the report provides the feasibility level design and cost information. The team has not updated information in earlier parts of the report because the added information does not change plan selection. This assessment is based upon the initial screening of navigation alternatives and subsequent assessment that remaining alternatives involving rock would change proportionally with the recommended plan.

Under the Recommended Plan, that portion of the MRGO channel from mile 60 at the southern bank of the GIWW to the Gulf of Mexico would be de-authorized for all navigation use. The MRGO channel (mile 66 – 60), the Michoud Canal Project, and the IHNC Lock Replacement Project would remain authorized. As part of the Plan, a total closure structure would be built of rock downstream of the south ridge of Bayou La Loutre in St. Bernard Parish, Louisiana (see Figure S.3). The structure would connect the two sides of the ridge, a distance of approximately 950 feet. The top width of the structure would be 12 feet and the elevation would be + 7 feet NAVD 88. Following completion of construction, the elevation of the structure will not be less than +4 feet NAVD 88. The side slopes of the structure would be 1 V to 2 H and the bottom width would be 450 feet. Quarry run "A" stone would be used to increase fines in the mix and minimize voids and water exchange. The structure would cover nearly 10 acres of water bottoms. Overbank extensions would be necessary on either side of the structure to constrict flow during high water events and prevent flanking of the channel closure. These overbank tie-ins would be approximately 50 feet wide and 7 feet high and extend inshore approximately 150 feet on the south bank and approximately 250 feet on the north bank. Construction of these overbank extensions will impact 0.5 acres of marsh on the north bank and 0.3 acres of scrub shrub on the south bank. Approximately 391,500 tons of stone would be used. A barge-mounted dragline would be used to place the rock. Every effort would be made to construct the total closure structure during the May through September window when Gulf sturgeon are in the rivers and not the estuaries.

The Federal government would construct the total closure structure. Navigation aids and channel markers would be considered for removal at the discretion of the United States Coast Guard. Existing bank stabilization features and jetties would be de-authorized but remain in place. Maintenance of the existing bank stabilization features and possible reapplication or realignment of the jetties could be investigated under LACPR or other appropriate authorities. Disposal easements and perpetual channel easements not required for continued operation and maintenance of authorized segments of the MRGO Project would be released. Other property not required for continued operation and maintenance of authorized segments of the MRGO Project would be disposed of in accordance with the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. § 471 et seq. A non-Federal sponsor would be required to acquire

any real estate necessary to implement the Recommended Plan and for operation, maintenance, repair, rehabilitation, and replacement (OMRR&R) of the total closure structure. In addition, the non-Federal Sponsor would be required to hold and save the Government free from all damages arising from the construction, operation, maintenance, repair and replacement of the total closure structure, except for damages due to the fault or negligence of the Government or its contractors.

The construction costs of the total closure structure would be 100% Federal (except real estate) and the OMRR&R costs of the total closure structure would be 100% non-Federal. The estimated total project construction cost of the rock total closure structure is $24,684,150 based on October 2006 price levels. Total average annual costs for the Recommended Plan (including OMRR&R costs and the costs to navigation) are estimated to be approximately $5.1 million and total average annual benefits are estimated to be $12.5 million (savings derived from not dredging the authorized channel). This results in an estimated total average annual net benefit of $7.4 million. Estimated construction costs, annual costs and benefits, and Federal/non-Federal cost breakdown are presented in Tables S.1 through S.4. Costs presented in these tables are based on advanced design of the Recommended Plan.

Additionally, the Recommended Plan contemplates that measures undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 in Title II, Chapter 3 of Public Law 109-234 will be implemented conditioned on the non-Federal sponsor for those measures assuming responsibility of OMRR&R of those measures at 100% non-Federal cost.

Table S.1 Project First Costs

Project First Costs
MRGO Deep-Draft De-authorization Study
Closure Structure
(October 2006 Price Levels;
Based on Advanced Design of Recommended Plan)

Construction Items	Cost ($)
Mobilization and Demobilization	85,000
Stone Placement - Channel Proper	11,773,000
Stone Placement - Overbank Tie-Ins	403,650
Crushed Stone Blanket	3,400,000
Geotextile Separator Fabric	31,500
Clearing and Grubbing (Overbank)	11,000
Engineering and Design	863,700
Construction Management	1,256,300
Real Estate*	1,401,000
Removal of Aids to Navigation	700,000
Contingencies	4,759,000
Total Project Construction Costs	**24,684,150**

*****Of the total Real Estate costs, $21,000 are associated with acquisition of real estate rights necessary for the construction of the closure structure. For an explanation of additional costs, see Appendix E.

Table S.2 Equivalent Annual Benefits and Costs

Equivalent Annual Benefits And Costs
MRGO Deep-Draft De-Authorization Study
Closure Structure
(October 2006 Price Level, 50-Year Period of Analysis, 4.875 Percent Discount Rate,
Based on Advanced Design of Recommended Plan)

Investment Costs:		
Total Project Construction Costs	$24,684,150	
Interest During Construction	452,000	
Total Investment Cost	$25,136,150	
Average Annual Costs:		
Interest and Amortization of Initial Investment	$ 1,264,000	
Deep-Draft Transportation Cost	2,500,000	
Shallow-Draft Transportation Cost	1,200,000	
OMRR&R	172,000	
Total Average Annual Costs	$5,136,000	
Average Annual Benefits	$12,500,000	
Net Annual Benefits	$ 7,364,000	
Benefit-Cost Ratio		2.4 to 1
Benefit-Cost Ratio (computed at 7%)*		2.3 to 1

*Per Executive Order 12893

Table S.3 Economic Costs and Benefits of Recommended Plan

MRGO Deep-Draft De-Authorization Study
Economic Costs And Benefits of Recommended Plan
(October 2006 Price Level, 50-Year Period of Analysis, 4.875 Percent Discount Rate, Based on Advanced Design of Recommended Plan)

Item	Navigation		Total Costs	
	Allocated Costs	Benefits	Allocated Costs	Benefits
Investment Costs:				
Total Project Construction Costs	$24,684,150		$24,684,150	
Interest During Construction	452,000		452,000	
Total Investment Cost	$ 25,136,150		$ 25,136,150	
Average Annual Costs:				
Interest and Amortization of Initial Investment	$1,264,000		$1,264,000	
Deep-Draft Transportation Cost	2,500,000		2,500,000	
Shallow-Draft Transportation Cost	1,200,000		1,200,000	
OMRR&R	172,000		172,000	
Total Average Annual Costs	$ 5,136,000		$ 5,136,000	
Average Annual Benefits		$ 12,500,000		$ 12,500,000
Net Annual Benefits		$ 7,364,000		$ 7,364,000
Benefit-Cost Ratio		2.4 to 1		2.4 to 1
Benefit-Cost Ratio (computed at 7%)*		2.3 to 1		2.3 to 1

*Per Executive Order 12893

S.18 ISSUES TO BE RESOLVED

Implementing the Recommended Plan would result in the abandonment of channel features constructed for purposes of shoreline protection, levee protection, and channel protection. These features include jetties in the offshore segments of the channel in Breton and Chandeleur Sounds, and foreshore protection segments along the portion of the Chalmette Loop Levee fronting the MRGO, and foreshore protection in various locations on the north bank of the channel fronting wetlands areas. Due to geologic conditions and the elimination of maintenance authority, these features are predicted to subside below the water line resulting in diminished functional performance against wave energies.

Table S.4 Federal and Non-Federal Cost Breakdown

MRGO Deep-Draft De-Authorization Study Federal and Non-Federal Cost Breakdown (October 2006 Price Level, 50-Year Period of Analysis, Based on Advanced Design of Recommended Plan)				
	Responsibility	**Federal**	**Non-Federal**	**Total**
Project First Costs (Construction)				
Mobilization and Demobilization	100% Federal	$85,000		$85,000
Stone Placement - Channel Proper	100% Federal	$11,773,000		$11,773,000
Stone Placement - Overbank Tie-Ins	100% Federal	$403,650		$403,650
Crushed Stone Blanket	100% Federal	$3,400,000	-	$3,400,000
Geotextile Separator Fabric	100% Federal	$31,500	-	$31,500
Clearing and Grubbing (Overbank)	100% Federal	$11,000		$11,000
Engineering and Design	100% Federal	$863,700		$863,700
Construction Management	100% Federal	$1,256,300		$1,256,300
Real Estate*	100% Non-Federal	$125,000	$1,276,000	$1,401,000
Removal of Aids to Navigation	100% Federal	$700,000		$700,000
Contingencies	100% Federal	$4,759,000		$4,759,000
Total Project First Costs		**$23,408,150**	**$1,276,000**	**$24,684,150**
OMRR&R	100% Non-Federal		**$7,860,000**	**$7,860,000**
Total Cost Share		**$23,408,150**	**$9,136,000**	**$32,544,150**

*****Of the total Real Estate costs, $21,000 are associated with acquisition of real estate rights necessary for the construction of the closure structure. For an explanation of additional costs, see Appendix E.

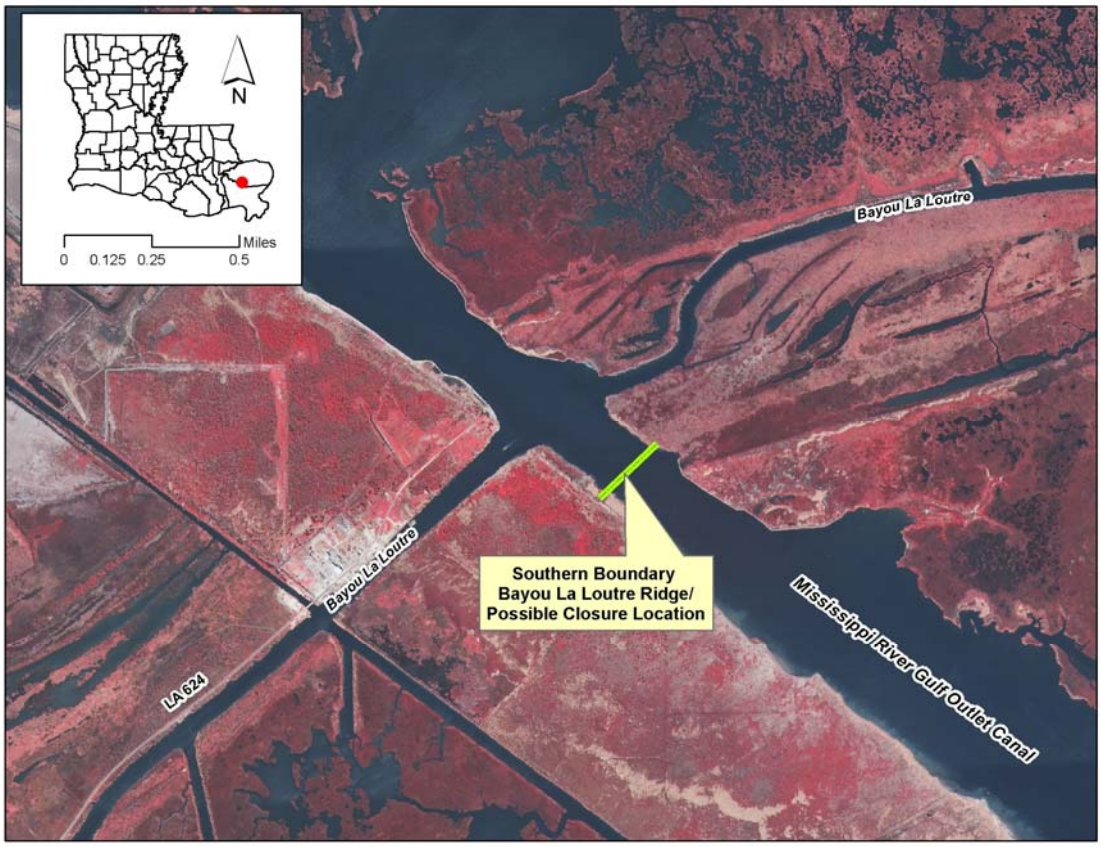
S.19 AREAS OF CONCERN AND CONTROVERSY

Construction of the MRGO Project resulted in the conversion of marsh, wetland forest and shallow open water habitat (USACE 1999). Erosion causes additional acres to be lost each year along the MRGO channel (USACE 2004). Citizens are concerned about coastal erosion, populations of wildlife and fisheries, and increased salinity in area water bodies. Many members of the public also feel that the loss of wetlands exacerbated the flooding of St. Bernard Parish during Hurricane Katrina.

Many citizens of Orleans and St. Bernard Parishes firmly believe that the Inland Reach of the MRGO serves as a storm surge pathway during hurricanes. A number of reports concluded that the Inland Reach of the MRGO contributes very little to flooding when the surrounding marshes are inundated. Reports also indicate that to prevent storm sure in Lake Borgne from reaching the IHNC or GIWW Reach of the MRGO, flow through the GIWW Reach of the channel must be dramatically reduced or eliminated. The USACE is actively planning, designing and building numerous upgrades and new system components to increase the level of hurricane protection for the entire area. The connectivity between Lake Borgne and the GIWW Reach of the MRGO and IHNC is being addressed through efforts to provide comprehensive hurricane and storm protection through the Lake Pontchartrain and Vicinity Hurricane Protection project 100-year

protection effort. See Section 1.8 and Appendix D for further discussions on the MRGO and storm surge.

Figure S.3 Bayou La Loutre Ridge, site of the Total Closure Structure



Stakeholders in the navigation industry have expressed concerns that when the MRGO is de-authorized from the GIWW to the Gulf of Mexico, shallow-draft vessels would no longer be able to use the channel as an alternate route when the Inner Harbor Navigation Canal Lock is congested or inoperable. Industry members believe this could present a serious problem for fuel transport and movement of other vital commodities. In evaluating this concern the USACE determined that although this potential event would be very rare, it nonetheless warrants attention and efforts to avoid such a scenario. However, based upon the economics evaluation of this study, expenditures to construct and maintain a shallow-draft feature for MRGO traffic are not justified. As such, the USACE, navigation industry representatives, and leaders from St. Bernard Parish are willing to work together to identify suitable alternative routes to alleviate this potential issue.

Stakeholders in the shallow draft navigation industry have expressed concern that prolonged closure of the Inner Navigation Canal Association (IHNC) Lock with no alternate route available will cause significant income and employment impacts to businesses that rely on shipments traversing the IHNC Lock and that these impacts were

ignored in economic evaluations. However, as specified in USACE guidelines, effects on income levels and employment levels generally fall into the Regional Economic Development (RED) account. These effects are considered to be RED in nature because, 1) increases or decreases in income/employment levels in one region will tend to be offset by increases or decreases in income/employment levels in another region resulting in a minimal net effect to the nation, and, 2) losses in one region that are not captured by another region can often be made up at a later date in the initially impacted region. This is not to say that the income/employment impacts can not be National Economic Development (NED) in nature, or that the impacts are insignificant at a regional level, but that from a national perspective the net impacts are likely to be small. Given that this is the case and that NED impacts take priority over RED impacts, the economic evaluation performed for the MRGO De-Authorization Study chose not to quantify the income/employment implications of the various plans.

Some groups are concerned that the replacement of the IHNC Lock is somehow directly connected to the de-authorization of MRGO to deep-draft navigation. Although these projects are related, the Recommended Plan is in no way dependent on the replacement of the lock or vice versa.

Some vessels may choose to utilize Bayou La Loutre, a federally-authorized channel, to access Chandeleur Sound and numerous waterways in the Biloxi Marshes following installation of a total closure structure on the MRGO channel. Bayou La Loutre has a controlling depth of six feet limiting vessels to recreational and commercial fishing boats, small tugs and barges, and oil field service boats. Although the potential number of vessels that would use Bayou La Loutre and the potential impacts of diverted vessel traffic along the waterway cannot be quantified at this time, the overall environmental benefits of the Recommended Plan will far outweigh any potential impacts to Bayou La Loutre. Vessel traffic and shoreline erosion rates are monitored along Bayou La Loutre and other Louisiana waterways under private, state, and Federal efforts to implement coastal restoration plans.

This investigation was conducted using a collaborative approach that included multiple stakeholder groups and the general public. A number of plan options, issues, and concerns were raised during study meetings with stakeholders. In addition, during preparation of the final study report the Corps of Engineers opened a 45-day public comment period as part of its compliance with the National Environmental Policy Act. All of the comments received during that period have been addressed. However, an issue of regional significance, the interconnection of the MRGO with other vital waterways in southeast Louisiana, remained unresolved in the Tentatively Selected Plan.

The waterways of southeast Louisiana form a maritime transportation network facilitating the efficient shipment of goods and materials and linking interdependent industries. The Inner Harbor Navigation Canal is a key transition point within this system allowing east-west traffic on the GIWW to cross the Mississippi River and allowing maritime access to points north along the Industrial Canal and into Lake Pontchartrain and points east and southeast on the MRGO. The IHNC Lock was constructed in the 1920's and has been

authorized for replacement to better accommodate modern maritime traffic. Options to implement the lock replacement are currently being developed in a Supplemental Environmental Impact Statement. Occasionally the lock experiences multi-day delays associated with high use and more rarely the lock is closed to vessel traffic for prolonged maintenance. In the event of delay or closure, the MRGO currently serves as an important link in an alternative route enabling traffic to by-pass the IHNC Lock and continue to points along the GIWW in Louisiana and neighboring states across the Gulf coast. The route is especially important for the movement of fuel, energy, and chemical products. In the days following Hurricane Katrina, the MRGO alternative route played an important role in enabling GIWW traffic to by-pass the closed IHNC Lock and the MRGO provided emergency access to severely damaged areas in and around New Orleans on the east bank of the Mississippi River. However, the economic evaluation of deep draft and shallow draft commerce found no National Economic justification for continued Federal investment in an MRGO navigation channel.

Working with stakeholders the study team identified four alternative by-pass routes around the IHNC Lock that would not involve a fully open MRGO channel. In addition, the team identified an emergency plan that would allow temporary removal of the MRGO rock closure to allow vessel passage. However, none of the identified routes or options has been endorsed by navigation industry users. Varying reasons have been identified such as added travel time and expense and concerns about navigation safety raised by the U.S. Coast Guard. The routes deemed unsafe for navigation and those requiring new authority for construction dredging are not being pursued. Still, a long distance by-pass using the Mississippi-Ohio-Tennessee-Tombigbee route remains viable although obviously much less efficient. We recognize these concerns and have identified another option to reduce some of the risks associated with the recommended MRGO channel closure plan. This approach could entail sequencing a series of IHNC Lock maintenance works to be completed prior to implementing the MRGO closure project. Addressing these maintenance needs could improve the reliability of the IHNC Lock reducing the risks to the efficient operation of the waterborne transportation network.

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*Indicates traditional NEPA required sections.

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Appendices

SECTION 1 INTRODUCTION

1.1. FINAL REPORT TO CONGRESS AND LEGISLATIVE ENVIRONMENTAL IMPACT STATEMENT

This Final Report to Congress and Legislative Environmental Impact Statement (LEIS) present the findings of a congressionally requested study on the de-authorization of deep-draft navigation on the Mississippi River-Gulf Outlet (MRGO) between the Gulf Intracoastal Waterway (GIWW) and the Gulf of Mexico. This document provides comprehensive documentation of the MRGO Deep-Draft De-authorization Study. Traditionally, a Report to Congress and LEIS would be produced as two separately bound documents. However, a single integrated document meets the requirements of the National Environmental Policy Act (NEPA) and the USACE decision-making process without duplication. The main table of contents includes asterisks for traditional NEPA required chapters and sections to allow ready access for those specifically interested in the NEPA compliance review.

The report organization and contents are intended to allow the reader to become familiar with the history of the MRGO Deep-Draft De-authorization Study. The information provided includes study purpose, background, and decision process. The document also describes the direct, indirect, and cumulative environmental effects attributable to alternative plans. Public involvement and agency coordination efforts are documented, as well as technical analyses. The document concludes with a detailed description of the Recommended Plan, which is to construct a total closure structure across the MRGO near Bayou La Loutre in one construction effort.

A Legislative Environmental Impact Statement (LEIS) is the detailed statement required by Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2)(C), to be included in a recommendation or report on a legislative proposal to the Congress. Preparation of a LEIS must conform to the requirements of the NEPA implementing regulations, codified at 40 CFR pts. 1500-1508, except that (1) there need not be a scoping process; and (2) the LEIS shall be prepared in the same manner as a draft statement, but shall be considered the "detailed statement" required by statute, 40 CFR § 1506.8(b).

1.2 STUDY AUTHORITY

The U.S. Congress has directed the Secretary of the Army, acting through the Chief of Engineers, to develop a plan for de-authorization of deep-draft navigation for the Mississippi River-Gulf Outlet (MRGO) from the Gulf of Mexico to the Gulf Intracoastal Waterway (GIWW). The Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (Public Law 109-234), reads in part:

> *"…the Secretary of the Army, acting through the Chief of Engineers, utilizing $3,300,000 of the funds provided herein shall develop a comprehensive plan, at full Federal expense, to de-authorize deep-draft*

navigation on the Mississippi River-Gulf Outlet, Louisiana, extending from the Gulf of Mexico to the Gulf Intracoastal Waterway: Provided further, That, not later than 6 months after the date of enactment of this Act, the Secretary shall submit an interim report to Congress comprising the plan: Provided further, That the Secretary shall refine the plan, if necessary, to be fully consistent, integrated, and included in the final report to be issued in December 2007 for the Louisiana Coastal Protection and Restoration Plan."

House Report 109-494 provides a Congressional conference committee manager's statement accompanying the legislative language further directing that:

"The plan shall include recommended modifications to the existing authorized current use of the Outlet, including what navigation functions, if any, should be maintained and any measures for hurricane and storm protection. The plan shall be developed in consultation with St. Bernard Parish, the State of Louisiana, and affected Federal Agencies."

Congressional direction to prepare a deep-draft de-authorization plan for the MRGO also requires that the plan be fully consistent and integrated with the Louisiana Coastal Protection and Restoration (LACPR) plan. Development of the LACPR plan focuses on identifying a comprehensive plan for flood control, coastal restoration, and hurricane protection in south Louisiana. The future of the MRGO navigation channel is a key decision that affects directions on related projects in the area such as hurricane protection, ecosystem restoration, and navigation. Resolving questions about the future depth and use of the MRGO channel could provide a baseline for developing plans and designs for other related projects. The MRGO de-authorization plan is being integrated into ongoing work to develop and evaluate measures for the LACPR plan. Specific work to integrate the components of the MRGO plan with the LACPR plan includes storm surge modeling, environmental planning, and prioritization. Every effort has been made to accelerate completion of the MRGO Final Report and LEIS in accordance with the Congressional direction found in Title IV, Chapter 3, Section 4304 of the "U.S. Troop Readiness, Veterans' Care, Katrina Recovery, and Iraq Accountability Appropriations Act, 2007" (Public Law 110-28). The MRGO Final Report and LEIS will be transmitted to the Congress as soon as is practicable. The MRGO Final Report and LEIS will also be included in the LACPR Final Report.

At the time this report was being released for State and Agency review, the Water Resources Development Act of 2007 (WRDA 2007) became law expanding the scope of the study authority provided by Public Law 109-234 to include ecosystem restoration. In addition, pursuant to WRDA 2007 Section 7013, upon submission of the final report to Congress, the MRGO from the Gulf of Mexico to Mile 60 at the southern bank of the GIWW is no longer authorized. Section 7013 also authorizes the Secretary of the Army to carry out a plan to close the MRGO and to restore and protect the ecosystem substantially in accordance with the final report subject to the Secretary's determination that the plan is cost-effective, environmentally acceptable, and technically feasible. This

report preliminarily addresses the ecosystem restoration requirements of WRDA 2007; however, a supplemental report to completely address the ecosystem restoration requirements of WRDA 2007 will be submitted at a later date.

WRDA 2007 Section 7013 is provided below in its entirety:

SEC. 7013. MISSISSIPPI RIVER-GULF OUTLET.

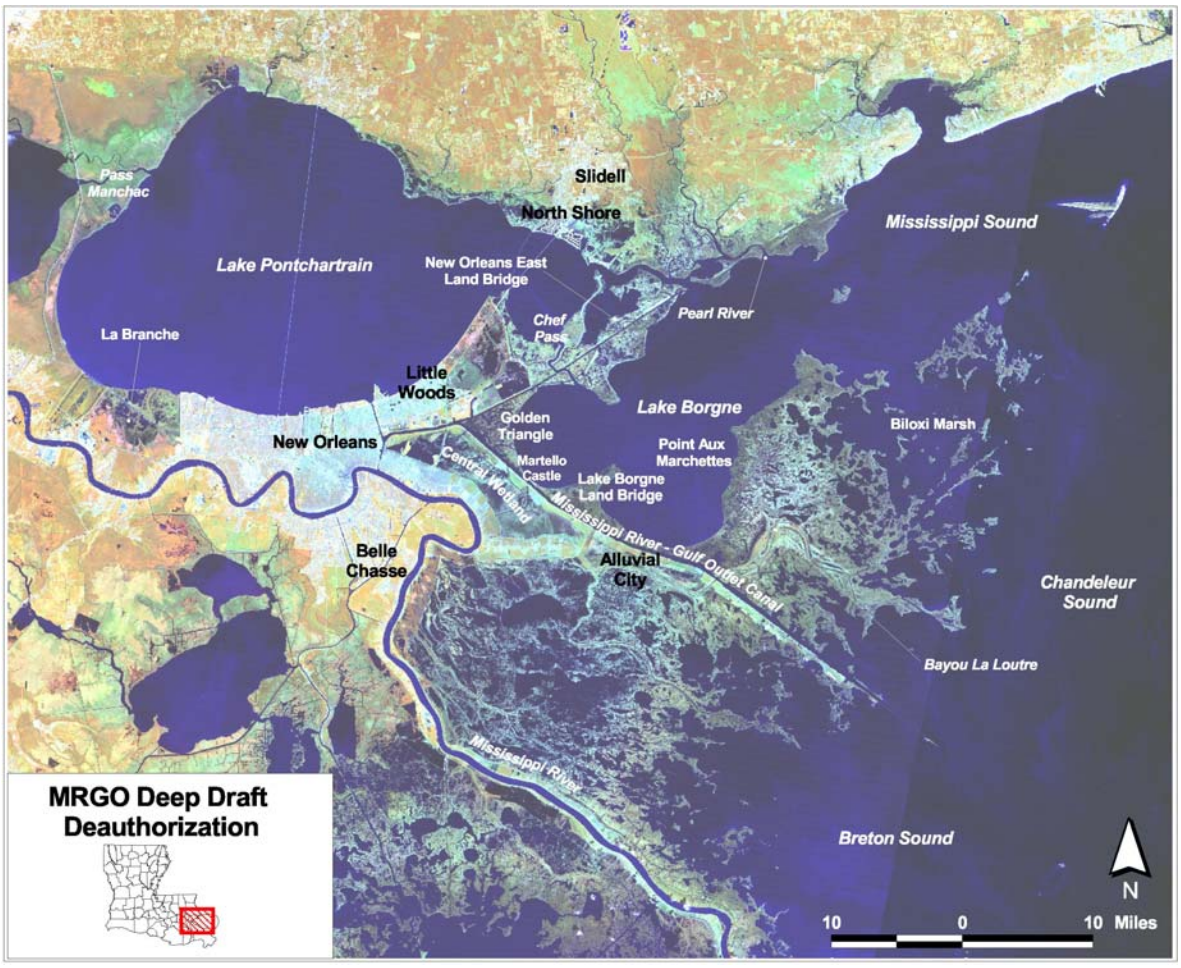
(a) DEAUTHORIZATION.—
(1) IN GENERAL.—Effective beginning on the date of submission of the plan required under paragraph (3), the navigation channel portion of the Mississippi River-Gulf Outlet element of the project for navigation, Mississippi River, Baton Rouge to the Gulf of Mexico, authorized by the Act entitled ‘‘An Act to authorize construction of the Mississippi River-Gulf outlet’’, approved March 29, 1956 (70 Stat. 65) and modified by section 844 of the Water Resources Development Act of 1986 (100 Stat. 4177) and section 326 of the Water Resources Development Act of 1996 (110 Stat. 3717), which extends from the Gulf of Mexico to Mile 60 at the southern bank of the Gulf Intracoastal Waterway, is not authorized.
(2) SCOPE.—Nothing in this paragraph modifies or deauthorizes the Inner Harbor navigation canal replacement project authorized by that Act of March 29, 1956.
(3) CLOSURE AND RESTORATION PLAN.—
(A) IN GENERAL.—Not later than 180 days after the date of enactment of this Act, the Secretary shall submit to the Committee on Environment and Public Works of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives a final report on the deauthorization of the Mississippi River-Gulf outlet, as described under the heading ‘‘INVESTIGATIONS’’ under chapter 3 of title II of the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (120 Stat. 453).
(B) INCLUSIONS.—At a minimum, the report under subparagraph (A) shall include—
(i) a plan to physically modify the Mississippi River-Gulf Outlet and restore the areas affected by the navigation channel;
(ii) a plan to restore natural features of the ecosystem that will reduce or prevent damage from storm surge;
(iii) a plan to prevent the intrusion of saltwater into the waterway;
(iv) efforts to integrate the recommendations of the report with the program authorized under section 7003 and the analysis and design authorized by title I of the Energy and Water Development Appropriations Act, 2006 (119 Stat. 2247); and
(v) consideration of—
(I) use of native vegetation; and
(II) diversions of fresh water to restore the Lake Borgne ecosystem.
(4) CONSTRUCTION.—The Secretary shall carry out a plan to close the Mississippi River-Gulf Outlet and restore and protect the ecosystem substantially

in accordance with the plan required under paragraph (3), if the Secretary determines that the project is cost-effective, environmentally acceptable, and technically feasible.

1.3 PROJECT AREA DESCRIPTION

The project area is located in southeastern Louisiana in St. Bernard, Orleans, Jefferson, St. Tammany, St. Charles, St. John the Baptist and Tangipahoa Parishes. It covers the Middle and Lower Pontchartrain Basin. The Middle Basin consists of Lake Pontchartrain with its adjacent cities and towns and surrounding wetlands. The Lower Basin consists of Lake Borgne, MRGO, Chandeleur and Breton Sounds and the surrounding wetlands. (Figure 1.1)

Figure 1.1 Project Area



Southeast Louisiana contains numerous waterways that are important for domestic and international commerce. The Mississippi River is the dominant route in a complex interconnected system. Five ports are located on the Mississippi River between New Orleans and Baton Rouge. These facilities handle inland traffic bringing products from interior states for export. International vessels pick up and deliver goods, materials, and

passengers. The Mississippi River is connected to other waterways through locks at Harvey Canal, Algiers, and the Industrial Canal. These locks provide transit points for traffic movements on the GIWW. In addition, the lock at the Industrial Canal connects to the MRGO deep-draft channel, the shallow-draft GIWW, and into Lake Pontchartrain. Another connection is available near the mouth of the Mississippi River at Baptiste Collette Bayou which provides a link to the MRGO across Breton Sound (see Figure 1.2).

1.4 BACKGROUND ON THE MRGO

The MRGO provides a shorter navigation route from the Gulf of Mexico to the Port of New Orleans tidewater facilities compared to using the Mississippi River to access the port. Construction of the MRGO channel began in 1958 and was completed in 1968. The channel extends from the Inner Harbor Navigation Canal (IHNC) in New Orleans to the 38-foot depth contour in the Gulf of Mexico (see Figure 1.2). The stretch contiguous with the GIWW is the called the GIWW Reach (mile 66-60). Where the channel diverts from the GIWW and runs through wetlands for 37 miles is known as the Inland Reach (mile 60-23). The 23 miles through Breton and Chandeleur Sounds is called the Sound Reach (mile 23-0). The portion in the Gulf of Mexico is the Bar Channel (mile 0 to -9.4). All reaches of the MRGO navigation channel are authorized as a 36-foot deep, 500-foot bottom width waterway with the exception of the Bar Channel which is authorized as a 38-foot deep, 600-foot bottom width waterway.

MRGO channel construction was authorized by a March 29, 1956 Act of Congress (Public Law 84-455) as a modification to the existing project for Mississippi River, Baton Rouge to the Gulf of Mexico. The Act authorized construction of the MRGO Project substantially in accordance with the recommendation of the Chief of Engineers contained in House Document No. 245, 82nd Congress. In addition to recommending construction of the channel, the Chief of Engineers recommended the construction of (1) protective jetties at the entrance to the channel from the Gulf of Mexico; (2) a permanent retention dike through Chandeleur Sound and a wing dike along the islands as required; (3) a turning basin with a project depth of 36 feet Mean Low Gulf (MLG), a width of 1,000-feet and a length of 2,000 feet at the junction of the new channel and the Inner Harbor Navigation Canal; and (4) a highway bridge with approaches to carry Louisiana State Highway 61 over the channel. All of these features were constructed, with the exception of the permanent retention dike through Chandeleur Sound and the wing dike along the islands.

Public Law 84-455 also authorized replacement of the existing IHNC Lock when economically justified. In 1968, the River and Harbor Act (Public Law 90-483) authorized the Michoud Canal Project as a modification of the MRGO Project. The Michoud Canal Project authorized a deep-draft navigation channel in the GIWW and Michoud Canal by enlargement to a depth of 36 feet over a bottom width of 250 feet from the MRGO channel to and including a turning basin 800 feet square at the north end of the Michoud Canal. The Michoud Canal Project was constructed; however, the IHNC Lock has not yet been replaced.

The Federal government is responsible for constructing, operating, and maintaining all features of the MRGO Project, including the Michoud Canal Project, with the exception of the highway bridge and its approaches, which is owned, operated, and maintained by non-Federal entities. The Port of New Orleans, the non-Federal project sponsor, is responsible for furnishing free of cost to the Federal government all lands, easements, rights-of-way, relocations, and disposal areas (LERRDs) required for construction and maintenance of the MRGO Project.

When the MRGO Project was built approximately 3,150 acres of marsh, 100 acres of wetland forest and 830 acres of shallow open water were converted to the deep water navigation channel between the GIWW and the Gulf of Mexico. The dredge material from channel construction was placed in a disposal area that was about 4,000 feet wide in most places and immediately southwest of the channel. The material in this disposal area was piled about 10 feet high and covered about 12,440 acres of marsh, 1,410 acres of wetland forest and 3,920 acres of shallow open water (USACE 1999).

It is estimated that habitat shifts caused by saline waters brought in by the MRGO might have caused the following in areas adjacent to the MRGO: 3,350 acres of fresh/intermediate marsh and 8,000 acres of cypress swamp converted to brackish marsh and 19,170 acres of brackish marsh and swamp became saline marsh (USACE 1999). Bank erosion along the MRGO has been estimated to occur at rates of between 27 and 38 feet per year on the Inland Reach (USACE 2004). Between 1964 and 1996, 5,324 acres of marsh have been lost adjacent to the MRGO channel (mile 66 to 21).

Operation and maintenance of the MRGO channel has required the construction of additional project features. Bank stabilization measures, also called foreshore protection, have been constructed along several reaches of both the north and south banks of the GIWW and Inland Reaches to prevent sloughing of the bank into the channel and to protect adjacent wetlands and levees. Bank stabilization measures exist in the following locations: 1) MRGO north bank (Miles 66-60, Miles 56 - 50.5, Miles 43 – 41, Miles 37.2 - 36.5, Miles 36.1 - 35.6, Miles 33.8 - 32.6), and 2) MRGO south bank (Miles 66-60, Miles 60 - 47, Articulated Concrete Mattress (ACM) Miles 38.9 - 38.5 and 37.3 to 36.5). In addition, Miles 23.2 to 20.8 of the north and south jetties provide foreshore protection for adjacent wetlands.

Figure 1.2 Mississippi River-Gulf Outlet Area.

Many disposal sites have been designated for maintenance of the MRGO Project. These include numerous upland disposal sites and beneficial use sites for wetlands restoration and nourishment. Dredged material was used beneficially from 1985 to 2003. An average of about 16 acres per year was created in the Inland Reach. Shallow open water areas on the north and south side of the jetties have been used for the placement of dredged material in a manner conducive to wetland creation. An average of about 17 acres per year was created behind the jetties. Dredged material has also been placed at an offshore feeder berm to nourish Breton Island and in shallow open water immediately adjacent to Breton Island to restore barrier island habitat destroyed by erosion and storms. About 21 acres per year was created on Breton Island. In the area behind the south jetty, LDNR has required disposal to be placed as point sources in an effort to create marsh. LDNR has also requested that point disposal areas be used at two-mile intervals across Breton Sound to attempt to create islands. These areas have been used, but no islands have been created. There is also an approximately 5,000 acre EPA-designated Ocean Dredged Material Disposal Site (ODMDS) located parallel to and south of the channel from mile 4 to mile -10. Only the portion from mile -4 to mile -10 has been recently used for disposal.

The MRGO Project features which have been discussed in the paragraphs above are illustrated on Figures 1.3, 1.4, 1.5 and 1.6.

Direct costs of construction, operation, and maintenance of the MRGO have been funded by the Federal government. These direct costs have totaled over $580 million since 1958.
The average annual operations and maintenance expenditures for the MRGO were $12.5 million (in 2000 dollars). However, following tropical storms and hurricanes, supplemental expenditures have often been required to return the MRGO to the authorized dimensions. Since 1998, the $12.5 million has not allowed for dredging of the channel to its full-authorized dimensions. The GIWW Reach has not been dredged since 1998. From 1998 to 2005, the Inland Reach was maintained to a minimum 300-foot bottom width; the Sound Reach to a minimum 450-foot bottom width; and the Bar Channel to a minimum 500-foot bottom width. There has been no channel maintenance dredging in any reach of the MRGO since Hurricane Katrina in 2005.

Sections of the MRGO experienced severe shoaling during Hurricane Katrina, leading to a current controlling channel depth of approximately 22 feet. The estimated cost to return the channel to authorized dimensions (36 feet deep by 500 foot bottom width; 38 feet deep by 600 foot bottom width in Bar Channel) is $130,444,870 based on October 2006 price levels. However, as discussed previously, for the past several years prior to Hurricane Katrina the channel has been maintained to reduced dimensions in some reaches. The estimated cost to return the channel to 36 feet deep by 300 foot bottom width in all reaches is $62,380,000 based on October 2006 price levels. For this de-authorization study, although no current plans exist to dredge the MRGO, it is important to estimate these costs for comparison purposes in evaluating future alternatives for modifying the channel.

After Hurricane Katrina, the U.S. Congress passed two laws providing funds for emergency repairs or authorizing other actions related to the MRGO navigation channel. Chapter 3, under Division B of Title I of the Department of Defense, Emergency Supplemental Appropriations to Address Hurricanes in the Gulf of Mexico, and Pandemic Influenza Act, 2006 (Public Law 109-148) provided $75,000,000 for operation and maintenance (O&M) activities along the MRGO. Section 2304 of Chapter 3 in Title II of the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (Public Law 109-234) clarified that these funds were to be used for "the repair, construction or provision of measures or structures necessary to protect, restore or increase wetlands, to prevent saltwater intrusion or storm surge." The USACE currently plans to use these funds for the following project features (see Figure 1.7):

- Shoreline protection along Lake Borgne from Doullut's Canal to Jahncke's Ditch (under construction, utilizes some funds from Public Law 109-62)
-
- Shoreline protection along MRGO north bank Miles 44.4 – 39.9 (proposed, NEPA compliance complete)
-
- Shoreline protection along Lake Borgne flanking the opening of Bayou Bienvenue (proposed, NEPA compliance incomplete)

- Shoreline protection along Lake Borgne flanking the opening of Bayou Dupre (proposed, NEPA compliance incomplete)

- Shoreline protection along Lake Borgne west of Shell Beach (proposed, NEPA compliance incomplete)

- Marsh creation through dedicated dredging within the Golden Triangle (proposed, NEPA compliance incomplete)

- Marsh creation through dedicated dredging at Shell Beach (proposed, NEPA compliance incomplete)

In addition to providing funds to develop a comprehensive plan to de-authorize deep-draft navigation on the MRGO, Public Law 109-234 authorized and provided $350 million for construction of enhanced hurricane protection for the IHNC, and $170 million to armor critical areas of the levee system. Efforts to plan and design these items are underway.

Figure 1.3 – MRGO Navigation Project

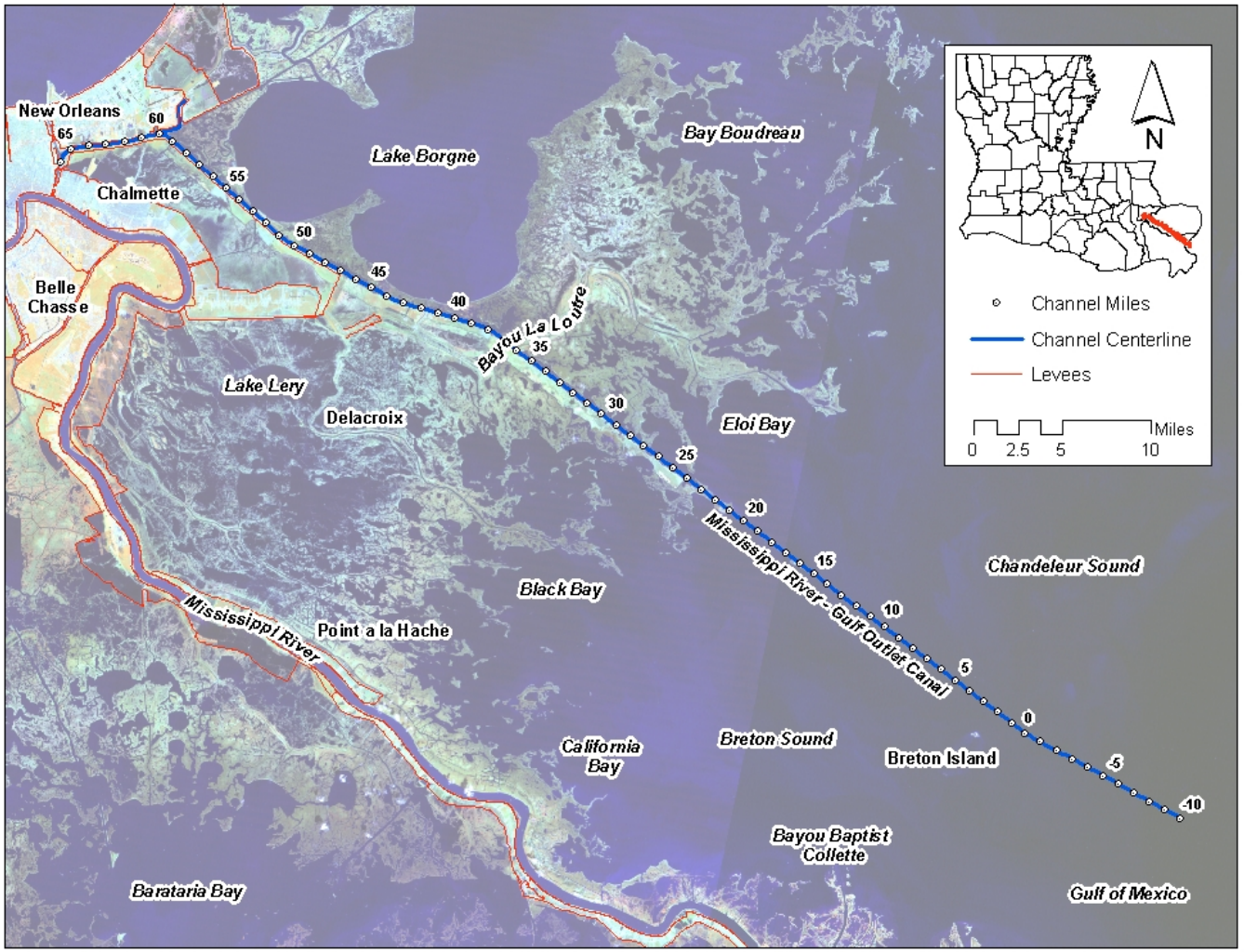


Figure 1.4 - MRGO Navigation Project – Mile 32 to Mile 66

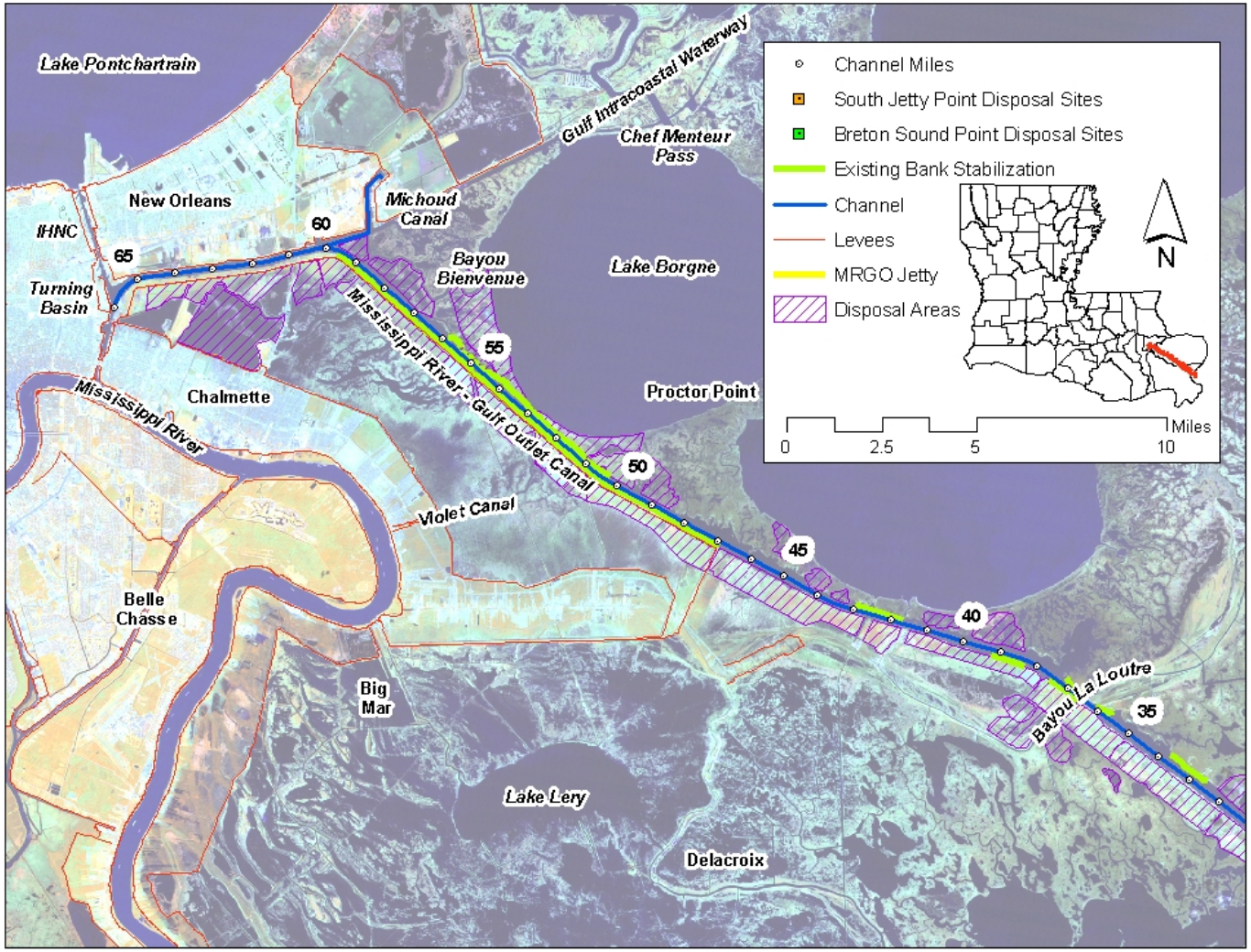


Figure 1.5 – MRGO Navigation Project – Mile 15 to Mile 50

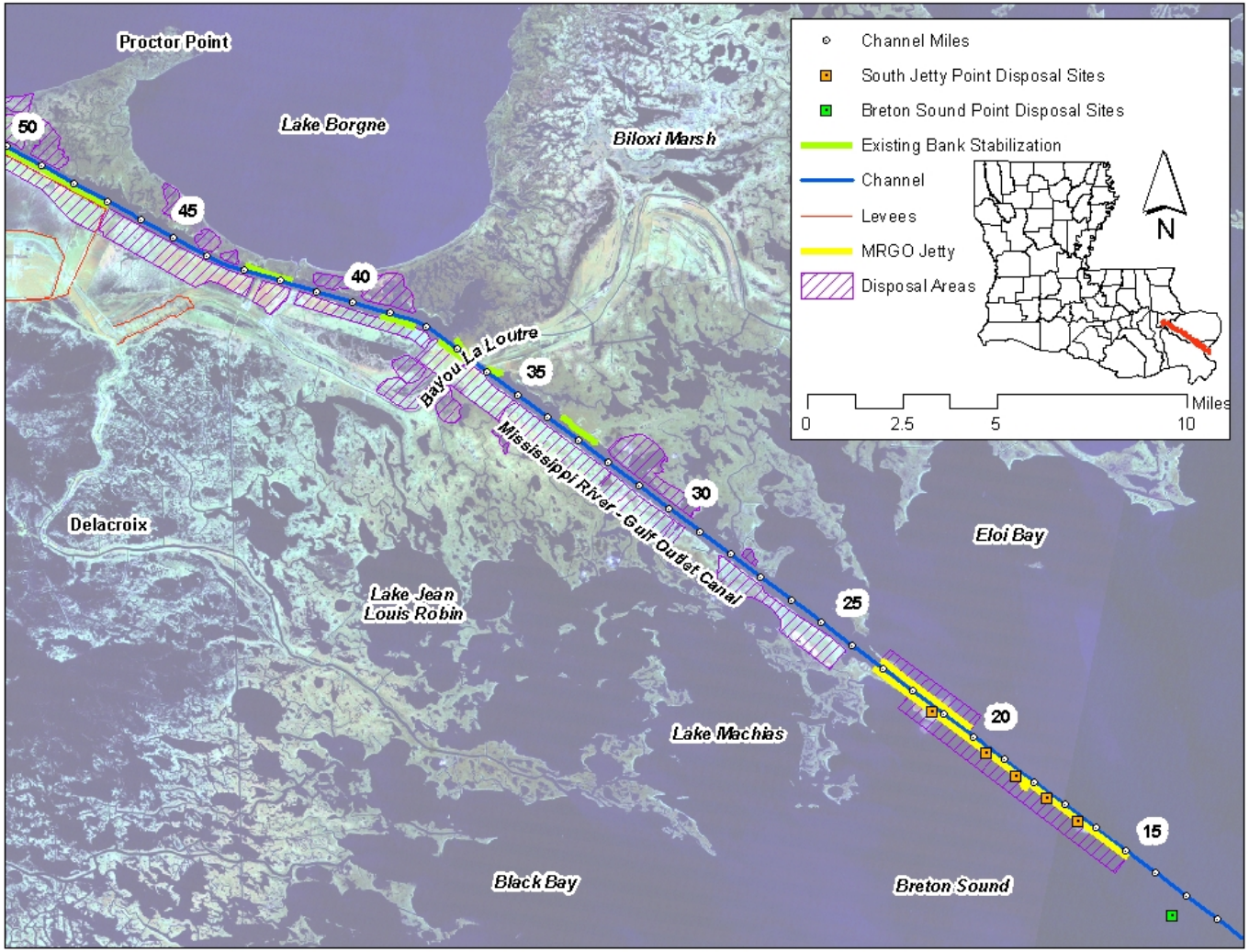


Figure 1.6 – MRGO Navigation Project – Mile -10 to Mile 15

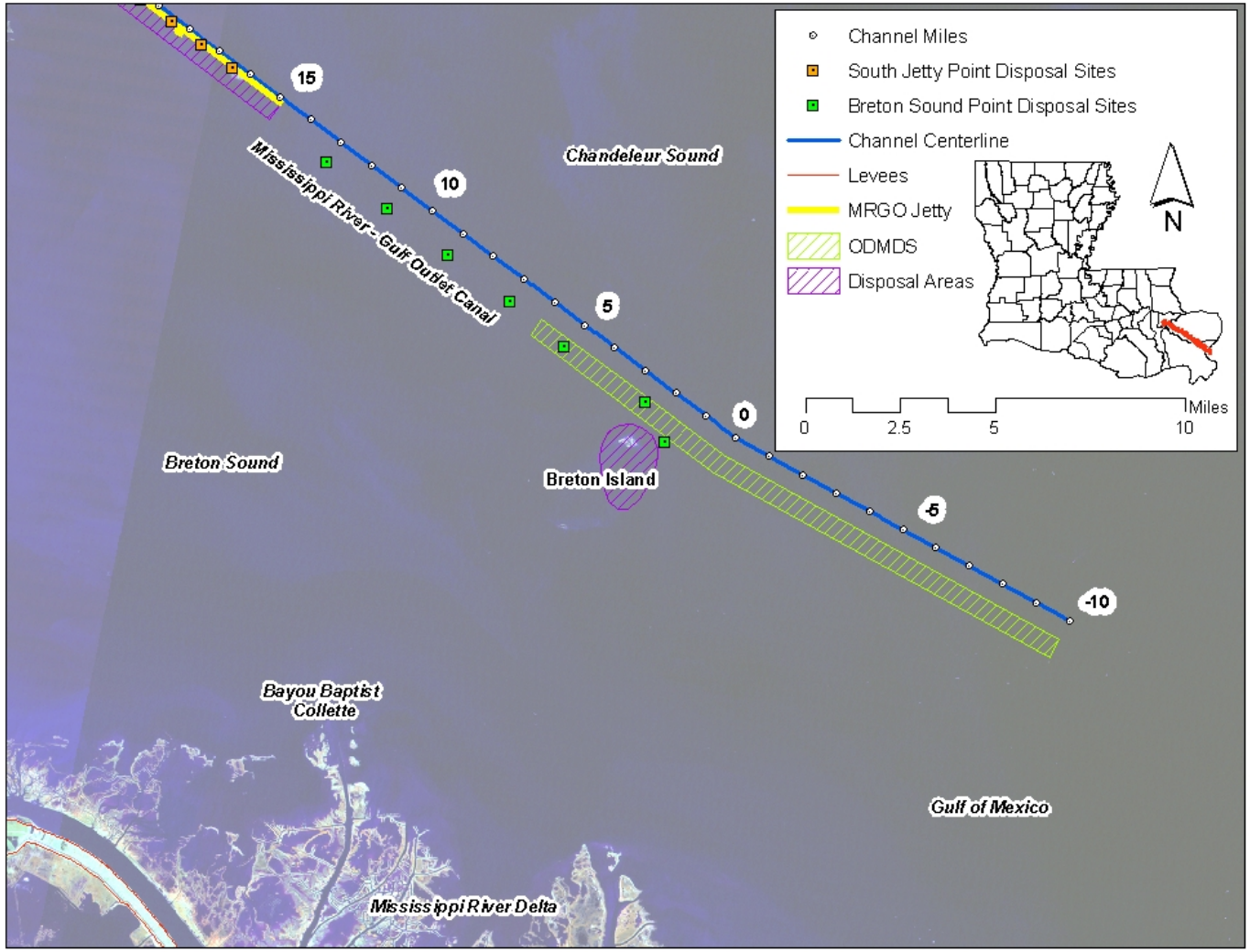
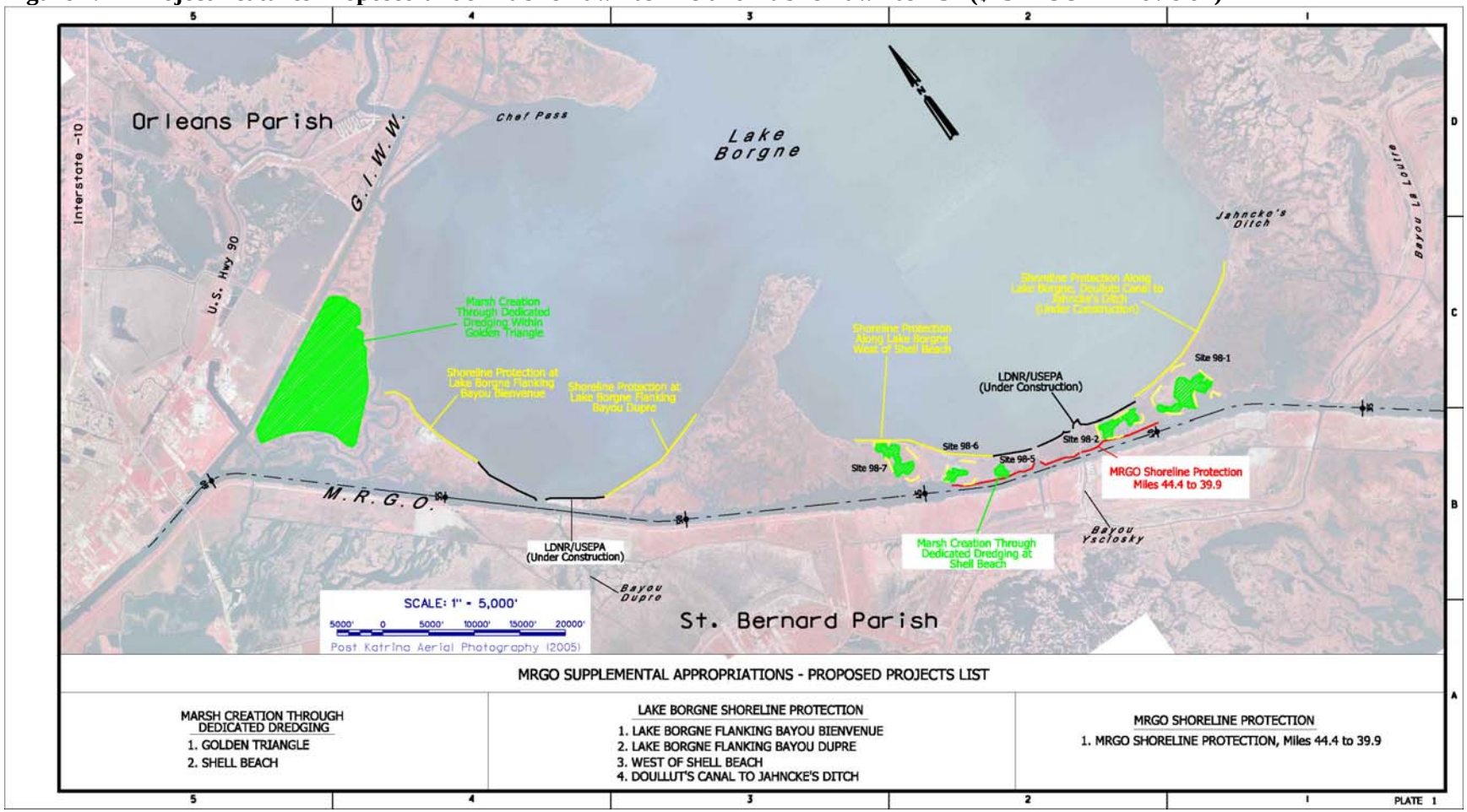


Figure 1.7 – Project Features Proposed under Public Law 109-148 and Public Law 109-234 ($75M O&M Provision)



1.5 STUDY PURPOSE AND NEED

The purpose of the study is to provide to Congress a comprehensive plan to de-authorize deep-draft navigation on the MRGO from the GIWW to the Gulf of Mexico. As requested in the authorizing legislation, an Interim Report to Congress was submitted in December 2006. The Interim Report to Congress stated that preliminary analysis indicated that the best plan was to close the MRGO from the GIWW to the Gulf of Mexico to both deep- and shallow-draft navigation. The MRGO comprehensive de-authorization plan must be consistent with ongoing design and planning efforts related to storm protection and coastal restoration and long-term planning related to the LACPR. In terms of design and planning, this MRGO de-authorization study and subsequent Congressional action defines the navigation future of the MRGO and thus enables other related projects to move forward with more certainty. The study also comports with the Chief of Engineer's "12 Actions for Change" calling for effectively implementing comprehensive systems approaches to water resources problems.

In a letter dated June 2, 2006 (see Appendix A), Governor Blanco of the State of Louisiana made a request for a "plan for closure, restoration of the extensive wetlands lost as a direct result of the MRGO, and the integration of this closure into the comprehensive hurricane protection plan." The USACE and State of Louisiana are partners on efforts to develop LACPR and the state is also a key stakeholder in the development of the MRGO de-authorization study.

1.6 STUDY GOALS AND OBJECTIVES

The goals and objectives for the MRGO deep-draft de-authorization study are derived entirely from the Congressional authorizing language and accompanying committee report. Those goals and objectives are:

- Develop a comprehensive plan to de-authorize deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico
- Evaluate any navigation functions that should be maintained on the MRGO channel
- Identify measures for hurricane and storm damage reduction
- Refine the plan to be fully integrated and consistent with the Louisiana Coastal Protection and Restoration (LACPR) Final Report to Congress

1.7 PRIOR STUDIES, REPORTS AND PROJECTS

Numerous studies, reports and projects have been conducted in the MRGO area. These studies represent the allocation of significant resources towards research provided by the Federal and state government and by private, non-profit foundations. Many of the recommendations have been enacted, such as bank stabilization projects. In this section, these studies are briefly summarized, as well as some of the Federal legislative actions that have made Federal funding possible.

1.7.1 Mississippi River and Tributaries (MR&T)

This is a comprehensive project for flood control on the lower Mississippi River below Cape Girardeau, Missouri. The project was authorized as a result of the 1927 flood of the lower Mississippi River. The MR&T has four major elements: levees, floodways, channel improvement and stabilization, and tributary based improvements. The MR&T system controls and confines the river system before it reaches the coastal area. Several major outlets to the main stem of the river exist for the purposes of flood control during flood stages. The IHNC lock connects the Mississippi River to the IHNC, the MRGO, and Lake Pontchartrain.

1.7.2 Gulf Intracoastal Waterway (GIWW)

The GIWW was authorized and construction was begun in the 1920's. The GIWW traces the U.S. coast along the Gulf of Mexico from Apalachicola Bay near Carrabelle, Florida to the Mexican border at Brownsville, Texas. From its intersection with the Mississippi River, the waterway extends eastward for approximately 376 miles and westward for approximately 690 miles. The GIWW and MRGO intersect and run contiguously from the Michoud area to the IHNC.

1.7.3 Bayous La Loutre, St. Malo and Yscloskey, 1945

The River and Harbor Act of 26 August 1937, modified 2 March 1945 provides for a channel 5- by 40-feet deep from deep water in Lake Borgne to the shore line at the mouth of Bayou Yscloskey; a channel 6- by 40-feet deep from deep water in Lake Borgne through Bayous St. Malo, La Loutre and Eloi to deep water in Lake Eloi; a channel 5- by 30-feet in Bayou La Loutre between Hopedale and Bayou St. Malo. The length of improvements is 30 miles. The MRGO crosses Bayou La Loutre near Hopedale, Louisiana.

1.7.4 MRGO, Michoud Canal, Louisiana Project, 1968

This project was authorized by the River and Harbor Act of 1968 (Public Law 90-483), substantially in accordance with the recommendations of the Chief of Engineers in Senate Document No. 97, 90th Congress. The Chief of Engineers recommended the modification of the existing MRGO Project to provide a deep-draft navigation channel in the GIWW and Michoud Canal by enlargement to a depth of 36 feet over a bottom width of 250 feet from the MRGO channel to and including a turning basin 800 feet square at the north end of the Michoud Canal.

1.7.5 Inner Harbor Navigation Canal Lock Replacement Project, 1956

The IHNC and the IHNC lock were built by the Board of Commissioners for the Port of New Orleans during the late 1910s and early 1920s and placed into service in May 1923. The dimensions of the canal were 200 feet wide x 20 feet deep. Subsequent to the construction of the MRGO, sections of the IHNC were deepened to handle deep-draft ships and the Port of New Orleans constructed a container terminal on the IHNC. Because of the size of the existing IHNC lock, deep-draft shipping can use only the MRGO to access these facilities. The IHNC lock has dimensions of 31.5 feet deep x 75 feet wide x 640 feet long. During World War II, the Federal government leased the IHNC lock and assumed its maintenance and operation. The Federal government acquired the existing lock in 1986. Public Law 84-455 originally authorized construction of a new

lock and connecting channels or replacement of the existing IHNC lock when economically justified. The Water Resources Development Act (WRDA) of 1986 (Public Law 99-662) reauthorized replacement of the lock and established cost share requirements for the project. The WRDA of 1996 (Public Law 104-303) authorized implementation of a Community Impact Mitigation Plan for the project. An Evaluation Report and final EIS were prepared in 1997. The replacement lock will be 110 feet wide x 36 feet deep x 1,200 feet long. The construction period is estimated at 12 years. The cost (in October 2004 price levels) is $764 million. The new lock has not been funded to capability levels since 1998. The project is presently on hold while a supplemental EIS is prepared.

1.7.6 Lake Pontchartrain and Vicinity, Louisiana, Hurricane Protection Project, 1965

This project was authorized by Section 204 of the Flood Control Act of 1965 (Public Law 89-298, as amended), substantially in accordance with the recommendations of the Chief of Engineers in House Document No. 231, 89th Congress. The project currently provides for enlargement of hurricane protection levees along Lake Pontchartrain in Orleans, Jefferson, and St. Charles Parishes and in portions of Orleans and St. Bernard Parishes between the Mississippi River and the MRGO. The Chalmette Loop Levee and Citrus Back Levee segments of this project run parallel to the MRGO. The Act also authorized construction of the Seabrook Lock where the IHNC enters Lake Pontchartrain. Operation and maintenance of the Lock was to occur under the MRGO Project, but the Lock was never constructed.

1.7.7 Mississippi River Outlets, Venice, Louisiana, 1968

"Mississippi River - Additional Navigation Outlets in the Vicinity of Venice, Louisiana" was authorized by the River and Harbor and Flood Control Act of 1968 (Public Law 90-483) to enlarge the existing channels of Baptiste Collette Bayou and Grand-Tigre Passes to provide a 14 feet depth over a bottom width of 150 feet, with entrance channels in open water 16 feet deep over a bottom width of 250 feet. Jetties were authorized to the -6 foot contour. Channel construction was completed in 1978 and jetty construction completed in 1979. Baptiste Collette Bayou, in conjunction with the Mississippi River and MRGO, is an alternate route for shallow-draft traffic when the IHNC lock is closed.

1.7.8 MRGO St. Bernard Parish, Louisiana, Reconnaissance Report, February 1988

The USACE conducted a reconnaissance study of bank erosion and erosion-related problems. Economically justified and environmentally acceptable plans were identified and recommended for further detailed studies. No further action occurred.

1.7.9 Coastal Wetlands Planning, Protection and Restoration Act (CWPPRA), 1990

The Coastal Wetlands Planning, Protection and Restoration Act (Public Law 101-646) Program provides funding for projects that restore the coastal ecosystem. One such project, the MRGO Disposal Area Marsh Protection was approved in 1993 to repair damage to the back dike of the disposal area to preserve approximately 755 acres of wetland. The project was completed in 1999 and at a cost of $342,611. Another project, the Lake Borgne and MRGO Shoreline Protection was approved in 2003 to construct an 18,500-linear-foot rock dike along the Lake Borgne shoreline, and a 14,250-linear-foot rock dike along the north

bank of the MRGO between Doullut's Canal and Lena Lagoon to preserve approximately 266 acres of wetland. Funding of $1.4 million was approved, and the total estimated cost of the project is $25,100,000. Construction for that project has not been approved to date. Additional coastal restoration projects involving shoreline protection and hydrologic restoration have been approved and constructed in the area.

1.7.10 MRGO North Bank Foreshore Protection Evaluation, 1996

This study concluded that providing hardened bank protection along portions of the north bank of the MRGO reduces shoaling rates, thereby decreasing the overall maintenance costs of the channel. The recommended plan was to construct, under authority of the O&M program, hardened bank protection in those reaches identified as being critical because of their high shoaling rates and the imminent loss of the buffering marsh between the MRGO and Lake Borgne.

1.7.11 Coast 2050: Toward a Sustainable Coastal Louisiana, 1998

The Louisiana Coastal Wetlands Conservation Task Force and the Wetlands Conservation & Restoration Authority prepared this plan for the Louisiana Department of Natural Resources. It addressed the problem of depletion of coastal land across Louisiana, including the particular problems of increases in salinity and erosion attributed to the MRGO, and recommended ecosystem management strategies designed to restore wetlands and prevent continued deterioration.

Ecosystem management strategies recommended in the plan in the vicinity of the MRGO are:

- Closure of the MRGO when alternative container port facilities on the Mississippi River are prepared;
- Stabilization of the entire north bank of the MRGO using dredged material behind rock dikes along a 37-mile reach;
- Constriction of breaches in the marshes between the MRGO and Lake Borgne, to reduce salinity in Lake Borgne and the Biloxi Marshes;
- Construction of a sill at Seabrook, to improve salinity in Lake Pontchartrain
- Further study of the 2,000-5,000 cfs freshwater diversion project at the Violet Canal;
- Use of dredged material from the MRGO to create marshes in South Lake Borgne, the Biloxi Marshes, and Eloi Bay.

1.7.12 MRGO Reevaluation Study 2002

In June 1999, pursuant to authority of Section 216 of Public Law 91-611, the USACE-MVN requested and received reprogrammed funds to initiate a reevaluation study of the MRGO based on three factors:

1. The possibility that the Port of New Orleans might move some of its facilities from the IHNC area to the Mississippi River (Millennium Port Plan);

2. The environmental community and local interests characterized the MRGO as an environmental disaster; and

3. Efforts to ameliorate some of the environmental effects of the MRGO using O&M funds were inadequate. In June 2000, the House Committee on Appropriations (House Report 106-693, PL 106-377) provided funds for investigating the future of the MRGO.

The study was not completed due to additional Congressional guidance and authority provided after Hurricane Katrina.

1.7.13 Environmental Assessment for the Lake Borgne Shoreline Protection Project
This USEPA document for CWPPRA project number PO-30 provided an overview of the impacts and/or benefits resulting from the installation of shoreline protection features in Lake Borgne. The goal of this project was to help preserve the existing wetland land bridge between Lake Borgne and the MRGO and thus prevent the coalescence of the two water bodies by constructing shoreline protection features along a total of 5.3 miles of the southern Lake Borgne shoreline near Bayou Dupre and near Shell Beach.

1.7.14 Ecological Review, Lake Borgne and MRGO Shoreline Protection
This USACE/LDNR ecological review for CWPPRA project number PO-32 evaluated project biotic benefits, goals and strategies prior to construction authorization. This evaluation utilized monitoring and engineering information, as well as applicable scientific literature to assess whether or not, and to what degree, the proposed project features would cause the desired ecological response. The goal of this project was to preserve the existing marsh land bridge between Lake Borgne and the MRGO and thus prevent the coalescence of the two water bodies.

1.7.15 Continuing Authorities Program
Section 204 of the Water Resources Development Act (WRDA) 1992, is a "continuing authority" that authorizes the Secretary of the Army to plan, design, and implement certain ecosystem restoration measures, subject to specified cost sharing, without additional project specific Congressional authorization. Section 204 authorizes the beneficial use of dredged material in connection with construction or maintenance dredging of an authorized navigation project. Projects performed under Section 204 on the MRGO include the placement of dredged material from miles 14 to 12 adjacent to the south jetty for wetland creation and the placement of dredged material from mile -2 to -4 on Breton Island for barrier island restoration.

1.7.16 Louisiana Coastal Area Ecosystem Restoration Study (LCA 2004)
The USACE and the State of Louisiana prepared this study to identify the most critical ecological needs of the coastal area and to describe alternative restoration strategies. The MRGO was identified as one of the five specific areas with significant needs, and environmental restoration costs for an MRGO near-term plan were estimated at $121,736,000 (2004 dollars). The LCA Plan recommended construction of rock breakwaters along 23 miles of the north bank of the MRGO, and 15 miles of the southern

shore of Lake Borgne. This construction would address the anticipated loss of 6,350 acres of marsh over a 50-year period of analysis. The Chief of Engineers and the Assistant Secretary of the Army for Civil Works approved and transmitted the LCA Plan to the Administration and Congress. The plan is awaiting congressional action on a Water Resources Development Act bill for authorization.

1.7.17 Second Emergency Supplemental Appropriations Act to Meet the Immediate Needs Arising from the Consequences of Hurricane Katrina, 2005 (Public Law 109-062)

Adopted by Congress on September 2, 2005, following Hurricane Katrina, this law provided emergency supplemental funding to repair damage to flood control and hurricane shore protection projects. A portion of this funding was allocated to rebuilding the hurricane protection levee located on a portion of the MRGO dredged material disposal area between Bayou Bienvenue and Verret, Louisiana.

1.7.18 Department of Defense, Emergency Supplemental Appropriations to Address Hurricanes in the Gulf of Mexico, and Pandemic Influenza Act, 2006 (Public Law 109-148) and Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (Public Law 109-234)

The Department of Defense, Emergency Supplemental Appropriations to Address Hurricanes in the Gulf of Mexico, and Pandemic Influenza Act, 2006 (Public Law109-148) provided $75,000,000 for operation and maintenance activities along the MRGO. The Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (Public Law 109-234) clarified that the funds were to be used for "the repair, construction or provision of measures or structures necessary to protect, restore or increase wetlands, to prevent saltwater intrusion or storm surge." An EIS for this work is being prepared. This operation and maintenance activity is called Mississippi River - Gulf Outlet, Louisiana, and Lake Borgne Wetland Creation and Shoreline Protection.

In addition to providing funding to develop a comprehensive plan to de-authorize deep-draft navigation on the MRGO, Public Law 109-234 provided nearly $4 billion for levee improvements and flood control projects in the New Orleans area. This appropriation included $1,584 million to reinforce or replace floodwalls, $495.3 million for levee projects, $350 million for construction of enhanced hurricane protection on the IHNC, and $170 million to armor critical areas of the levees.

1.7.19 Coastal Impact Assistance Program, 2006

The Coastal Impact Assistance Program (CIAP) was authorized by Section 384 of the Energy Policy Act of 2005. This federally funded program assists oil and gas producing coastal states and their political subdivisions in mitigating the impacts from Outer Continental Shelf (OCS) oil and gas production. There are two Tier One CIAP projects in the project area: Central Wetlands Assimilation (treated sewerage pumped into wetlands) and Orleans Land Bridge Shoreline Protection and Marsh Creation. The Lake Borgne Shoreline Protection is a Tier Two project.

1.7.20 Louisiana Coastal Protection and Restoration (LACPR), 2006

This study by the USACE for the U.S. Congress includes the analysis and design of hurricane risk reduction, coastal restoration, and flood control measures. A Preliminary Technical Report was submitted to Congress in July 2006. The final study will evaluate different alignments of structural measures, such as floodgates, floodwalls, and levees, to compare relative reduction of risk of flooding and storm surge, including the possibility of structural measures affecting the MRGO. The final study will also evaluate nonstructural measures, such as elevating homes. In addition, it will propose various wetland restoration projects and highlight the role of wetlands in coastal risk reduction.

1.7.21 Integrated Ecosystem Restoration and Hurricane Protection: Louisiana's Comprehensive Master Plan for a Sustainable Coast, 2007

The State of Louisiana's Master Plan calls for "construction of a closure structure at Bayou La Loutre that will restore the integrity of the Bayou La Loutre ridge. This will affect both the shallow-draft and deep-draft navigation industries, and it may have unintended consequences for adjacent landowners."

1.7.22 Environmental Assessments and Environmental Impact Statements

The USACE-MVN has prepared many Environmental Assessments (EAs) and Environmental Impact Statements (EISs) to evaluate potential impacts of project specific proposed actions in and around the MRGO. These EAs and EISs were prepared in accordance with the NEPA of 1969 and the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508), as reflected in the USACE Engineering Regulation, ER 200-2-2. These documents, as listed in Appendix L, are hereby incorporated into this LEIS by reference.

1.8 THE MRGO AND STORM SURGE

Numerous people believe that the Inland Reach of the MRGO exacerbates storm surges in the region and that the MRGO was responsible for flooding of both St. Bernard and Orleans Parishes during Hurricanes Betsy and Katrina. However, several studies described below indicate that this was not the case (see Appendix D).

A 1966 study (Bretschneider and Collins, 1966) examined six different storm scenarios using one-dimensional numerical modeling, and concluded that Hurricane Betsy, which occurred in 1965 during the construction of the MRGO, would have produced the same storm surge elevations with or without the MRGO.

In 2003, a study was completed using two-dimensional Advanced Circulation (ADCIRC) modeling for storm surge (USACE 2003). Nine different scenarios were modeled, both with and without the MRGO (shallow marsh in place of the channel). The model runs demonstrated that the maximum difference in storm surge with and without the MRGO was just over 6 inches.

Following Hurricane Katrina, the Interagency Performance Evaluation Task Force (IPET) studied the New Orleans hurricane protection systems, storm surge, performance of flood protection measures, and the consequences of the hurricane (USACE 2007a and USACE

2007b). The IPET found that the MRGO Inland Reach had little influence on flooding in St. Bernard Parish during Hurricane Katrina, because when the marshes surrounding the MRGO are inundated, the water conveyed through the channel is a relatively small part of the total. The IPET Report states "during Katrina, the MRGO was far from the 'hurricane highway' moniker with which it has been branded." The report found that high surge and high, long-period waves overtopped the MRGO levees well before the hurricane made landfall, and that the high velocities of water moving over the levees caused scouring and breaching of levees along the MRGO (USACE 2007b).

The IPET does state that "While the simulations clearly show that Reach 2 [Inland Reach] of the MRGO does not significantly influence the development of storm surge in the region for large storm events, Reach 1 (the combined GIWW/MRGO section) and the IHNC, together, provide a hydraulic connection between Lake Borgne and Lake Pontchartrain. As a result of this connection, the storm surge experienced within the IHNC and Reach 1 (GIWW/MRGO) is a function of storm surge in both Lakes; a water level gradient is established within the IHNC and Reach 1 [GIWW Reach] that is dictated by the surge levels in the two lakes. This is true for both low and high storm surge conditions. To prevent storm surge in Lake Borgne from reaching the IHNC or GIWW/MRGO sections of [the] waterway, flow through the Reach 1 [GIWW Reach] channel must be dramatically reduced or eliminated, either by a permanent closure or some type of structure that temporarily serves to eliminate this hydraulic connectivity. The presence of an open channel is the key factor" (USACE 2007b). Flow through the GIWW Reach of the MRGO is being addressed through efforts to provide comprehensive hurricane and storm protection through the Lake Pontchartrain and Vicinity Hurricane Protection project 100-year protection effort.

In 2006, the USACE analyzed the Southeast Louisiana Hurricane Protection System and found that "[t]he southeast trending leg of the Mississippi River-Gulf Outlet (MRGO) had little influence on the water levels in the IHNC during Katrina" (USACE 2007a). This conclusion was reached after comparing the results of ADCIRC models runs, assuming the MRGO channel existed in its pre-Katrina conditions, and then assuming that the MRGO did not exist.

A 2006 study by the Louisiana Department of Natural Resources also evaluated the impact of the MRGO on storm surge using ADCIRC modeling. This study considered seven different scenarios. The conclusions were that the MRGO does not contribute significantly to peak storm surge during severe storms where the surrounding wetland system is overwhelmed with water, and that closure would not provide significant, direct mitigation of severe hurricane storm surge. However, closure of the MRGO may, according to the LDNR study, modestly delay the onset of surge in a few locations and "would significantly reduce storm surge scour velocities at some locations" (LDNR 2006).

Studies also demonstrated that the most noticeable effect of the MRGO occurs for small surge events, where the marsh areas are not completely inundated (USACE 2007b; LDNR 2006). As part of LACPR, further storm surge modeling analyses are underway to consider scenarios with new structural flood protection features, such as levees and

floodgates. Solutions to concerns regarding the impact of storm surge that the public has posed include barrier construction, such as floodgates at some points along the MRGO, and partially or completely filling in the channel.

SECTION 2 FORMULATION OF ALTERNATIVE PLANS

This chapter includes a discussion of the collaborative planning process, development of alternatives in the Interim Report to Congress, the future without de-authorization, alternatives eliminated from further study, alternatives evaluated in detail, a comparison of these alternatives, rationale for choosing the Recommended Plan, a brief description of that plan, and how it will be integrated into the LACPR process.

In order to ensure that sound decisions are made, the USACE plan formulation process requires a systematic and repeatable approach. The Economic and Environmental Principles for Water and Related Land Resources Implementation Studies and The Economic and Environmental Guidelines for Water and Related Land Resources Implementation Studies (Planning Guidance Notebook, ER 1105-2-100) describe the USACE study process and requirements. Alternatives were formulated to minimize cost associated with the disposition of the de-authorized project. These alternatives were also evaluated against the following four criteria:

- *Completeness* - the extent to which a given alternative plan provides and accounts for all necessary investments or other actions to ensure the realization of the planned effects.

- *Effectiveness* - the extent to which an alternative plan alleviates the specified problems and achieves the specified opportunities.

- *Efficiency* - the extent to which an alternative plan is the most cost-effective means of alleviating specified problems and realizing the specified opportunities, consistent with protecting the Nation's environment.

- *Acceptability* - the workability and viability of the alternative plan with respect to acceptance by state and local entities and the public and compatibility with existing laws, regulations, and public policies.

Plan formulation did not consider stand alone ecosystem restoration measures as this was not included in the study authority. However, to provide a comprehensive plan, formulation incorporated consideration of the ecosystem restoration advantages that might be provided by measures that limit channel access.

2.1 COLLABORATIVE PLANNING

In response to Congressional direction to develop a comprehensive MRGO deep-draft de-authorization plan, the USACE established a strategy for developing the Interim and Final Reports. Federal, state and local government parties, environmental groups, landowners, navigation interests, other organizations, and individuals were invited to assist in preparation of the reports. This approach is a sound business process for problem solving and is consistent with USACE guidance in EC 1105-2-409 (Planning in a Collaborative Environment) and ER 1105-2-100 (Planning Guidance Notebook).

A series of public stakeholder forums were held which included technical presentations and open discussions on topics including wetlands, navigation, storm protection, and the local economy. Each stakeholder group was asked to identify their own plans for de-authorization of the MRGO, environmental restoration measures in the vicinity of the MRGO, and hurricane protection plans. Several stakeholder groups prepared such plans.

A public meeting was held on October 28, 2006 at the University of New Orleans and involved an open house where stakeholder groups were offered display space to present their plans. More than 150 people attended the public meeting, which included a formal presentation of the study process and scope from the USACE and an open comment period for public statements from citizens, organizations, and elected officials. Public comments made in this meeting were evaluated in plan formulation for the Interim Report to Congress.

Through the collaborative process several consensus measures emerged that were supported by many stakeholders. However, the different stakeholders could not agree on a single measure, plan, or sequence of measures to close the channel. Their recommendations varied from total closure to a sector gate with a draft of 28 feet. Many of the measures from the stakeholder plans were incorporated into the Interim Report to Congress. Collaborative planning continued after the submittal of the Interim Report to Congress and that approach remains a key component of the preparation of the Final Report to Congress and LEIS. For further description of the proposed stakeholder plans, see Section 4.

A public information meeting was held on May 19, 2007 at Nunez Community College in Chalmette, Louisiana. The meeting offered attendees an opportunity to view a series of posters presented by the USACE on the elements of the study. In addition, various stakeholders displayed information and interacted with the meeting attendees. More than 100 attendees listened to a formal presentation regarding the alternatives evaluated in detail and the Recommended Plan. Following the presentation, attendees had the opportunity to ask questions. All attendees were made aware of the study schedule and process and invited to continue to participate.

Input from the public, stakeholders, and agencies received through the collaborative planning process provided significant information which was used by the USACE to assess the acceptability of alternatives.

Agencies were not approached to assume responsibility for implementing components of the Recommended Plan other than to coordinate required environmental compliance actions and the removal of aids to navigation. Interagency support of the Recommended Plan has been expressed (see Appendix P). Given the nature of the Recommended Plan, few if any opportunities exist for other agencies to implement plan components. The LACPR effort, of which the MRGO Final Report and LEIS is a part, will likely result in recommendations for sharing implementation responsibilities across agencies.

2.2 DEVELOPMENT OF ALTERNATIVES FOR INTERIM REPORT TO CONGRESS

For the Interim Report to Congress, a USACE technical team evaluated potential modifications to the current uses of the navigation channel with the intent of determining if any uses should be maintained. The evaluation included information presented in the stakeholder meetings, data gathered through a survey of maritime businesses, and government records of annual channel utilization. A broad suite of initial alternatives was identified for development of the deep-draft de-authorization plan. The alternatives presented in the Interim Report to Congress include:

Interim Report Alternative 1 – Maintain a shallow-draft MRGO navigation channel.
Alternative 1a – Maintain a shallow-draft navigation channel without a structure;
Alternative 1b – Construct a salinity control weir at Bayou La Loutre;
Alternative 1c – Construct a salinity control gate at Bayou La Loutre (normally closed);
Alternative 1d – Construct a storm protection gate at Bayou La Loutre (normally open).
All of the shallow-draft MRGO navigation alternatives would require maintenance dredging of a 12-foot deep by 125-foot wide channel to match the authorized dimensions of the GIWW.

Interim Report Alternative 2 - Close the MRGO channel to deep-draft and shallow-draft vessels. Closure of the MRGO to all vessel traffic could be realized by blocking the channel via any of the following variations:
Alternative 2a – Construct a total closure structure across the MRGO at Bayou La Loutre;
Alternative 2b – Restore both banks of Bayou La Loutre across the MRGO at Hopedale, Louisiana; or
Alternative 2c – Fill in the entire MRGO channel from the GIWW to the Gulf of Mexico.

Interim Report Alternative 3 - Cease all MRGO operations and maintenance activities (dredging, jetty repairs, and navigation aids). If Congress chooses to discontinue all activities related to maintaining the MRGO, several relic project features would need to be addressed. These features include navigation aids such as buoys and lights and the offshore jetties located in Breton and Chandeleur Sounds. Development of a comprehensive de-authorization plan should include disposal of these relic features. There would be no more beneficial use of dredged material.

The alternatives developed for the Interim Report to Congress are explained in detail below:

Interim Report Alternative 1a - Maintain a Shallow-Draft MRGO Navigation Channel Without a Structure
Under Alternative 1a, the MRGO would be maintained for commercial and recreational shallow-draft navigation only with a depth and width of 12 feet by 125 feet for the Inland and Sound Reaches. This alternative was developed to allow continued shallow-draft navigation. It is likely to have only a very minimal effect on reducing salinity or storm

surge in a tropical storm event. The only environmental benefit could be removal of deep-draft vessels from the channel which could significantly reduce bank erosion.

Interim Report Alternative 1b – Construct a Salinity Control Weir at Bayou La Loutre

Under Alternative 1b, a weir would be constructed just south of Bayou La Loutre to allow passage of shallow-draft vessels. The MRGO would be constricted at the weir to 125-feet wide by 14 feet deep. This alternative was developed to allow continued shallow-draft navigation and to reduce salinity above the structure which could provide environmental benefits. Removal of deep-draft vessels could significantly reduce bank erosion.

Interim Report Alternative 1c – Construct a Salinity Control Gate at Bayou La Loutre (Normally Closed)

Under Alternative 1c, a gated structure would be constructed just downstream of Bayou La Loutre that would allow passage of shallow-draft vessels. The gated structure would have a sill depth of 14 feet and a 125-foot wide opening. The gate would normally be closed to reduce saltwater intrusion, but would be opened for passage of commercial and recreational shallow-draft vessels. This alternative was developed to allow continued shallow-draft navigation and to significantly reduce salinity above the structure. The gate could also close the channel for any tropical storm event and associated storm surge. By keeping the gate closed except when vessels are present, it could have the greatest salinity reduction of all the shallow-draft Alternatives. Removal of deep-draft vessels could significantly reduce bank erosion.

Interim Report Alternative 1d – Construct a Storm Protection Gate at Bayou La Loutre (Normally Open)

This Alternative comprises similar structural components and earthwork as Alternative 1c: a sector gate with tie-in T-wall and earthen dam. This alternative was developed to allow continued shallow-draft navigation, to reduce storm surge from tropical storm events and to reduce salinity above the structure. The gate would be operated to close the channel only for a tropical storm event and associated storm surge. Reduction of salinity could be similar to Alternative 1b above. Removal of deep-draft vessels could significantly reduce bank erosion.

Interim Report Alternative 2a – Construct an Armored Earthen Dam Across the MRGO at Bayou La Loutre

This plan was developed to remove both shallow and deep-draft vessels from the MRGO, reduce salinity and tropical storm surge and allow the most compatibility with a freshwater diversion. It could reduce salinity more than any of the Alternative 1 options. Removal of deep-draft vessels could significantly reduce bank erosion.

Interim Report Alternative 2b – Restore Both Banks of Bayou La Loutre Across the MRGO at Hopedale, Louisiana

Under Alternative 2b, two earthen dams would be constructed to restore the banks of Bayou La Loutre. One dam would connect the ridge on the north side of Bayou La

Loutre on the Hopedale side with the north ridge on the Biloxi Marsh side. The second dam would connect the south ridges across the MRGO. This would totally block the MRGO channel with two structures. This plan was developed to allow shallow-draft navigation, reduce salinity and tropical storm surge and to totally block access to Bayou La Loutre from the MRGO. Removal of deep-draft vessels could significantly reduce bank erosion.

Interim Report Alternative 2c –Fill in the Entire MRGO Channel from the GIWW to the Gulf of Mexico

Under Alternative 2c, the entire MRGO would be filled from the intersection of the GIWW to Breton Sound. This Alternative has been requested by several stakeholders and was frequently noted in public comments. Recreational craft would not be able to use any portion of the Inland Reach of the MRGO.

Interim Report Alternative 3 - Cease All MRGO Operations and Maintenance Activities

Under Alternative 3, no additional Federal funds would be used to maintain a minimum channel depth on of the MRGO between the GIWW and the Gulf of Mexico. There would be neither construction nor operation and maintenance costs for this Alternative. This was developed as the least cost plan. It would have no impact on storm surge in tropical storm events or salinity reduction. Removal of deep-draft vessels could significantly reduce bank erosion.

2.3 EVALUATION OF NAVIGATION FUNCTIONS THAT SHOULD BE MAINTAINED

The USACE evaluated what navigation functions, if any, should be maintained on the MRGO between the GIWW and the Gulf of Mexico. Analysis of deep-draft navigation indicates that maintaining the authorized dimensions of the MRGO between the GIWW and the Gulf of Mexico is not cost-effective. Average annual operations and maintenance (O&M) costs to dredge a single shipping lane in the MRGO Inland Reach are $12.5 million. However, maintaining a single shipping lane, which is half of the authorized dimensions, only produces approximately $3.7 million per year in transportation efficiencies, based on NED criteria. Efforts to operate and maintain the fully authorized dimensions (i.e. a two-lane channel, 500-feet wide by 36-feet deep) would be even more costly and would not produce greater navigation benefits. The analysis indicates that the maintenance of a deep-draft navigation channel of any dimension on the MRGO between the GIWW and the Gulf of Mexico is not economically justified.

The $3.7 million per year in transportation inefficiencies that navigation would incur if the MRGO channel were not available are comprised of two sources. The first source is the increased travel time (approximately 4 hours) that both deep-draft vessels and shallow-draft vessels would have to incur by having to use the Mississippi River to reach their ultimate destinations. The second source is from the shallow-draft traffic that uses the MRGO as an alternate route when the IHNC Lock is not operable.

Historically, the MRGO has also served as an alternate navigation route for shallow draft vessels during times of extreme congestion at the IHNC Lock or when the lock was inoperable. Before Hurricane Katrina some barge tows would travel downstream on the Mississippi River to Baptiste Collette Bayou, exit Baptiste Collette Bayou into Breton Sound, and then enter the MRGO. Eastbound tows would then travel back inland from Breton Sound on the MRGO to the GIWW Reach before continuing east to locations in Mississippi, Alabama, and Florida (westbound traffic would traverse the opposite route). The alternative route around the IHNC Lock is about 180 miles longer than a direct lock through from the GIWW to the Mississippi River. Vessel operators would weigh factors such as anticipated time of delay, added fuel consumption, weather, and insurance ratings when making a decision to proceed through the alternative route or to wait to pass through the lock. The bypass takes approximately 24 hours to navigate.

Approximately 100 vessels use the MRGO as an alternate route per year when the IHNC Lock is not operable. Vessels can save time if the lock is down for a period of greater than 24 hours and/or there is a long queue. The additional time lost from not having access to the MRGO as an alternate route when the IHNC Lock is inoperable has been estimated to be approximately 48 hours. The portion of the $3.7 million per year in transportation inefficiencies that is attributed to the loss of the MRGO as an alternative route when the IHNC Lock is not operable is $400,000 per year.

The economic information available also indicates that it is not cost-effective to maintain a shallow-draft channel between the GIWW and the Gulf of Mexico in terms of NED criteria. The benefits of authorizing the MRGO to 12 feet are the reduction in the transportation inefficiencies compared to the total closure option for the channel. If the MRGO were to be closed between the GIWW and the Gulf of Mexico, shallow-draft vessels would have to take a longer alternate route along the Mississippi River. In addition the MRGO would no longer be available as an alternate route to the GIWW for shallow-draft traffic when the IHNC Lock is not functioning or is congested. Taking these two issues into account, it is estimated that the average annual benefits of authorizing the MRGO to 12 feet is $1.2 million (of which $400,000 results from the use of the MRGO as an alternate route when the IHNC Lock is inoperable). The total average annual costs to maintain a 12 foot shallow-draft channel is approximately $6 million.

Based on the above analysis, the USACE concluded that no navigation function on the MRGO between the GIWW and the Gulf of Mexico is economically justified. Therefore continued authorization of the MRGO between the GIWW and the Gulf of Mexico for any form of navigation is not economically justified based on the comparison of navigation costs and benefits according to NED criteria. Based on this conclusion, the USACE proceeded to eliminate some alternatives from further study and to carry forward a final array of alternatives for detailed evaluation that would implement de-authorization of the MRGO from the GIWW to the Gulf of Mexico.

For this report, the USACE used the definition of deep-draft vessels contained in ER 1105-2-100 (Planning Guidance Notebook), which are those vessels requiring drafts greater than 14 feet.

2.4 ALTERNATIVES ELIMINATED FROM FURTHER STUDY

Interim Report Alternatives 1a – 1d
All of the alternatives identified in the Interim Report to Congress that included maintenance of the MRGO channel for shallow-draft navigation between the GIWW and the Gulf of Mexico were eliminated from further consideration based on economic analysis. Economic information indicates that shallow-draft traffic on the MRGO between the GIWW and the Gulf of Mexico is not cost-effective in terms of National Economic Development (NED) benefits. The total average annual costs to maintain a 12-foot shallow-draft channel between the GIWW and the Gulf of Mexico is approximately $6 million, whereas the estimated annual benefits are approximately $1.2 million.

Interim Report Alternative 2b
This Alternative was eliminated from further consideration because it achieves similar environmental and navigation results as Alternative 2a, but at approximately twice the cost. Also, when compared with Alternative 2a, there are additional negative impacts to recreational and commercial vessel users because access to Bayou La Loutre from the north is blocked.

Interim Report Alternative 2c
This Alternative was eliminated from further consideration due to its high cost and the length of time required for full implementation. It is estimated that it would require approximately 250-350 million cubic yards of dredged material to fill the channel from mile 60 to mile 25 at a cost of about $2.8 billion based on October 2006 price levels. The material could be mined from the ODMDS by a hydraulic dredge, loaded into large scow barges, transported to the Inland Reach and off loaded. Depending on how many scow barges could be employed at once, it could take from 15 to 44 years to completely fill the channel.

Other Alternatives
Other alternatives were suggested after release of the Interim Report to Congress. These included multiple closure locations, limited channel filling, shoreline restoration and stabilization, and vegetative plantings. Alternatives dealing with ecosystem restoration were deemed to be beyond the authority of the MRGO de-authorization study; however, they will be considered under LACPR and other appropriate authorities. In addition to study authority, alternatives were eliminated from further consideration based upon costs, impacts to the environment, limited availability of construction materials, constructability issues, and effectiveness in meeting the study goals and objectives. Alternatives recommended after release of the Interim Report are discussed in greater detail in Section 4 and in Appendix P.

2.5 ALTERNATIVES EVALUATED IN DETAIL

In order to prepare the Final Report to Congress and the Legislative Environmental Impact Statement, in addition to the Future Without De-authorization three Alternatives were carried into the final array of alternatives for detailed evaluation. The alternatives evaluated in detail are listed below:

- Future Without De-authorization - The channel would be dredged to the Congressionally authorized dimensions of 500-foot bottom width in the Inland and Sound Reaches and a 600-foot bottom width in the Bar Channel. The channel would be maintained at these widths. Dredged material would be used beneficially behind the jetties and on Breton Island.

- Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately;

- Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre (phased construction would begin with a weir and be completed with a total closure structure);

- Alternative 3 – Cease All MRGO Operations and Maintenance Dredging Activities Immediately.

The following features are common to Alternatives 1, 2, and 3:

- The MRGO channel would be de-authorized for navigation from mile 60 at the southern bank of the GIWW to the Gulf of Mexico.

- Aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard.

- Existing bank stabilization features and jetties would be de-authorized, but left in place.

2.5.1 Preliminary Engineering on Alternatives Evaluated in Detail

Preliminary engineering was conducted on all alternatives carried into the final array for detailed evaluation. The preliminary engineering is presented in Appendix C. The following paragraphs present a summary of the relevant preliminary engineering analyses that influenced plan formulation, particularly pertaining to the location and design of the total closure structure proposed under Alternatives 1 and 2.

Determining the location of the proposed total closure structure evaluated in Alternatives 1 and 2 was based on two principle considerations: 1) an appropriate physical location to prevent deep-draft navigation, and 2) engineering and design criteria relevant to site selection for construction. For purposes of preventing deep-draft navigation, closure could occur at many points along the MRGO channel. However, based upon available

engineering information and design criteria, a site located just south of Bayou La Loutre is most favorable.

A number of locations along the MRGO were identified as potential closure structure locations. These included the lower channel at the jetties, and several sites in the vicinity of Bayou La Loutre, Shell Beach, Bayou Dupre, and Bayou Bienvenue. Most of these sites were eliminated because of multiple engineering factors, especially channel width and subsurface soil conditions. The most favorable site for a total closure structure is immediately south of the Bayou La Loutre crossing. This site represents the narrowest section of the channel and offers the best area soil conditions because of proximity to the historic Bayou La Loutre ridge.

Based on existing data and historic knowledge of the project site, a preliminary closure design and quantification was prepared to address the closure structure proposed under Alternatives 1 and 2. Designs analyzed included plans for a total channel closure as follows:

1. Dredged-In earthen closure. This approach assumes borrow from the MRGO below the depth of the authorized navigation channel. Assuming that (1) suitable borrow material is found between elevations -50 feet and -70 feet, (2) a 300-foot corridor centered on the MRGO centerline is made available, and (3) a bulking factor of 2.0; an approximate 3 mile reach of borrow corridor would be needed. Due to the potential of less than desirable characterization of the borrow source, this option includes rock toe dikes on both ends of the dike section, perpendicular to the MRGO to assist in retention of materials and to better manage the ultimate side slopes of the closure section. Construction would entail pumping a 300-foot-wide crown structure and maintaining 1V on 30H side slopes. The requirements for consolidation of the dredged material mandate the assumption that at least two construction lifts would be required to complete this effort. Seeding and fertilizing of the resulting berm was included in the cost estimate (see Appendix C).

2. Barged in earthen closure. This option assures a better source of construction materials, and being mechanically placed, allows for steeper side slopes and a smaller crown width. However, the transportation costs associated with barged in material greatly increases cost of the closure structure. Again, only fertilizing and seeding was included in this original estimate; stone paving was assumed for any required repairs. The section was reduced to a 200-foot crown and 1V on 10H side slopes. Consolidation of placed material is a concern, but only one lift was included in this preliminary estimate (see Appendix C).

3. Total Rock Closure. This design assures better control of placed material. It eliminates the concern of consolidation of earthen construction materials. The dimensions of the rock closure assumed 25-foot to 30-foot crown width, with 1V on 2.5H side slopes. This design would result in less maintenance due to reduced structure erosion. Quarry run stone would be specified to increase fines in the mix, minimizing voids and reducing salt water intrusion. Based on assumptions made, this was the least costly design alternative (see Appendix C).

4. Cellular Sheet Pile Closure. This option consisted of cellular sheet pile structures, sand filled, with stone berm on either side. This design provided a less permeable solution than the total rock closure, but was as much as twice as expensive based on preliminary cost estimates and professional judgment (see Appendix C).

2.5.2 Assessment of Planning Risk and Uncertainty

Evaluating risk and uncertainty is an important element in realistic forecasting and planning to solve water resources problems. The U.S. Army Corps of Engineers recognizes the need to evaluate risk and uncertainty and has developed several regulatory guidelines for use in project studies and design work. The majority of USACE guidelines for risk assessments are related to flood damage reduction studies (see ER 1105-2-101 and EM 1110-2-1619). However, a primary reference relevant to the MRGO de-authorization study is the "Guidelines for Risk and Uncertainty Planning in Water Resources Planning" developed through the Institute for Water Resources. An overview of the approach outlined in the document is summarized as:

> "*The risk analysis framework involves the well recognized four basic steps in dealing with any risk: characterization, quantification, evaluation, and management. The purpose of conducting these analyses is to provide additional information to Federal and non-Federal partner decision makers on the engineering and economic performance of alternative investments that address water resources problems. The aim is to produce better decisions and to foster the development of the notion of informed consent by all parties to an investment decision.*"

The risks involved with planning for the MRGO de-authorization are primarily associated with uncertainties in forecasting future conditions for economic development, navigation utilization, and environmental quality factors. The project delivery team has assessed various data needs and drawn from existing information sources to support project planning. Where feasible the team endeavored to collect new data to characterize conditions in the study area and to aid in system analysis. This information has been quantified in standard metrics for comparison between alternative plans and reporting in the evaluations supporting the recommended plan. Specifically the team identified the rate of channel shoaling and use of the MRGO as an alternative by-pass route as two significant risk and uncertainty factors in the study.

Shoaling rates are a critical factor in predicting changes in channel depth and dimensions over time. This information is critical to the assessment of the available use period of the channel as a shallow draft transportation route into the future – a key component in the evaluation of alternative 2. The team utilized historic maintenance dredging data collected over the life of the channel to estimate the rate of infilling and the duration that the channel would be available for use by vessels drafting less than 12 feet. According to the data, the sound reach of the channel is estimated to shoal to less than 12 feet in about 2014. Uncertainty associated with the estimate centers on the frequency of tropical storms and hurricanes passing through the project area. Storms generate waves and shift bottom sediments resulting in channel shoaling. The team assessment includes

documenting the assumptions associated with the data and confidence is gained because the data used reflects a full project life period of record keeping. Nonetheless the variability in tropical storm activity raises some uncertainty in the estimate on both the upper and lower ends. Stated more directly a tropical storm or storms could impact the project area in any year rendering the channel inaccessible to shallow draft vessels. The team also noted that the project area might not be impacted by a storm event for a period beyond 2014 resulting in a longer period of shallow draft access.

Under certain conditions the MRGO channel is occasionally used as an alternative by-pass route around the IHNC Lock. This use is generally limited to periods of heavy congestion, unexpected maintenance closures or scheduled prolonged maintenance work on the IHNC Lock. Information about the frequency of shallow draft utilization under these scenarios is critical to assessing alternatives that would allow for continued shallow draft access on the MRGO. Information on the use of the MRGO in these events was culled from the waterborne commerce statistics. The data was analyzed and usage estimates were developed (including assumptions) and documented in the stakeholder engagements and in the report. The basic assumption is that vessel operators would wait at moorings to pass through the lock rather than opt to use the MRGO-Mississippi River by-pass route as long as the wait time was less than or equal to the added time needed to complete the alternative route. Based upon the trip duration for the by-pass route the trigger period is approximately three days. At the three day point some operators may choose to precede to by-pass the congested or closed lock. The team presented the information to navigation industry trade groups in several venues and the assumption was not challenged.

The MRGO project delivery team managed risk by collecting the best available data for use in the study and clearly documenting the assumptions and shortfalls of the information. In addition, the team worked to communicate the data utilized to stakeholders so that interested parties clearly understood the limitations of the analysis. Further parties were offered the opportunity to provide additional data to support the alternatives analysis conducted. The team also worked with Operations Managers for the IHNC Lock to identify maintenance and repair actions that could further minimize the likelihood of prolonged closures of the structure. These actions could be sequenced prior to implementation of the recommended plan in order to bring the lock to the most reliable operations status before the loss of the MRGO as a by-pass route based on funding availability.

2.5.3 Description of Alternatives Evaluated in Detail

2.5.3.1 Future Without De-authorization

The existing MRGO Project completed construction in 1968 at the authorized depth and width. Since construction, the project has been maintained at various depths and widths. For the past few years, the Inland Reach, the Sound Reach and Bar Channel have not been dredged to full dimensions. Rather, the channel has been maintained for one-way traffic only. Due to shoaling the current controlling depth is approximately 22 feet. However, to determine whether it is economically feasible to maintain the project and

evaluate the environmental impacts for various levels of maintenance including closure, the future without de-authorization is assumed to be a project maintained at the authorized dimensions. The Future Without condition is equivalent to the no-action alternative. All alternatives will be compared to this future condition.

When the Inland Reach is dredged to its full, authorized dimensions, all material from the Inland Reach would be placed in upland disposal areas because of difficulties in finding marsh creation sites unencumbered with oyster leases. Based upon previous practices, under the future without project scenario, material from the initial dredging of channel miles 27 to 23 would create approximately 157 acres of wetlands adjacent to and behind the north jetty. Material from the initial dredging of channel miles 23 to 14 would be placed behind the south jetty, creating approximately 1,297 acres of marsh. From channel miles 14 to 3.4, material would be placed at unprotected sites in the sound and it is unlikely that any marsh created would last more than a year because of exposure to open bay waves. Material from the initial dredging of channel miles 3.4 to -4 would be placed on Breton Island to create approximately 215 acres of marsh and barrier island habitat (see Appendix G).

Following the restoration of the channel to its full dimensions, it would be maintained at a 500-foot bottom width for the 50-year period of analysis. A 600-foot bottom width would be maintained within the Bar Channel. However, future maintenance operations would depend on funding availability. Material from the Inland Reach would again be placed in upland confined disposal areas. From 1985 to 2004, while maintaining miles 27 to 3.4 to a 500-foot width, an average of approximately 17 acres was created each year behind the jetties. From 1993 to 2005, material between miles 3.4 to -4 was placed either at the feeder berm or just off Breton Island, creating an average of approximately 21 acres per year. It is assumed that these acreages would continue to be created for 50 years in the future without de-authorization (see Appendix G).

Approximately 2,702 acres of marsh would be created in 50 years. At the same time 5,045 acres of marsh could be lost due to erosion. Thus, the estimated net loss is 2,343 acres over 50 years (see Appendix G).

2.5.3.2 Alternative 1 – Construct a Total Closure Structure across the MRGO Near Bayou La Loutre Immediately

This alternative was developed to de-authorize the MRGO channel from Mile 60 at the southern bank of the GIWW to the Gulf of Mexico, by eliminating deep-draft and shallow-draft navigation while protecting the environment from further negative impacts associated with erosion and increased salinity. It achieves positive closure of the MRGO channel, thereby eliminating the possibility of attempted through navigation upon de-authorization.

Under this alternative the MRGO channel would be de-authorized for navigation from mile 60 at the southern bank of the GIWW to the Gulf of Mexico. No additional funds would be used to maintain any channel on the MRGO between the GIWW and the Gulf of Mexico. A total closure structure would be constructed just south of Bayou La Loutre

and would tie in with the southern Bayou La Loutre Ridge to totally block the MRGO channel (see Figure 2.1). The structure would not allow passage of vessels traveling the length of the MRGO. Aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard. Existing bank stabilization features and jetties would be de-authorized, but left in place.

The total closure structure would be made of rock and built in one construction effort of 170 days. The structure would be 25-30 feet wide on the top and its elevation would be + 5 feet MLG. Side slopes of the structure would be 1 V on 2.5 H and the bottom would be 250-275 feet wide. The estimated total project construction cost of the total closure structure is $17,451,000 based on October 2006 price levels (see Table 2.1). Estimated average OMRR&R cost for the total closure structure is $136,000 per year. Average annual net economic benefits are $7.8 million. Total project costs would be shared as follows: construction costs at 100% Federal; LERRDs at 100% non-Federal; and OMRR&R at 100% non-Federal.

Table 2.1 Alternative 1 Project Construction Costs

Alternative 1 Project Construction Costs
(October 2006 Price Levels)

Construction Items	**Alternative 1 Cost ($)**
Mobilization and Demobilization	66,100
Stone Placement - Channel Proper	10,494,000
Stone Placement - Overbank Tie-Ins	243,000
Clearing and Grubbing (Overbank)	16,200
Engineering and Design	743,850
Construction Management	1,082,000
Real Estate	1,401,000
Removal of Aids to Navigation	700,000
Contingencies (25%)	2,704,850
Total Project Construction Costs	**17,451,000**

2.5.3.3 Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre (phased construction would begin with a weir and be completed with a total closure structure)

This alternative was developed to de-authorize the MRGO channel from Mile 60 at the southern bank of the GIWW to the Gulf of Mexico, as a variation of Alternative 1 that would allow a period of "free" shallow-draft navigation benefits while ultimately achieving the goal of positive closure of the MRGO channel. The "free" shallow-draft benefits are derived from a period ending around 2014 during which the channel could accommodate shallow-draft without expenditures on maintenance dredging; however, during this period, the channel would not be Federally authorized, operated, or maintained. Additionally, under this alternative, while erosion and saltwater intrusion are reduced, these impacts continue on a limited basis until the total closure structure is completed.

Under this alternative, the MRGO channel would be de-authorized for navigation from mile 60 at the southern bank of the GIWW to the Gulf of Mexico. No additional funds would be used to maintain any channel on the MRGO between the GIWW and the Gulf of Mexico. A total closure structure would be constructed just south of Bayou La Loutre using sequenced construction and would tie in with the southern Bayou La Loutre Ridge to totally block the MRGO channel. The total closure structure would be constructed in two phases. Aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard. Existing bank stabilization features and jetties would be de-authorized, but left in place.

The first phase would construct a rock closure containing a weir 125-feet wide by 14 feet deep. (Note: The weir would be set at 14 feet depth to allow safe passage of 12-foot draft vessels—providing a 2-foot keel/hull clearance over the structure). It is possible that guide walls and dolphin cells would be needed on both sides of the weir to funnel marine traffic through the weir. Design optimization, including possible physical modeling, would be required to assess hydraulic performance and ensure safe navigability through such a structure. The estimated total project construction cost of phase I is $16,608,145 based on October 2006 price levels. Construction of the first phase, the rock weir, would take an estimated 150 days.

Once complete, the first phase of construction would allow the passage of vessels with a draft of 12 feet or less. Under this phase, commercial and recreational vessels with a draft less than 12-feet could still use the MRGO until the channel filled in to a depth of 12 feet. The depth of the channel would be monitored. Once any reach filled in to a depth of less than 12 feet, Phase II construction would begin. It is estimated that some reaches of the MRGO would become impassible to vessels with greater than 12-foot draft in approximately 2014. The date of 2014 is the best engineering estimate of when any portion of the channel would shoal to a depth less than 12 feet. This shoaling could occur at any time if a tropical storm or hurricane passes over the sound area. If there are no such disturbances, it could be sometime after 2014 that the channel depth would be reduced to 12 feet or less.

The second phase of construction would complete the total rock closure by filling the weir opening with rock. The completed structure would not allow passage of any vessels traveling the length of the MRGO. The elevation of the closure would be + 5 feet MLG. The estimated total project construction cost for the second phase is $1,107,485 based on October 2006 price levels.

The estimated total project construction cost for Alternative 2 is $17,715,630 (see Table 2.2). Estimated average OMRR&R cost for Alternative 2 is $133,800 per year. The average annual net economic benefits for this phased total closure structure are $8.1 million. Total project costs would be shared as follows: construction costs at 100% Federal; LERRDs at 100% non-Federal; and OMRR&R at 100% non-Federal.

2.5.3.4 Alternative 3 – Cease All MRGO Operations and Maintenance Dredging Activities Immediately

This alternative was developed to de-authorize the MRGO channel from Mile 60 at the southern bank of the GIWW to the Gulf of Mexico, in the least costly and most expedient manner; however, it does not protect against continued erosion and saltwater intrusion. In addition, it does not achieve positive closure of the MRGO channel, therefore, the possibility of attempted through navigation is not eliminated upon de-authorization under this alternative. Because the channel would remain open, potential issues surrounding vessel damage, insurability, and safety exist; however, because the Federal government is not recommending the continued use of the channel following de-authorization, these potential issues were not quantified. It is anticipated that some vessels will continue to use the channel under this alternative despite deteriorated channel conditions because under current conditions both deep- and shallow-draft vessels utilize the channel which has not been maintained since Hurricane Katrina. For example, the controlling depth of the channel is 22-feet and many aids to navigation were damaged or destroyed by Hurricane Katrina and have not been replaced due to the uncertainty of the future of the channel (see Section 3.2.12). Discussions with stakeholders in the navigation industry (such as pilots, shipping companies, the Port of New Orleans, dock operators, industry trade groups) and with the USCG indicate that vessels are likely to continue to navigate the MRGO channel until depth conditions become inadequate. This applies to both deep- and shallow-draft vessels. After de-authorization, relic aids to navigation would be removed through coordination with the USCG, but navigation is likely to continue under this alternative subject to future channel shoaling.

Under this alternative, the MRGO channel would be de-authorized for navigation from mile 60 at the southern bank of the GIWW to the Gulf of Mexico. No additional funds would be used to maintain any channel on the MRGO between the GIWW and the Gulf of Mexico. There would be no construction costs, except 1) aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard and 2) the USACE would dispose of some existing disposal and channel easements. Existing bank stabilization features and jetties would be de-authorized, but left in place. Under this alternative, commercial and recreational shallow-draft vessels could still use the MRGO until the channel filled in to a depth that prohibited their navigation. It is estimated that some reaches of the MRGO would become impassible to vessels greater than 12-foot draft in approximately 2014. This year has been used for analyses under this alternative although, a tropical storm or hurricane could cause portions of the channel to shoal much sooner. Total project construction costs are estimated to be $825,000 based on October 2006 price levels (see Table 2.3). Average annual net economic benefits are estimated to be $9.1 million. Total project costs would be shared as follows: construction costs at 100% Federal; LERRDs at 100% non-Federal; and OMRR&R at 100% non-Federal.

Table 2.2 Alternative 2 Project Construction Costs

Alternative 2 Project Construction Costs
(October 2006 Price Levels)

Construction Items	**Alternative 1 Cost ($)**
Phase I	
Mobilization and Demobilization	66,100
Stone Placement	10,143,000
Clearing and Grubbing	16,200
Engineering and Design	702,990
Construction Management	1,022,530
Real Estate	1,401,000
Removal of Aids to Navigation	700,000
Contingencies (25%)	2,556,325
Phase I Subtotal	**16,608,145**
Mobilization and Demobilization	66,100
Stone Placement	661,320
Engineering and Design	114,555
Construction Management	83,655
Contingencies (25%)	181,855
Phase II Subtotal	**1,107,485**
Total Project Construction Costs	**17,715,630**

Figure 2.1 – Bayou La Loutre Ridge, site of the Total Closure Structure

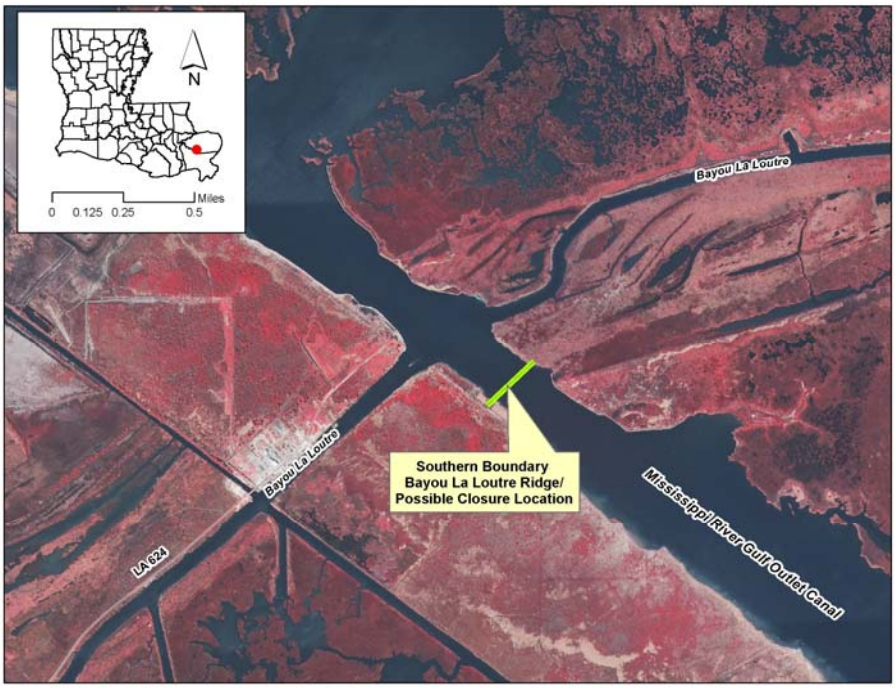


Table 2.3 Alternative 3 Project Construction Costs

Alternative 3 Project Construction Costs
(October 2006 Price Levels)

Construction Items	Alternative 1 Cost ($)
Real Estate	125,000
Removal of Aids to Navigation	700,000
Total Project Construction Costs	**825,000**

2.6 COMPARISON OF ALTERNATIVES BASED ON FOUR CRITERIA IN PRINCIPLES AND GUIDELINES

In accordance with ER 1105-2-100, alternatives evaluated in detail were also evaluated and compared based on the following four criteria: 1) completeness, 2) effectiveness, 3) efficiency, and 4) acceptability, which are described at the beginning of Section 2. The following paragraphs describe the alternatives in terms of these criteria. This comparison is summarized in Table 2.5.

2.6.1 Completeness

2.6.1.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

This plan is not complete. It assumes that the channel would be dredged to its authorized width and depth. However, neither deep-draft nor shallow-draft is economically justified. It requires significant investment to protect the environment and does not account for any other social effects.

2.6.1.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Alternative 1 is the most complete plan because it provides for all the necessary investments to physically close the MRGO to navigation from the GIWW to the Gulf of Mexico as part of de-authorization. Present channel conditions accommodate navigation up to a 22 foot draft. This plan eliminates any possibility of through navigation after de-authorization. The closure structure is not part of a hurricane protection project. The plan reasonably maximizes economic benefits, is the most effective in protecting the environment, and considers other social effects.

2.6.1.3 Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre

Alternative 2 is a slightly less complete plan than Alternative 1 because it is less compatible with LACPR alternatives aimed at the distribution of diverted Mississippi River water throughout the Biloxi Marsh. It eventually provides for all the necessary investments to physically close the MRGO to navigation from the GIWW to the Gulf of Mexico as part of de-authorization. However, it allows shallow-draft navigation until about 2014 without expenditures on maintenance dredging. There will be no navigation

aids on the de-authorized channel. After about 2014, this alternative eliminates the possibility of through navigation. The phased closure structure is not part of a hurricane protection project. This plan reasonably maximizes economic benefits, is less effective in protecting the environment up to 2014, and is not fully responsive to other social effects.

2.6.1.4 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

Alternative 3 is not a complete plan. It provides none of the necessary investments to physically close the MRGO to navigation from the GIWW to the Gulf of Mexico. The plan allows possibility of through navigation after de-authorization. There will be no navigation aids on the de-authorized channel. Present channel conditions accommodate navigation up to a 22 foot draft. Vessels may attempt to navigate the channel after it is de-authorized. This plan provides the maximum economic benefits, but does not address environmental or social effects.

2.6.2 Effectiveness

2.6.2.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

This is the least effective alternative because it does not de-authorize deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico as directed by Public Law 109-234.

2.6.2.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

This alternative is effective because it de-authorizes deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico as directed by Public Law 109-234.

2.6.2.3 Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre

This alternative is effective because it de-authorizes deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico as directed by Public Law 109-234.

2.6.2.4 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

This alternative is effective because it de-authorizes deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico as directed by Public Law 109-234.

2.6.3 Efficiency

Cost and benefit information used to evaluate the efficiency of each alternative is displayed in Table 2.4.

2.6.3.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

The future without de-authorization is the least efficient alternative. It is estimated that this plan produces a net economic loss to the nation. With the average annual cost to maintain the authorized channel to be approximately $12.5 million and the average

annual benefit to navigation (both deep-draft and shallow-draft traffic) to be approximately $3.7 million, plus the cost to return the channel to authorized dimensions of $130 million, the corresponding B/C ratio is 0.17 to 1. The annual maintenance cost used in this assessment is based upon appropriations received in the past. As noted earlier, since about 1998 this funding level has only been adequate for the maintenance of a one-way channel not the fully authorized dimensions of the MRGO. Maintenance dredging to provide the full authorized dimensions would require higher levels of annual O&M funding. More significantly, a major dredging event to restore the post-Katrina channel to authorized dimensions has been estimated to exceed $130 million. In addition, future annual O&M costs do not reflect the periodic need for emergency supplemental funds required for dredging after tropical storms and hurricanes.

2.6.3.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

This plan will produce a net economic benefit, however when compared to alternative 2 and alternative 3, it produces the fewest average annual net economic benefits ($7.8 million) and the smallest B/C ratio of 2.6 to 1, because of the cost of constructing the closure structure and the loss of all navigation benefits once the closure structure is installed.

2.6.3.3 Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre

When compared to alternative 1, this plan will produce a slightly better net economic benefit. This is due to the fact that shallow draft traffic may still be able to use the channel for a period of time (until the channel is closed due to shoaling in about 2014) once the channel is de-authorized and construction of a full closure structure can be delayed. However, when compared to alternative 3, it is less efficient because of the cost of constructing a closure structure. The average annual net economic benefit for this alternative is estimated to be $8.1 million producing a B/C ratio of 2.8 to 1. Uncertainties regarding the rate of future channel shoaling greatly effect the confidence in this B/C ratio.

2.6.4.4 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

When compared to alternative 1 and 2, this plan produces the highest average annual net economic benefit ($9.1 million) and the highest B/C ratio (3.7 to 1). This is due to the fact that shallow draft traffic may still be able to use the channel for a period of time (until the channel is closed due to shoaling in about 2014, as is the case with alternative 2), and because it requires minimal investment. Uncertainties regarding the rate of future channel shoaling greatly effect the confidence in this B/C ratio.

2.6.4 Acceptability

ER 1105-2-100 discusses acceptability as the workability and viability of the alternative plan with respect to acceptance by Federal and non-Federal entities and the public and compatibility with existing laws, regulations, and public policies. Two primary dimensions on acceptability are implementability and satisfaction.

1) Implementability means that the alternative is feasible from technical, environmental, economic, financial, political, legal, institutional, and social perspectives. If an alternative is not feasible due to any of these factors, then it can not be implemented, and therefore is not acceptable. An infeasible plan should not be carried forward for further consideration. 2) The second dimension to acceptability is the satisfaction that a particular plan brings to government entities and the public. The extent to which a plan is welcome or satisfactory is a qualitative judgment. Discussions as to the degree of support (or lack thereof) enjoyed by particular alternatives from a community, state Department of Natural Resources, Ducks Unlimited, or other national or regional organizations, for example, are additional pieces of information that can help planners evaluate whether to carry forward or screen out alternative plans.

Table 2.4 Average Annual Benefits and Costs by Alternative

Average Annual Benefits and Costs by Alternative
(October 2006 Price Level, 50-Year Period of Analysis, 4.875 Percent Discount Rate)

	Future Without De-authorization	Alternative 1	Alternative 2	Alternative 3
	Cost ($)	**Cost ($)**	**Cost ($)**	**Cost ($)**
Investment Costs				
Total Project Construction Costs	130,445,000	17,451,000	17,715,630	825,000
Interest During Construction	6,360,000	307,000	290,000	18,700
Total Investment Cost	**136,805,000**	**17,758,000**	**18,005,600**	**843,700**
Average Annual Costs				
Interest and Amortization of Initial Investment	6,682,000	894,200	893,900	42,300
Deep-Draft Transportation Cost		2,500,000	2,500,000	2,500,000
Shallow-Draft Transportation Cost		1,200,000	871,500	871,400
OMRR&R	12,500,000	136,000	133,800	
Total Average Annual Costs	**19,182,000**	**4,730,200**	**4,399,200**	**3,413,700**
Average Annual Benefits	**3,700,000**	**$12,500,000**	**$12,500,000**	**$12,500,000**
Net Annual Benefits	**-15,482,000**	**$7,769,800**	**$8,100,800**	**$9,086,300**
Benefit-Cost Ratio	**0.19 to 1**	**2.6 to 1**	**2.8 to 1**	**3.7 to 1**
Benefit-Cost Ratio (computed at 7%)*	**0.17 to 1**	**2.5 to 1**	**2.7 to 1**	**3.7 to 1**

*Per Executive Order 12893

2.6.4.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Maintaining the MRGO to the authorized depth and width would clearly fail the test of implementability. An overview and comparison of the final alternatives against the four P&G criteria is provided in Table 2.5.

The Future Without De-authorization is not acceptable because it is not feasible in terms of economic, financial, political, or social factors. In addition, it has the highest

environmental impacts. This plan is least compatible with comprehensive ecosystem restoration strategies It does not restore the Bayou La Loutre Ridge which was a hydrologic barrier and a natural line of storm defense. The ridge protected marshes to north from rapid tidal exchanges. The ridge may remain open for 50 years. This plan would not reduce salinity in the Pontchartrain Basin north of Bayou La Loutre. Salinity might remain steady in the Middle Basin and could increase in the Lower Basin (Tate et al. 2002). With the future without de-authorization, beneficial use of dredged material would create 2,702 acres of marsh behind the jetties and on Breton Island. However, shoreline erosion would destroy 4,565 acres of marsh for a net loss of 2,343 acres of marsh. It is unlikely that sea turtles would be found in the Inland Reach. Turtles would continue to be taken in the Bar Channel during maintenance dredging and ship impacts. . The size and cost of any potential freshwater diversion projects would be the highest of any alternative. There would be greater marsh loss on the MRGO/Lake Borgne Landbridge and thus more resources would be required to protect and restore this landbridge. This scenario is also not acceptable to the State of Louisiana, area parish governments, adjacent landowners or several local and national environmental Non-Governmental Organizations. This alternative is not included in the local government, state government, and environmental organization plans for coastal Louisiana. For the above mentioned reasons, it is unacceptable and should not be implemented.

2.6.4.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Alternative 1 is the most politically feasible plan. The Louisiana Congressional delegation and local politicians strongly support a total closure. This plan is less economically feasible than alternative 3, but it has many other positive attributes. Alternative 1 is the most socially feasible plan. Citizens of St. Bernard, Orleans, Jefferson and St. Tammany Parishes, all affected by Katrina, generally believe that the MRGO is a “hurricane highway”, despite strong scientific data that demonstrates otherwise. Thus, the general citizenry of southeastern Louisiana is highly supportive of a positive closure. Numerous comments on the LEIS also favored at least one closure in the MRGO.

Alternative 1 is the most satisfactory to the State of Louisiana. The State of Louisiana has taken a number of significant actions related to the future of the MRGO and clearly identified its position on the de-authorization of the channel. Key pieces of information highlighting the state's position include:

1. A letter from the Governor calling for immediate closure of the MRGO. In a June 2006 letter Governor Blanco wrote General Riley regarding the MRGO stating "I write to unequivocally express the policy of this State regarding the future of the Mississippi River Gulf Outlet (MRGO) … my Advisory Commission on Coastal Protection, Restoration and Conservation has recommended the immediate closure of this channel." (see Appendix A).

2. The completion of a Master Plan for Coastal Protection and Restoration highlighting total closure of the MRGO. The State Master Plan calls for the

immediate closure of the MRGO. To quote, "Immediately construct a closure dam at Bayou LaLoutre …" The Master Plan was developed with intensive public input and was unanimously adopted by the Louisiana Legislature.

3. Passage of state appropriations in the current fiscal year dedicated to co-sponsoring MRGO closure. The Fiscal Year 08 State Annual Plan includes funds for the LERRDs associated with the proposed total closure structure.

4. Provision of a letter of interest in serving as the non-Federal sponsor. The State of Louisiana has expressed an understanding of the current law and administration policy regarding implementation of Federal water resources projects. In a letter of intent dated September 25, 2007, the Chair of the Coastal Protection and Restoration Authority of Louisiana (CPRA) expressed the State of Louisiana's interest in sharing the costs of implementing the recommendations of this report ". . . dependent upon the nature of the local cooperation requirements and their specific costs" (see Appendix O).

5. Self-certification of the non-Federal sponsor's financial capability. The state certified its financial capability to serve as the local cost share sponsor for the MRGO closure plan. (see Attachment 1).

6. Participation in the project Civil Works Review Board and expression of strong commitment and support for the recommended plan.

7. The State of Louisiana has committed to provide a revised letter of assurance that clearly articulates their desire to serve as the non-Federal sponsor. A letter meeting this requirement is anticipated from the state in November 2007.

The closure is also highly satisfactory to local citizens and citizens of other parts of the country as evidenced by public meeting comments and comments on the Draft Report/LEIS. Many non-governmental organizations (local and national) find the closure highly satisfactory when compared to the other alternatives. Alternative 1 appears to be highly satisfactory to adjacent landowners when compared to the other alternatives.

Alternative 1 is highly unsatisfactory to navigation interests because they lose deep-draft access to infrastructure on the IHNC and the GIWW until the IHNC Lock is replaced. They have also expressed desire for an alternative route around the IHNC Lock. The team has recognized these comments and worked diligently to seek resolution. However, in the end, no reasonable alternatives were identified to satisfy concerns regarding the low probability of impacts to the shallow draft industry. No cost effective shallow draft alternatives are likely to exist based on the low level of benefits and the rare occurrence of using the MRGO as a by-pass around the IHNC Lock.

Thus, it can be concluded that Alternative 1 is clearly the most acceptable plan for MRGO de-authorization based on both feasibility and satisfaction.

Construction of a rock closure structure at Bayou La Loutre is the most acceptable plan across a range of additional goals and objectives. These include de-authorizing the Federal navigation channel, the highest level of environmental benefits, and compatibility with LACPR alternatives. This plan would immediately restore the portion of ridge cut by MRGO. Restoration could allow wildlife to cross the ridge and return tidal flow to pre-MRGO conditions. This plan is likely to immediately reduce salinity north of the closure structure. The MRGO/Lake Borgne Landbridge could change from the saline marsh it is now to a brackish marsh type. More intermediate marsh and cypress could occur in Central Wetlands. Once in place, the closure structure might quickly reduce size of H/A Zone in Lake Pontchartrain. These could then also reduce H-A Zone. The plan is estimated to prevent the potential loss of a significant percent of the 2,343 net acres of marsh estimated to be lost under the future without de-authorization. The closure structure would remove deep-draft navigation and could allow sea turtles to reoccupy Inland Reach.

2.6.4.3 Alternative 2 – Phased Construction of a Total Closure Structure Across the MRGO Near Bayou La Loutre

Alternative 2 is less politically feasible than Alternative 1 – the Louisiana political delegation and local politicians favor an immediate closure. Alternative 2 is more economically feasible than Alternative 1. It is less socially feasible than Alternative 1 because citizens have expressed a desire for immediate closure. Alternative 2 is less satisfactory than Alternative 1 to the State of Louisiana, local parishes, adjacent landowners and various NGOs. Alternative 2 is slightly more satisfactory to navigation interests than alternative 1 because it allows shallow-draft navigation until about 2014. In conclusion, Alternative 2 is less feasible and satisfactory than Alternative 1. This plan is not advisable by the USCG, and it is unacceptable to the shallow-draft navigation industry because of uncertainties surrounding future channel shoaling. This alternative is not consistent with the State of Louisiana's Master Plan for Coastal Protection and Restoration and it does not satisfy the expressed goals and interests of local governments and several local and national environmental Non-Governmental Organizations. This alternative is not included in the local governments, state government, and environmental organization plans for coastal Louisiana.

This alternative is less acceptable than Alternative 1 for additional reasons. The Bayou La Loutre Ridge would not be restored until about 2014. There would be no ridge restoration benefits during this period, then benefits for a ridge would be the same as Alternative 1. This plan would provide some immediate salinity reduction north of the notched structure, but not as much as Alternative 1. The return of marsh to a less saline habitat type on the MRGO/Lake Borgne Landbridge and in the Central Wetlands is unlikely to occur until about 2014. Then when the closure structure is completed, Alternative 2 would have same benefits as Alternative 1. Benefits of reducing the H/A Zone in Lake Pontchartrain would be same as those for Alternative 1. There would be slightly less marsh loss prevented than with Alternative 1 due to possibility of shallow-draft navigation until about 2014. The phased closure structure would remove deep-draft navigation and could allow sea turtles to reoccupy Inland Reach. This alternative would be less compatible than Alternative 1 until about 2014 in relation to ecosystem

restoration, the freshwater diversion at Violet would have to be larger and restoration of the landbridge would be more costly.

2.6.4.4 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

Alternative 3 may maximize economic benefits better than Alternative 1, but as indicated above, it clearly fails the test of implementability from political and social perspectives. Thus, it is unacceptable and should not be implemented. This plan is not advisable by the USCG, and it is unacceptable to the shallow-draft navigation industry because of uncertainties surrounding future channel shoaling. Table 2.5 provides an overview and comparison of alternatives against each of the four P&G criteria. This alternative is not acceptable because it is not feasible in terms of political or social considerations. This alternative has higher environmental impacts to area wetlands and estuarine salinity than Alternatives 1&2. This plan does not meet the expressed goals of local government, landowners, or environmental NGOs. In addition, the alternative is not consistent with the State of Louisiana's Master Plan for Coastal Protection and Restoration. The state has indicated that this alternative (along with the Future Without De-authorization and Alternative 2) is deemed inconsistent with the Louisiana Coastal Zone Management Plan as approved by the National Oceanic and Atmospheric Administration (U.S. Department of Commerce). This alternative is not included in the local governments, state government, and environmental organization plans for coastal Louisiana.

This plan is less acceptable than Alternative 1 or 2 for additional reasons. Under this alternative the Bayou La Loutre Ridge would never be restored and would remain open for the 50 year period of analysis and beyond. There would be essentially no salinity reduction for many years. Salinity might increase in Lower Basin as per Tate et al. Marsh types would probably remain as at present and not become less saline. Changes in H-A Zone are unlikely until USACE constructs measures to reduce storm surge into IHNC. It is possible that deep-draft vessels might use the channel longer than with Alternative 2. Thus, there could be a higher percentage of the estimated 2,343-acre marsh loss than Alternative 2. Once deep-draft vessels ceased to use the de-authorized channel, sea turtles could reoccupy Inland Reach. This Alternative would be less compatible for comprehensive ecosystem restoration than Alternative 2 but more compatible than the future without de-authorization. Cost of a potential Violet Canal freshwater diversion and restoration of the landbridge would fall between Alternative 2 and the future without de-authorization.

2.7 ALTERNATIVE 2 ELIMINATED FROM FURTHER EVALUATION

Alternative 2 was eliminated from further evaluation based on the comparison of alternatives based on the four criteria in principles and guidelines presented in Section 2.6 and the assessment of planning risk and uncertainty presented in Section 2.5.2. Therefore, Alternative 2 was not carried forward for the evaluation and comparison of environmental consequences presented in Section 3.

Alternative 2 was eliminated from further evaluation because it was deemed to be less complete, effective, and acceptable than Alternative 1 and less efficient than Alternative 3. Additionally, the benefits that may be derived from shallow-draft navigation usage before 2014 under Alternative 2 are speculative in nature because of the planning risk and uncertainty surrounding the potential rate of future MRGO channel shoaling. Given the risk and uncertainty and the performance of the alternative when evaluated against the four criteria in principles and guidelines, Alternative 2 was eliminated from further evaluation.

Table 2.5 Comparison of Alternatives Based on Four Criteria in Principles and Guidelines

CRITERIA	FUTURE WITHOUT DE-AUTHORIZATION	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3
Completeness	Not a complete plan. It does not meet the study objective of de-authorizing the channel. Assumes channel is dredged to authorized dimensions (recognizing appropriations limits). However, neither deep-draft nor shallow-draft is economically justified.	Most complete plan; it provides positive closure of de-authorized channel immediately. Plan eliminates possibility of through navigation after de-authorization.	Second most complete plan; it de-authorizes the channel but allows shallow-draft navigation until about 2014, when closure structure is completed.	Marginally complete plan; it de-authorizes the channel but does not physically close the de-authorized channel. Plan allows possibility of through navigation after de-authorization[7]. Will be no navigation aids on de-authorized channel.
Effectiveness	Least effective because does not de-authorize the channel.	Effective at meeting the requirement of de-authorizing the project.	Effective at meeting the requirement of de-authorizing the project.	Effective at meeting the requirement of de-authorizing the project.
Efficiency	Most costly and least benefits. B/C is 0.17 to 1	Third most costly. B/C is 2.5 to 1	Second most costly. B/C is 2.7 to 1	Least Costly. B/C is 3.7 to 1
Acceptability	**Not acceptable** (see details below).	Most acceptable (see details below).	Partially acceptable (see details below)	**Not acceptable** (see details below).
Technically feasible	Yes	Yes	Yes	Yes
Environmental Acceptability	Not environmentally acceptable	Highly environmentally acceptable	Less environmentally acceptable than Alt. 1	Not environmentally acceptable

Salinity reduction	Salinity in the Pontchartrain Basin would remain changed from historic conditions (Salinity should stay stable in Mid-Basin and might increase in Lower Basin as land loss from various causes continues). (see Section 3 and Appendix D). Habitat types are expected to generally remain as they are at present.	Slightly reduced salinity is expected throughout the project area soon after completion of closure structure (modeling indicates greatest reduction could be at Alluvial City – 6.0-6.6 ppt; salinity stratification north of the structure would be reduced; it is expected that the size of the H-A zone in Lake Pontchartrain could shrink). (see Section 3 and Appendix D). MRGO/Lake Borgne Landbridge could return to brackish marsh. More intermediate marsh and cypress could occur in Central Wetlands.	Fewer salinity improvements prior to completion of closure structure in about 2014. (see Section 3 and Appendix D). Marsh change on Landbridge and in Central Wetlands unlikely to occur until about 2014. Then when closure completed, Alt. 2 would have same benefits as Alt. 1. H-A Zone same as Alt. 1.	Salinity is unlikely to become lower for several years until much of the channel shoals. (see Section 3 and Appendix D). Salinity might increase in Lower Basin. Marsh types should remain as at present. Change in H-A Zone unlikely until USACE constructs measures to reduce storm surge into IHNC.
Marsh loss	Beneficial use could create 2,702 acres of marsh; erosion would likely destroy 4,565 acres of marsh for a net loss over 50 years that could be of 2,343 acres. (see Section 3 and	Marsh loss could be decreased by a significant percentage of the 2,343 acre net loss of the future without. (see Section 3 and Appendix G).	Slightly less marsh loss prevented than under Alt.1 because shallow-draft navigation could use the channel until about 2014. (see Section 3 and Appendix G).	More marsh loss than Alternative 1, but probably significantly less than future without. (see Section 3 and Appendix G).

	Appendix G).			
Endangered species (sea turtles)	Unlikely that sea turtles would be found in Inland Reach. Turtles would continue be taken in the Bar Channel.	Could allow sea turtles to reoccupy Inland Reach. [1]	Could allow sea turtles to reoccupy Inland Reach. [1]	Sea turtles could reoccupy Inland Reach once deep/large shallow-draft vessels ceased using channel
Restores Bayou La Loutre Ridge	Ridge was a hydrologic barrier and a natural Line of Defense that protected marshes to north. Ridge may remain open for 50 years.	Immediately restores ridge function cut by MRGO. Restoration could allow wildlife to cross the MRGO, reduce salinity (see below) and return tidal flow to pre-MRGO conditions.	Ridge function not fully restored until about 2014. No restoration benefits during that period, then same as Alt. 1.	Ridge function never restored, MRGO would remain an open connection from the Gulf to Lake Borgne for 50 years.
Economically feasible	No	Yes, see efficiency	Yes, see efficiency	Yes, see efficiency
Financially feasible	**No**	Yes	Yes	Yes
Politically feasible	**No**	Yes, highly	Less politically feasible than Alt. 1.	**No**[5]
Compatibility with non-Federal plans for Coastal Louisiana	This alternative is not included in the local government, state government, and environmental organization plans for coastal Louisiana mentioned under Alt. 1.	The channel closure is included in a number of local government, state government, and environmental organization plans for coastal Louisiana (see Section 2.6.2.2).	This alternative is not included in the local government, state government, and environmental organization plans for coastal Louisiana mentioned under Alt. 1.	This alternative is not included in the local government, state government, and environmental organization plans for coastal Louisiana mentioned under Alt. 1.
Compatibility with USACE initiatives (LACPR, LCA,	Least compatible with comprehensive ecosystem restoration.	Most compatible with comprehensive ecosystem restoration.	This alternative would be less compatible than Alternative 1 until about	Less compatible for comprehensive ecosystem restoration

CWPPRA Restoration Plan)	Specifically, the size and cost of any potential freshwater diversion projects would be the highest of any alternative and there would be greater marsh loss on the MRGO/Lake Borgne Landbridge and thus more resources would be required to protect and restore this landbridge.	Specifically, consistent and supportive of many previous assessments of MRGO environmental solutions including the Louisiana Coastal Area Ecosystem Restoration Plan, CWPPRA Restoration Plan, and the elements under consideration for the LACPR study; the size and cost of a freshwater diversion at the Violet Canal could be the smallest compared to other alternatives; and restoration of the MRGO/Lake Borgne Landbridge would be the least costly.	2014 in relation to ecosystem restoration. Specifically, a freshwater diversion at Violet Canal would have to be larger and restoration of the landbridge would be more costly.	than Alt. 2 but more compatible than future without de-authorization. Cost of potential Violet Canal freshwater diversion and restoration of the landbridge would fall between Alternative 2 and the future without de-authorization.
Satisfactory to State	Highly unsatisfactory and inconsistent with State Master Plan.	Highly satisfactory and consistent with the State Master Plan.	Marginally satisfactory and inconsistent with State Master Plan until 2014.	Highly unsatisfactory and inconsistent with State Master Plan.
Legally feasible	Yes	Yes	Yes	Yes
Institutionally feasible	Yes	Yes	Yes	Yes
Socially feasible[6]	**No**	Yes, highly	Yes, but less feasible than Alt. 1.	**No**[5]
Satisfactory to local parishes[2]	Highly unsatisfactory	Highly satisfactory compared to other	Less satisfactory than Alt. 1.	Highly unsatisfactory

		alternatives and future without.		
Satisfactory to adjacent landowners	Highly unsatisfactory	Highly satisfactory compared to other alternatives and future without.	Less satisfactory than Alt. 1.	Does not satisfy expressed concerns.
Satisfactory to various non-governmental organizations's[3]	Highly unsatisfactory	Highly satisfactory compared to other alternatives and future without.	Less satisfactory than Alt. 1.	Highly unsatisfactory
Satisfactory to navigation interests[4]	Satisfies some interests in the industry that expressed support for restoring coastal Louisiana while maintaining shallow draft alternative route.	Highly unsatisfactory because feasible shallow draft alternate route not available.	Unsatisfactory because feasible shallow draft alternate route only available until 2014.	Unsatisfactory because alternate route not available after about 2014.

[1] National Marine Fisheries Service letter dated September 14, 2007
[2] St. Bernard, Orleans, Jefferson, St. Tammany
[3] Coalition to Restore Coastal Louisiana, Lake Pontchartrain Basin Foundation, Environmental Defense, National Audubon Society, National Wildlife Federation, Louisiana Wildlife Federation, American Rivers, Gulf Restoration Network, levees.org
[4] Port of New Orleans, Shell, CITGO, Soluta, U.S. Coast Guard, Rhodia, Lonestar, Gulf States Maritime, Gulf Intracoastal Canal Assn., American Waterway Operators, Kirby Corp, Ed Peterson
[5] "Implementability means that the alternative is feasible from technical, environmental, economic, financial, political, legal, institutional, and social perspectives. If it is not feasible due to any of these factors, then it can not be implemented, and therefore is not acceptable. However, just because a plan is not the preferred plan of a non-Federal sponsor does not make it infeasible or unacceptable *ipso facto"* (ER 1105-2-100 E3. a(4)(a)(1).
[6] Information on social feasibility was gathered from a number of public meetings and feedback from stakeholders (see Section 4).
[7] Discussions with stakeholders in the navigation industry (such as pilots, shipping companies, the Port of New Orleans, dock operators, industry trade groups) and with the USCG indicate that vessels are likely to continue to navigate the MRGO channel until depth conditions become inadequate for ocean vessel transits. Shallow draft vessels are also likely to continue to use the channel as long as adequate depth remains for their navigation purposes. Many aids to navigation were damaged or destroyed by hurricane Katrina and have not been replaced due to the uncertainty of the future of the channel. After de-authorization, relic aids to navigation would be removed through coordination with the USCG, but navigation is likely to continue unless the channel is physically blocked.

2.8 EVALUATION AND COMPARISON OF REMAINING ALTERNATIVES

The Future Without De-authorization, Alternative 1 and Alternative 3 were analyzed in Section 3 using comparable information to assess relative consequences to the environment. The impact of each alternative across a range of significant resources is presented in Table 3.10. The following text compares the Future Without De-Authorization, Alternative 1, and Alternative 3 relative to this assessment of environmental impacts. A comparison of total project construction costs and average annual benefits and costs for each alternative are presented in Table 2.4.

Under the Future Without De-authorization, it is anticipated that navigation use would return to pre-Katrina levels; however, it has been determined that this level of navigation use does not economically justify a continued Federal interest in the authorized Project. The Future Without De-authorization also results in net environmental losses. Approximately 2,702 acres of marsh could be created by beneficial use in 50 years, but, about 5,045 acres of marsh could be lost to wake and wave erosion. Thus there could be an estimated net loss of about 2,343 acres of marsh during the 50 year period of analysis. There would be no salinity reduction in the Pontchartrain Basin under the Future Without De-authorization and habitat types would remain as they are today. The "H-A Zone" in Lake Pontchartrain would continue to occur nearly every year. The Future Without De-authorization has little compatibility with other potential ecosystem restoration efforts, such as a freshwater diversion structure at Violet.

Alternative 1 provides a physical closure to eliminate attempted navigation on the channel after de-authorization and maximizes protection of the environment. In addition, compatible with the study authority (Section 1.2), Alternative 1 has the highest compatibility with other potential ecosystem restoration efforts being considered under LACPR, such as a freshwater diversion structure at Violet. Alternative 1 immediately closes the MRGO to all navigation, thereby eliminating potential through navigation which could occur prior to the channel shoaling in naturally. It yields the fewest average annual net economic benefits ($7.8 million) because all navigation benefits are lost as soon as the total closure structure is installed. Shallow-draft tows that use the MRGO as an alternate route when the IHNC is congested or unexpectedly closed could no longer do so. (Note: this cost is included in calculation of net economic benefits). There is the potential for erosion to increase along the banks of Bayou La Loutre and other waterways if vessels currently using the MRGO channel utilize the other waterways as alternative routes; however, although this is not quantifiable the positive impacts of the alternative far outweigh any impacts to alternative routes. Alternative 1 could prevent a significant percentage of the 2,343 net acres of marsh estimated to be lost over 50 years under the future without condition. Greater salinity reduction and vegetation change to historic habitat types is anticipated to occur over a larger area. It is estimated that there could be a reduction in the size of the “H-A zone” in Lake Pontchartrain. If authorized and funded, Alternative 1 could be built in one construction effort lasting an estimated 170 days.

Alternative 2 was eliminated from further evaluation.

Alternative 3 maximizes net economic benefits; however, it fails to reduce the negative environmental impacts associated with erosion and increased salinity since it does not provide a physical closure of the channel and therefore through navigation of the channel would be limited only by natural shoaling. Additionally, Alternative 3 is not as compatible with the ecosystem restoration goals of LACPR as Alternative 1. Alternative 3 yields the greatest average annual net economic benefits ($9.1 million) because it requires minimal investment and because shallow-draft navigation benefits would only be limited by natural shoaling within the channel. Alternative 3 has no construction costs, except 1) aids to navigation and channel markers would be removed at the discretion of the United States Coast Guard and 2) the USACE would dispose of some existing disposal and channel easements. This alternative could be implemented almost immediately after Congressional authorization and appropriation. Shallow-draft navigation would be prohibited over time because the channel would not be maintained; however shallow-draft navigation would not be impeded by a structure. Most shallow-draft navigation would be unable to use the Sound Reach of the channel after about 2014. Shallow-draft tows that use the MRGO as an alternative route when the IHNC is congested or unexpectedly closed could no longer do so after about 2014 (Note: this cost is included in the calculation of net economic benefits). It is estimated that slightly more marsh would be lost than under Alternative 1, but significantly less than under the future without condition. It is estimated that Alternative 3 is unlikely to influence salinity or marsh vegetation types or reduce the "H-A zone" in Lake Pontchartrain. Additionally, potential future ecosystem restoration measures, such as a freshwater diversion structure at Violet, could be more difficult to implement than under Alternative 1. For example, without a structure in the MRGO channel, a much larger freshwater diversion would be required at Violet, which would increase cost significantly and decrease the ability to control desired environmental results within the greater Pontchartrain Basin. Assessment of this alternative also raised questions about whether or not the alternative could be classified as comprehensive and therefore responsive to the Congressional direction.

2.9 RATIONALE FOR SELECTING RECOMMENDED PLAN

Alternative 1 has been selected as the Recommended Plan. The Recommended Plan is consistent with the study authority as described in Public Law 109-234 and explained in House Report 109-494 (see Section 1.2). The Recommended Plan also fulfills the study purpose and need (see Section 1.5) and the study goals and objectives (see Section 1.6) which are derived from the study authority. The Recommended Plan presents a comprehensive plan to de-authorize all navigation on the MRGO channel from the GIWW to the Gulf of Mexico; proposes that navigation function be maintained outside of the GIWW to Gulf of Mexico portion of the channel; proposes plan features; and proposes existing project features to be de-authorized or to remain authorized (see Section 6.1). The Recommended Plan minimized cost associated with the disposition of the de-authorized project while meeting the criteria of completeness, effectiveness, efficiency and acceptability. The Recommended Plan results in $7.8 million in net annual benefits, reduces negative environmental impacts in the study area through reductions in erosion and salinity, and may reduce the size of the "H-A zone" in Lake Pontchartrain. The Recommended Plan was developed in consultation with St. Bernard Parish, the State of Louisiana, and affected Federal Agencies, as well as other stakeholders and the general

public (see Section 4). While the Recommended Plan does not propose hurricane or storm damage reduction features, the Recommended Plan was identified because it is more compatible with the goals of LACPR than Alternative 3. The Recommended Plan is acceptable, complete and effective as evaluated under the P&G criteria. Although the plan is not the least cost alternative, it is recommended because it fully meets three of the four P&G criteria while Alternative 3, the least cost alternative, only fulfills the efficiency criteria. Additionally, the Recommended Plan is consistent with all of the alternatives being evaluated under LACPR and can be fully integrated into any of the LACPR plans under consideration. The Recommended Plan provides for reduced salinities in areas targeted for restoration under LACPR, LCA, CWPPRA, as well as, restoration efforts of other Federal and State agencies. Reduction in salinities will improve the effectiveness of, and likely reduce the cost of, ecosystem restoration measures planned for these areas. The MRGO Final Report and LEIS will be included in the LACPR Final Report. Specific features of the Recommended Plan are addressed in Section 6.

SECTION 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section first generally describes the project area. The remainder of the chapter presents conditions for each significant resource, future without de-authorization conditions and then the direct and indirect impacts of the two alternatives on these significant resources. Significant resources presented include: water quality (with an emphasis on salinity); vegetation; wildlife; fisheries; essential fish habitat; threatened and endangered species; recreation; cultural resources; aesthetics; air quality; navigation; business; employment and community cohesion. Comparative and cumulative impacts of the alternatives are analyzed at the end of the chapter.

3.1 PROJECT AREA DESCRIPTION

3.1.1 Land Characteristics

The project area is located in southeastern Louisiana in St. Bernard, Orleans, Jefferson, St. Charles, St. John the Baptist, Tangipahoa and St. Tammany Parishes (see Figure 1.1). It covers the Lower Pontchartrain Basin, which consists of Lake Borgne, the MRGO, a portion of the Gulf of Mexico, Chandeleur and Breton Sounds, surrounding wetlands, and small towns near the Mississippi River. The Middle Pontchartrain Basin is also in the project area. It consists of Lake Pontchartrain with its adjacent cities and towns and surrounding wetlands. New Orleans and Metairie lie on the south bank of the lake. The remainder of the lakeshore is mainly wetlands.

The MRGO channel, located southeast and east of New Orleans, is in the Lower Pontchartrain Basin. The channel begins in the Gulf of Mexico and extends through the shallow waters of Breton Sound. There are three- and eight-mile long rock jetties extending from the mainland into the sound on the north and south sides of the channel. Then for 37 miles, the MRGO passes through coastal wetlands. About 10 miles inland, the channel cuts through a relic distributary of the Mississippi River, Bayou La Loutre, and its natural ridge. Bayou La Loutre continues westward from the MRGO to Bayou Terre aux Boeufs and meanders eastward of the MRGO through the Biloxi Marshes. A 4,000-foot wide disposal area built with dredged material from the MRGO lies immediately southwest of the MRGO channel. The marshes of Breton Sound lie directly west of the southern portion of the disposal area. Although there is a small hydrologic connection, the MRGO has very little influence in the Breton Sound wetlands. About 10 miles up the MRGO from Bayou La Loutre, there is a hurricane protection levee constructed on a portion of the disposal area adjacent to the MRGO channel. There are shoreline protection features all along this portion of the disposal area. The levee runs atop the disposal area northwestward along the MRGO to the GIWW. A local levee, known as the Forty Arpent Levee, is found immediately west of the Central Wetlands. Open water and wetlands exist northeast of the MRGO. North of Bayou La Loutre, Lake Borgne lies northeast of the channel. There is a landbridge of marsh and ponds between MRGO and the lake, the landbridge is very narrow in two places. The larger towns of St. Bernard Parish (Chalmette, Mereax, Violet, and Poydras) are found between the Forty

Arpent Levee and the Mississippi River. Some small fishing towns lie outside the hurricane protection levee, such as Yscloskey, Shell Beach, and Hopedale.

The MRGO connects with the GIWW at the northwest end of the Inland Reach at which point the MRGO and the GIWW run contiguously westward for 6 miles to the IHNC (also called the Industrial Canal) in New Orleans. Hurricane protection levees are located on portions of the north and south disposal areas of the GIWW Reach. The IHNC runs between the Mississippi River and Lake Pontchartrain. The nearly 90-year old IHNC Lock lies at the southern end of the IHNC and provides access to the Mississippi River. The city of New Orleans lies on either side of the IHNC.

3.1.2 Climate

The project area has a subtropical marine climate strongly influenced by the water surface of many sounds, bays, lakes and the Gulf of Mexico. Prevailing southerly winds increase the marine climate characteristics. During the fall and winter, the project area experiences cold continental air masses which produce frontal passages with temperature drops. During the spring and summer, the project area experiences tropical air masses which produce a warm, moist airflow conducive to thunderstorm development.

The project area is susceptible to tropical storms and hurricanes. These weather systems can cause considerable property and environmental damage and loss of human life. The most recent hurricanes were Katrina and Rita in 2005, which caused devastating damage in the project area.

3.2 SIGNIFICANT RESOURCES

3.2.1 Water Quality

Over the past 6,000 to 7,000 years, salinity in the project area has shifted with the major deltaic meandering of the Mississippi River. Modern efforts to control flooding and improve navigation included numerous bank stabilization, channel alignment, dredging, lock, dam, levee, and spillway projects on the Mississippi River. Such alterations to the Mississippi River and surrounding wetlands have increased salinity in the project area by altering the flow of freshwater in the region (USACE 2004).

Prior to construction of the MRGO typical tidal flow within the Breton Sound area was reduced as it moved across the marshes and wetlands inward toward Lake Borgne (USACE 2004). The Bayou La Loutre ridge provided a basin boundary that limited the flow of saline water from the Breton Sound area into Lake Borgne (Rounsefell 1964). The MRGO provides a more direct flow of higher salinity and higher density water inland toward areas of St. Bernard and Orleans Parishes due to the breaching of the La Loutre Ridge (Wicker, et al. 1981).

A hypoxic/anoxic zone in Lake Pontchartrain was first described by Poirrier (1978). Its existence was verified by extensive water quality sampling done by DEQ in 1980 and 1982 (Schurtz and St. Pe, 1984). This zone appears to be caused primarily because the MRGO carries bottom water in excess of 20 parts per thousand (ppt) which enters the

IHNC and then Lake Pontchartrain during the flood tide cycle (Georgiou and McCorquodale 2002). This saline water sinks to the bottom where it moves with the bottom lake currents and can cover at least 1/6 of the lake's bottom. This stratified water inhibits both mixing and oxygenation, generally leading to hypoxic (low oxygen) or anoxic (no oxygen) conditions near the lake bottom (Schurtz and St. Pe' 1984). This H-A zone seems to appear most often in the spring and summer (Abadie and Poirrier 2001).

Coliform levels along the MRGO have usually exceeded the DEQ criteria, indicating a widespread area of water and wetlands that are subject to bacterial pollution. The likely source is nearby populated areas. Measured dissolved oxygen levels at Bayou Dupre have consistently been above the minimum state standard and Environmental Protection Agency (EPA) criteria. With rare exceptions, the pH measurements also have been within the desirable range of 6.5 to 9.0. Toxic substances, including heavy metals and synthetic organics, have been measured above EPA criteria levels, but no patterns consistently exceeding the criteria for particular substances have been observed.

3.2.1.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

No significant increase in average annual salinity is projected in the foreseeable future for Lake Maurepas and Lake Pontchartrain. Salinity is expected to increase in the Lake Borgne region and surrounding marshes due to wetland loss in the area (Tate, et al. 2002; USACE 2004). Other water quality parameters would likely remain unchanged. The "H-A zone" in Lake Pontchartrain could continue to exist.

3.2.1.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

During construction of the total closure structure, turbidity would be temporarily increased and dissolved oxygen could drop in the vicinity of the work.

In 2002, researchers modeled the seasonal changes in salinity that might occur in the Lake Pontchartrain Basin as a result of varying the depth and width of the MRGO at the Bayou La Loutre ridge (Tate, et al. 2002). Results of the study are presented in Appendix D. The biggest modeled reductions in salinity are at Martello Castle and Alluvial City north of the closure and adjacent to the MRGO (see Figure 1.1). By lowering salinity stratification north of the total closure structure, it is possible that much of the stratification in Lake Pontchartrain could be reduced. and it is expected that the size of the "H-A zone" in the lake could shrink (Abadie and Poirrier 2001). Other water quality parameters in MRGO and vicinity might remain unchanged.

3.2.1.3 Alternative 3 - Cease All MRGO Operations and Maintenance Activities Immediately

It is estimated that salinity could remain as it is for several years. In about 2014, the Breton Sound segment of the MRGO could silt to 12 feet. The channel across the sound would eventually reach ambient depth. USACE estimates the jetty reach might not silt to 12 feet for 15 years and the lower half of the Inland Reach could take 40 years to reach 12 feet. It is estimated that salinity might gradually drop as channel depth decreases, but

tides and southerly winds could continue to push water with high salinity up the MRGO for many years.

3.2.2 Vegetation

Coastal Louisiana was created by the Mississippi River as it moved across the landscape over the last 7,000 years. It would create a delta, then find a shorter way to the Gulf and create another delta as the former one deteriorated. Bayous Sauvage and La Loutre were Mississippi River distributaries that created much of Orleans and St. Bernard Parishes. When Europeans arrived, they started taming the river with levees so the area could be inhabited. After the 1927 flood, the river was leveed most of its way through Louisiana. These levees prevented the nearly annual flooding that brought sediment and nutrients to the wetlands and sustained them. Channels were dug for navigation and canals to extract petroleum which changed the hydrology of the wetlands, allowed saltwater to move into freshwater wetlands and ponded water on other wetlands (USACE 2004). Nutria were introduced in the 1930's and escaped and now damage wetlands. Natural subsidence is occurring at a rate of approximately one to three feet per century in the study area (USACE 2004). Storms also cause erosion and hurricanes can destroy significant amounts of marsh. For these natural and man-made reasons, coastal Louisiana is losing about 24 square miles of wetlands per year (Barras et al. 2003).

Table 3.1 shows habitat change and wetland loss between 1956 and 1990 in the project area, which amounts to a loss of 68,660 acres of wetlands. Factors such as subsidence, navigation channels, oil and gas exploration and production, development and storms have contributed to these losses. Approximately 67 percent of the swamp in the project area was lost while saline marsh gained 8 percent.

Table 3.1 Habitat Change in Project Area 1956-1990

Middle and Lower Basin Wetlands	**1956**	**1978**	**1990**
Fresh/intermediate Marsh	24,780	22,270	21,280
Brackish Marsh	145,190	135,890	103,360
Saline Marsh	74,020	60,220	79,645
Swamp	43,620	20,760	14,600
Total	287,610	239,140	218,950

(Wicker, 1980; Barras, Bourgeois, Handley, 1994)

Habitat mapping was done by O'Neil in 1949, Chabreck, Joanen and Palmisano in 1968, and Chabreck and Linscombe in 1978, 1988 and 1997. The description below is based on these maps (USGS 2002).

Marsh type is dependent on salinity which is generally determined by rainfall and man-induced changes such as channel and canal dredging. The exact locations and acreages of fresh and intermediate marshes in the project area have fluctuated over time, probably depending on rainfall during the year. Intermediate marsh has been present in the Central Wetlands three of the five years it has been mapped. Brackish marsh has decreased significantly in acreage and fluctuated slightly in location throughout the habitat type mapping period. From 1949-1978 saline marsh was only found south of the Bayou La

Loutre ridge and in the outer Biloxi Marshes. In 1988 saline marsh had encroached up the MRGO to about Bayou Dupre and into the Biloxi Marshes near the MRGO. By 1997, it was found further north along the MRGO, past Bayou Dupre.

3.2.2.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Following the restoration of the channel to its full dimensions, which is expected to create about 1,512 acres of marsh, it would be maintained for the 50-year period of analysis. There would be no beneficial use in the Inland Reach because material would be placed in upland confined disposal areas. Based on past dredging volumes, an average of approximately 17 acres is estimated to be created each year behind the jetties. An average of approximately 21 aces per year is assumed to be created on Breton Island.

Numerous factors contribute to wetlands losses and coastal erosion in the project area including delta deterioration, subsidence, canal and channel construction, wind and wake erosion, salt water intrusion, oil and gas exploration, herbivory, and storms. In order to estimate how many of these created wetlands would remain in 50 years, a standard Wetland Value Assessment spread sheet was used (Roy, 2006). Taking into account the acres assumed created each year and subtracting the acres estimated to be lost each year, there would be approximately 2,702 acres remaining at the end of the fifty year period of analysis.

However, during the same 50 years, erosion along unprotected areas of the MRGO north bank would result in the loss of approximately 4,565 acres of marsh. There could be an estimated net loss of about 2,343 acres of marsh over the 50-year period of analysis (see Appendix G).

3.2.2.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

There would be no beneficial use of dredged material. It is assumed that there would be less bank erosion on the MRGO between the GIWW and the Gulf of Mexico than with the future without condition since there would be no deep- or shallow-draft traffic on the closed channel. It is possible that the loss prevented might be a significant percent of the 2,343 net loss of the future without condition. Although data are not available to permit quantifying changes in vegetation, it is unlikely that the changes in salinities due to closure could cause any large-scale changes in vegetation types within the Pontchartrain Basin.

Two areas immediately adjacent to the MRGO may experience changes in habitat type. Modeling results (Tate et al., 2002) indicate that a total closure structure would return salinity to the brackish marsh salinity range of 4-15 ppt at all months between Martello Castle and Bayou La Loutre (see Appendix D, Exhibit 2). Thus, the land bridge east of MRGO should become brackish marsh most years. In the Central Wetlands, there could be intermediate marsh near the Forty Arpent Levee and more cypress should regenerate.

3.2.2.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

It can be assumed that some deep and shallow-draft vessels could use the channel until about 2014, which is estimated to cause more bank erosion on unprotected banks of the MRGO than Alternative 1. Compared to the future without de-authorization, this alternative is anticipated to cause significantly less future marsh loss because deep and shallow-draft vessels will be unable to use the channel for over 40 years. Salinity in the basin is not likely to change significantly and therefore marsh types would probably remain as at present.

3.2.3 Wildlife

Kerlin (1979) described the wetlands of St. Bernard Parish, south of Lake Borgne, as being "second only to the marshes of the lower Mississippi River Delta in importance to waterfowl in southeastern Louisiana." The area supported at least 250,000 ducks during the winter and was important for the production of muskrat, nutria, mink, river otter, and raccoon, all staples of the Louisiana fur industry.

Since about 1970, waterfowl and furbearers have declined in the lower basin (Kerlin 1979). However, they are still present. Alligators too have declined, but are still present (Kinler and Campbell 2002). Birds found in the project area include nine species of wading birds, more than five species of seabirds, four species of shorebirds, six species of songbirds, and several raptor species. Game mammals present are swamp rabbit, raccoon, and fox/gray squirrels. Non-game mammals include opossum, nine-banded armadillo, and several species of bats, rodents, and insectivores (USFWS 1997).

Personnel from Louisiana Department of Wildlife and Fisheries, U.S. Fish and Wildlife Service and Natural Resources Conservation Service provided recent (since 1985) trends in wildlife for the 1998 Coast 2050 Study (Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Wetlands Conservation and Restoration Authority.1998). They assessed common wildlife in the mapping units of the Middle and Lower Basin. Populations of seabirds, shorebirds, dabbling and diving ducks and raptors have been generally steady there since 1985. Around Lake Pontchartrain populations of furbearers, game mammals and alligators have been steady. In the lower basin, these animals have generally been decreasing since 1985.

The bald eagle was officially removed from the List of Endangered and Threatened Species as of August 8, 2007. However, it continues to be protected under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). The USFWS developed the National Bald Eagle Management (NBEM) Guidelines to provide landowners, land managers, and others with information and recommendations regarding how to minimize potential project impacts to bald eagles, particularly where such impacts may constitute "disturbance," which is prohibited by the BGEPA. Those guidelines recommend maintaining: (1) a specified distance between the activity and the nest (buffer area); (2) natural areas (preferably forested) between the activity and nest trees (landscape buffers); and (3) avoiding certain activities during the breeding season. The buffer areas serve to minimize visual and auditory impacts associated with human

activities near nest sites. Ideally, buffers would be large enough to protect existing nest trees and provide for alternative or replacement nest trees. On-site personnel should be informed of the possible presence of nesting bald eagles within the project boundary, and should identify, avoid, and immediately report any such nests to the USFWS Regional Office located in Lafayette, Louisiana. A copy of the NBEM Guidelines is available at: http://www.fws.gov/migratorybirds/issues/BaldEagle/NationalBaldEagleManagementGuidelines.pdf. Bald eagles are currently winter breeding residents in southern Louisiana.

Section 10 of the Main Report provides common and scientific names of plants and animals mentioned throughout this report and appendices.

3.2.3.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Marsh loss that is estimated to occur with this scenario means that there could be less habitat available for wildlife that utilizes marshes such as waterfowl and furbearers. It is possible that this could lead to fewer numbers of certain species, such as mallards, green-winged teal and muskrat. Although bald eagles are unlikely to nest near the MRGO channel, they may use the area as forage. However, they are likely to avoid the area during maintenance dredging and temporarily disperse into adjacent areas with available foraging habitat.

3.2.3.2 Alternative 1 –Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

The estimated reduction in marsh loss could increase the abundance of wildlife that utilizes marsh, such as wading birds and sea birds, compared to the future without de-authorization. The reduction of salinity above the total closure structure could improve portions of the project area slightly for waterfowl and furbearers. Although bald eagles are unlikely to nest near the proposed project area, they may use the area as forage. However, they are likely to avoid the project site during construction and disperse into adjacent areas with available foraging habitat.

3.2.3.6 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

It is possible that there could be less of an increase of marsh-dependent wildlife than Alternative 1. Salinity in the basin is not likely to change significantly, so habitat for waterfowl and furbearers are anticipated to stay as it is now. Bald eagles are unlikely to be affected under this alternative.

3.2.4 Fisheries

Rounsefell (1964) characterized fishery resources in the marsh and bayou areas now traversed by the MRGO using bimonthly sampling data collected by the Texas Agricultural and Mechanical Research Foundation during the period July 1959 to March 1961 (El-Sayed 1961). Estuarine-marine species dominated the fish communities with spot, Atlantic croaker, anchovy, and sea trout ranked among the top 10 species in every area sampled. Only two freshwater species, blue catfish and sunfish, ranked among the top 10 species. Four non-migratory estuarine species ranked among the top 10 species in

each of the lower salinity areas. Four marine species were among the top 10 most abundant species in the higher salinity areas (El-Sayed 1961).

The five most widespread and economically important fish species (spot, Atlantic croaker, anchovy, sea trout, and Gulf menhaden) were more abundant in the higher salinity areas. Neither brown shrimp nor white shrimp exhibited notable salinity preferences and were transient residents of the marshes. Small blue crabs were most abundant in low salinity waters (Rounsefell 1964).

Fontenot and Rogillio (1970) sampled Lake Borgne and the Biloxi Marshes from 1960-1968. They reported an overall increase in salinity in the early 1960's. Of the 22 species of freshwater fish caught early in the study, 10 species disappeared by the end of the study. Ecological affinities were evenly distributed with 32 percent freshwater species, 29 percent estuarine-marine species, and 29 percent marine species. The six important sport fish in the area, spotted sea trout, Atlantic croaker, black drum, red drum, spot and Gulf sheepshead, were not influenced by the increased salinity.

Lake Pontchartrain was studied by Thompson and Fitzhugh (1985) who described it as having a strong freshwater species component before MRGO with freshwater fish comprising 33 percent of the species, marine fishes 30 percent and estuarine-marine species 20 percent. However, estuarine-marine species dominated the lake in numbers of individuals with Atlantic croaker, Gulf menhaden, sand seatrout and red drum being common. White shrimp were more common than brown shrimp most years. Much of the lake bottom was disturbed by dredging for Rangia clams. Large clams were generally found only near the edges of the lake (Thompson and Fitzhugh 1985).

While studying Lake Pontchartrain, Thompson and Fitzhugh (1985) found that the 10 most abundant species showed patterns of relative abundance similar to pre-MRGO surveys. Bay anchovy and Atlantic croaker were the most abundant in all studies. However, species diversity declined dramatically after MRGO. In the 1950s otter trawls yielded 44-60 species; in the 1970s, only 27-33 species were collected. White shrimp landings generally decreased, while brown shrimp landings increased after the construction of MRGO in both Lake Pontchartrain and Lake Borgne, most likely as a result of salinity increases (Thompson and Fitzhugh 1985).

Benthic species were taken less frequently in 1978 than in 1953-54, indicating deterioration of the lake bottom due to shell dredging (Sikora and Sikora 1982). Shell dredging ceased in 1990 and the benthos was expected to improve (Abadie and Poirrier 2000).

Personnel from Louisiana Department of Wildlife and Fisheries and National Marine Fisheries Service provided recent (last 10-20 years) trends in fisheries for the 1998 Coast 2050 Study (Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Wetlands Conservation and Restoration Authority.1998). They assessed common commercial and recreational fish in the mapping units of the Middle and Lower Basin. They found trends had been steady for red and black drum, brown land white shrimp,

spotted seatrout, blue crab, American oyster, Gulf menhaden and southern flounder in most of the area. Red drum have been increasing in the Biloxi Marshes and Eloi Bay. The oyster has been decreasing in the Central Wetlands and Eloi Bay.

The "H-A zone" which appears to develop primarily due to high salinity from the MRGO adversely affects benthos. In the spring and summer, there are often no large Rangia clams in the 1/6 of the lake often affected by the "H-A zone." Other sessile benthic organisms are probably adversely impacted during the hypoxic events (Junot et al. 1983).

3.2.4.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

During dredging, turbidity would temporarily increase. Fish could avoid the turbid area. Benthos would be destroyed by actual dredging and by disposal in the sound. However, populations should return in a few months. Some shallow-water benthos would be destroyed during marsh creation, but it could be replaced with the benthos typical of a saline marsh. It is probable that the six most important sport fish could be present in at least the same numbers as they are now. In Lake Pontchartrain large Rangia clams and other benthos are expected to remain absent from the "H-A zone." Fishery production in the lake could remain as it is at present.

In the Lower Basin a net loss of marsh might cause a slight decline in estuarine dependent fish. Fishery distribution in the Upper Basin should remain as it is at present because salinity has stabilized (Tate et al. 2002).

3.2.4.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Placement of the total closure structure could destroy about 17 acres of benthic habitat. Reducing marsh loss is estimated to improve estuarine dependent fisheries compared to the future without de-authorization. Passage for fish up and down MRGO would be blocked by the total closure structure. There are numerous alternate routes such as Bayou La Loutre, the Back Levee Canal, Lena Lagoon, Lake Athanasio, Alabama Bayou, and others that would allow organism movements through the estuary. Portions of the basin north of the total closure structure could become slightly less saline (see Water Quality). Rock surfaces of the total structure could be utilized as an attachment surface by epiphytic algae and invertebrates that form an additional food web base. Fishery abundance and distribution should increase slightly compared to the future without. It is probable that the six most important sport fish could be present in at least the same numbers as they are now. Salinity stratification in Lake Pontchartrain could be reduced and the "H-A zone" is estimated to be diminished. This could allow large Rangia clams to exist throughout the lake and other sessile benthos could increase, which should provide more food for fish that rely on benthos.

3.2.4.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

Salinity in the basin is not likely to change significantly. There are expected to be slightly less improvements in estuarine-dependent fisheries than Alternative 1. It is

probable that the six most important sport fish might be present in the same numbers as they are now. In Lake Pontchartrain, large Rangia clams and other benthos are expected to remain absent from the "H-A zone." Thus fisheries in the lake could remain as they are today.

3.2.5 Essential Fish Habitat (EFH)

The Magnuson-Stevens Fishery Conservation and Management Act, mandating protection of Essential Fish Habitat, became law in 1995. Essential fish habitats are "those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity." Specific categories of EFH include all estuarine waters and substrates (mud, sand, shell, rock, and associated biological communities), including the sub-tidal vegetation (sea grasses and algae) and adjacent inter-tidal vegetation (marshes and mangroves).

The Gulf of Mexico Fishery Management Plan (FMP) designates the fresh, estuarine, and marine waters in St. Bernard Parish as EFH. The FMP manages several fisheries occurring in St. Bernard Parish or adjoining waters; they include brown shrimp, white shrimp, red drum, gray snapper, and Spanish mackerel. Categories of EFH in St. Bernard Parish have been designated by the Gulf of Mexico Fishery Management Council through the 1998 generic amendment of the FMP for the Gulf of Mexico. In the Inland Reach of the MRGO white shrimp, brown shrimp, red drum, and sharks are likely to be present.

EFH in the project area includes the estuarine waters and substrates of the MRGO channel cut and adjacent water bottoms from the Gulf of Mexico to Mile 60. Substrates include mud bottoms, some of which have been dredged and re-deposited.

3.2.5.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Bottom habitat would be temporarily disturbed during dredging and open water disposal in the sound. Marsh could be created with dredged material in amounts as were created pre-Katrina and bank erosion on the unprotected portions of the north bank could continue. There could possibly be a net loss of marsh over 50 years, all valuable EFH.

3.2.5.2 Alternative 1 –Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

There could be destruction of about 17 acres of EFH on the bottom of the MRGO at the total closure structure location. Passage for brown and white shrimp, sharks and red drum up and down MRGO would be blocked by the total closure structure. However, there are numerous alternate routes such as Bayou La Loutre, the Back Levee Canal, Lena Lagoon, Lake Athanasio, Alabama Bayou, and others that would allow for continued organism movement through the estuary. Compared to the future without de-authorization, it is possible that this alternative could decrease future marsh loss increasing valuable EFH.

3.2.5.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

There would be no dredging so EFH at the bottom of MRGO and in disposal areas in the sound would not be temporarily disturbed. The channel would slowly shoal, when filled significantly it would be more valuable EFH. Compared to the future without de-authorization, this alternative is expected to significantly decrease future marsh EFH loss, but the decrease is not likely to be as much as that in Alternative 1.

3.2.6 Threatened and Endangered Species

The Endangered Species Act of 1973 protects Federally listed species and their designated critical habitats.

A variety of whales including several threatened and endangered species ply the deeper waters of the Gulf of Mexico, but would not normally be expected to occur in inshore or near shore waters. The hawksbill sea turtle (E) and leatherback sea turtle (E) are extremely rare in this portion of the Gulf of Mexico, and only occasional strays occur in Louisiana

Prior to Hurricane Katrina, the USACE used dredged material from Breton Sound to create an average of 21 acres of barrier island habitat per year on Breton Island. No placement of dredged material has occurred on Breton Island since Hurricane Katrina. Hurricane Katrina nearly destroyed all of South Breton Island and left only a small piece of North Breton. The remainder of the Chandeleur chain was also severely damaged.

In the past, brown pelicans bred on Breton Island and foraged in the waters of Breton and Chandeleur Sounds. Brown pelican nesting success has apparently decreased since Hurricane Ivan in 2004. However, brown pelicans are not presently nesting, and have not nested in the recent past on Breton Island. In the early 2000's, brown pelicans nested on islands created by the USACE at Baptiste Collette Bayou. These islands do not appear heavily damaged by the 2005 hurricane season.

Prior to the 2004-2005 hurricane seasons, wintering piping plovers occasionally used exposed flats in the area, especially on the Chandeleur Islands, including Breton Island. Portions of these islands are designated as Critical Habitats.

The loggerhead sea-turtle occasionally occurs in the MRGO in the vicinity of the Bar Channel. Kemp's Ridley sea turtle has appeared recently in some numbers in the Grand Isle/Grand Terre area, and apparently occurs in the vicinity of the MRGO. The green sea turtle has also been sighted in the vicinity of the MRGO. Sea turtles are apparently rare in the MRGO. When dredging occurs, sea turtle generally leave the vicinity of the dredge.

Manatees have been sighted within the MRGO, and are known to travel long distances up coastal waterways from the Gulf of Mexico. On July 9, 2001, a manatee was observed passing safely through the IHNC Lock and into the Mississippi River. Manatees are usually within Louisiana coastal waterways only during the warm weather/warm water months.

Reports of incidental catches and sightings show that the Gulf sturgeon exists within several coastal waterways and lakes in southeast Louisiana, including those connected to the MRGO. Lake Pontchartrain east of the Causeway and Lake Borgne are designated as Critical Habitat for the Gulf sturgeon. The potential exists for Gulf sturgeon to be within the MRGO through access from Breton Sound, Lake Borgne, the IHNC, and the GIWW.

In 2006, USACE, MVN prepared an extensive draft Biological Assessment to address impacts that USACE navigational operations and maintenance projects might have on the Gulf sturgeon. Data and conclusions from this report are incorporated by reference into this LEIS. The Gulf sturgeon spends the late fall, winter and early spring foraging in the Gulf of Mexico and its estuaries such as Lakes Borgne and Pontchartrain. They then enter coastal rivers like the Pearl River April through June to spawn and rest. The sturgeon leave the rivers for the estuaries and the Gulf September through November.

There have been four records of Gulf sturgeon within the project area. In 1974 a commercial fisherman reported taking a 7-foot Gulf sturgeon in Bayou Bienvenue. A commercial fisherman in 1983 reported catching a 6-foot Gulf sturgeon in Violet Canal. In 1990, Louisiana Wildlife and Fisheries (LDWF) personnel captured a 32-inch Gulf sturgeon in Lena's Lagoon near the MRGO. In January 2005 a sturgeon was found in the MRGO near the Breton Sound Marina during an USACE study of sonic-tagged Gulf sturgeon (Kirk 2007).

Estuaries near river mouths are important because adults and sub-adults have fasted while in the river. They eat available polychaetes, gastropods, isopods and amphipods. They prefer sandy bottoms such as those found in Lake Pontchartrain near Goose Point, Fountainbleau State Park, and just west of Hwy 11. The eastern part of the lake is an important wintering habitat for sub-adults and juveniles.

3.2.6.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Beneficial use of dredged material could continue on Breton Island and this area could be available for use by brown pelicans and wintering piping plovers. Existing detailed dredging contract conservation specifications dealing with manatees, Gulf sturgeon, and sea turtles would continue, as would coordination with USFWS and National Marine Fisheries Service (NMFS). Sea turtles, in agreed upon numbers would continue to be taken in the Bar Channel. Thus, the maintenance of the deep-draft channel is not likely to adversely affect threatened or endangered species.

3.2.6.2 Alternative 1 - Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Any brown pelicans that might occur in the project area during construction and maintenance could be temporarily displaced to nearby suitable habitat. There could be less habitat for brown pelicans and less Critical Habitat for the piping plover since there would be no beneficial use on Breton Island because maintenance dredging would cease. No more sea turtles would be taken in the Bar Channel. For construction of the total

closure structure, existing detailed contract specifications which protect sea turtles, manatees and Gulf sturgeon would continue, as would coordination with USFWS and NMFS (see Appendix J). Passage for Gulf sturgeon and manatees up and down MRGO would be blocked by the total closure structure. However, there are numerous other alternate routes such as Bayou La Loutre, the Back Levee Canal, Lena Lagoon, Lake Athanasio, Alabama Bayou, and others that allow for fish passage through this portion of the estuary. Thus, construction and maintenance of the total closure structure is not likely to adversely affect threatened or endangered species.

3.2.6.3 Alternative 3- Cease All MRGO Operations and Maintenance Dredging Activities Immediately

There would be no impacts to endangered or threatened sea turtles since the Bar Channel would not be dredged. There could be less habitat for brown pelicans and less Critical Habitat for the piping plover since there would be no beneficial use of dredged material on Breton Island. This alternative is not likely to adversely affect any endangered or threatened species.

3.2.7 Natural and Scenic Rivers System

The Louisiana Natural and Scenic Rivers System was established in 1970. There are presently seven waterways designated by the State of Louisiana as Natural and Scenic Rivers in the vicinity of the MRGO (see Figure 3.1). The portion of Bayou Bienvenue from Bayou Villere to Lake Borgne is designated. The remaining designated waterways in the project area are in the Central Wetlands with Pirogue, Bashman and Terre Beau Bayous being clustered around the area where Bayou Dupre (also scenic) goes through the MRGO disposal area. Bayou Chaperon is about 2 miles north of Bayou Dupre and runs from the Forty Arpent Levee northeastward to the MRGO disposal area. The Lake Borgne Canal (Violet Canal) runs from the Mississippi River levee to the Central Wetlands where it meets Bayou Dupre.

3.2.7.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Maintaining the authorized deep-draft channel should have essentially no impact on any Louisiana natural and scenic rivers.

3.2.7.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Construction of the total closure structure should have essentially no impact on any Louisiana natural and scenic rivers.

3.2.7.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

No impact.

Figure 3.1 – Natural and Scenic Rivers System

3.2.8 Air Quality

Congress passed The Clean Air Act in 1963 during construction of MRGO. St. Bernard Parish is currently classified in attainment of all NAAQS (USEPA EA #PO-30). This classification is the result of area-wide air quality modeling studies.

3.2.8.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

This alternative would have no impact on present air quality and attainment status. However, ambient air quality would be impacted temporarily due to the emissions of dredges in the project vicinity. At construction cessation, air quality in the project area would return to pre-construction conditions. The total volatile organic compound emissions for this project during construction are anticipated to be well below the minimum level of 100 tons/year. Therefore, this action conforms to the Louisiana State Implementation Plan.

3.2.8.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Impacts would be the same as future without described above.

3.2.8.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

No impacts.

3.2.9 Recreation Resources

Several non-Corps, state and Federal areas within or adjacent to the project area, provide recreational resources to the public (see Table 3.2). Many of the Important Birding Areas (IBA) in Louisiana recognized by the National Audubon Society (NAS) are State or Federally operated areas. In this basin the NAS lists Breton National Wildlife Refuge (NWR) as an IBA. According to an April 2007 press release by the NAS, "The Breton/Chandler barrier island chain once housed tens of thousands of nesting terns and ducks, more than enough to meet the criteria as a global IBA for congregatory species. Despite the loss of 50% of their habitat area as a result of Hurricane Katrina, these islands still support globally important populations of Royal and Sandwich terns."

Marsh losses in the area are associated with the channel and other factors such as subsidence, storms, development and oil and gas exploration. However, habitat loss apparently has not influenced the six important sport fish in the area, spotted sea trout, Atlantic croaker, black drum, red drum, spot and Gulf sheepshead. Overall, there are less freshwater fish caught in the area today compared to historic data. Species diversity has declined, reducing the variety of fish caught by recreational fisherman (Thompson and Fitzhugh 1985).

Waterfowl hunting in the area has changed due to elimination of valuable wintering habitat according to biologists of the LDWF. The marshes south of Lake Borgne are of less value to certain types of waterfowl (snow geese, mallard, and green-winged teal) due to salinity intrusion and marsh deterioration caused by many factors. Recreational

hunting for certain species has been adversely affected locally but remains strong in other areas of the state. Access to fishing and hunting areas is through bayous, canals and by way of the MRGO via boat launch ramps.

Table 3.2 Major Public Recreation Resources within Lake Pontchartrain Basin

State of Louisiana	Lake Pontchartrain Sanctuary	Trawling is prohibited in Lake Maurepas and that portion of Lake Pontchartrain from the shoreline 1 ¼ miles out from the Jefferson Orleans Parish line west to South Point, from South Point along the railroad bridge west from the railroad bridge to Goose Point. Trawling is prohibited between the railroad bridge and the I-10 in Lake Pontchartrain.
US Fish and Wildlife Service National Wildlife Refuges (NWR)	Bayou Sauvage NWR	A refuge of 22,770 acres with estimated annual visitation of 400,000 with a value of $15 million; one of its objectives is to provide opportunities for fish and wildlife-oriented recreation in an urban setting, offering trails, fishing, bird watching, canoeing, photography, bicycle path, crawfishing and crabbing, van tours and wildlife observations.
	Breton NWR	A refuge of 18,000 acres, of which 5,000 acres are designated as Class 1 Wilderness, with estimated annual visitation of 100,000 with a value of $10 million. Public opportunities include fishing, photography, camping and bird watching.
	Big Branch NWR	A refuge of 15,000 acres offering environmental education, birding, fishing, hunting, biking, hiking and canoeing.
Louisiana Wildlife and Fisheries (LDWF) Wildlife Management Areas (WMA)	Biloxi WMA	39,583 acres, offering hunting and fishing, camping, boating, crabbing, shrimping and bird watching.
	Joyce WMA	15,609 acres offering hunting, fishing crawfishing, bird watching and berry picking.
	Manchac WMA	8,325 acres, offering hunting, fishing, crabbing with a drop net and bird watching.
	Pearl River WMA	34,896 acres, offering fishing, canoeing, boating, crawfishing, waterfowl hunting, and camping.
	St. Tammany Wildlife Refuge	1,309.54 acres remain managed as a wildlife refuge. A variety of resident wildlife species inhabit the refuge including furbearers and alligators. It also serves as a resting and feeding area for wintering waterfowl.

3.2.9.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Recreation fishing would be temporarily disturbed during dredging operations. Much of the recreational activities occurring in Louisiana consist of hunting, fishing and wildlife viewing. Each of these activities are directly related to the conditions of natural resources of the area, and affected by land loss and changes in habitat diversity, and wildlife and fisheries populations that are expected to occur under the future without de-authorization. Populations of migratory birds and other animals could decrease that are directly dependent on the marsh and swamp.

Recreational resources in the project area that would be most affected in the future without action are those related to possible loss of wetlands/marshes and habitat diversity. Many recreational activities are based on aquatic resources and directly related to the habitat and species in an area. Habitat changes affect the wildlife populations, thereby affecting many recreational resources. Because salinity levels are expected to be

stable in the Middle Basin over the future without-project condition, little habitat change is expected. Habitat change could occur in the Lower Basin. However, loss of marshland from various causes over the project life and an increase in open water might have slight impacts on recreational fishing and hunting for estuarine-dependent species over the project life. Fishery habitats might decline as spawning places in the marsh are destroyed. A slight decline in the game population would also affect the hunting opportunities. Access to fishing and hunting areas would be through bayous, canals and by way of the MRGO via boat launch ramps.

3.2.9.2 Alternative 1: Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

The MRGO would no longer be used for access to points south of Bayou La Loutre. Passage for fish up and down the MRGO would be blocked by the total closure structure. However, many other local waterways are available as an alternative. Because fishery abundance and distribution are expected to increase slightly as compared to the future without de-authorization, there could be minimal but positive impacts on recreational fishing and hunting. The six most important sport fish could be present in the same numbers as they are now. Estuarine-dependent fisheries could also be positively impacted due to decreased loss in marsh habitat compared to future without de-authorization conditions. Lower salinity in portions of the project area is anticipated to have minimal positive effects on waterfowl compared to the future without de-authorization.

3.2.9.3 Alternative 3: Cease All MRGO Operations and Maintenance Dredging Activities Immediately

Under this condition, the MRGO between the GIWW and the Gulf of Mexico would not be dredged so recreational resources would temporarily be undisturbed. The channel would slowly shoal over time. Wetlands loss is anticipated to be significantly less that future without de-authorization, but more than in Alternative 1. Salinity in the basin is not likely to change significantly; there should be no positive or negative impact to fisheries from salinity changes. The six most important sport fish could be present in the same numbers as they are now. Waterfowl hunting could slightly increase under this alternative, compared to future without de-authorization. Access to fishing and hunting areas would be through bayous, canals and by way of the MRGO via boat launch ramps.

3.2.10 Cultural Resources

3.2.10.1 Prehistoric Period

Several prehistoric sites are located along and near Bayou La Loutre. These archaeological sites range in age from the Troyville Period, ca. A.D. 400 to A.D. 700 through the Mississippian Period, ca. A.D. 1100. These time periods show an increase in population and a resulting proliferation of sites. Mound building continued but rather than used as burial mounds as in the preceding Marksville period (A.D. 200 to A.D. 400), these mounds were used as ceremonial platforms. Around 1100 A.D. in the Coles Creek, Plaquemine and Mississippian periods, large ceremonial centers were constructed with two or more large pyramidal mounds around a plaza in which they conducted religious

and civic ceremonies. During the Plaquemine/Mississippian periods, corn, squash and gourds were added to a hunting and gathering economy. Sites along Bayou La Loutre dating to the prehistoric period are 16SB91, 16SB76, 16SB142 and 16SB77.

3.2.10.2 Modern Conditions

Although people lived in the area, it was not until around 1829 and into the 1840s that U.S. surveyors began to map the area. The 1840s Plat maps show several small plantations and cabins along the southeast bank of Bayou La Loutre. The area of land around the MRGO coastward from its intersection with Bayou La Loutre does not indicate land claims or settlements although the marsh was being utilized if not permanently settled. The archaeological record along Bayou La Loutre shows historic use as early as the late 1700s. Historic sites along Bayou La Loutre are 16SB92 which consists in two historic house foundations; 16SB91 which besides a prehistoric component also contains historic ruins and one tombstone; 16SB90, a late 1700s or early 1800s cemetery; 16SB142 a scatter of historic artifacts; and an unspecified historic site, 16SB77.

Oil drilling began in eastern St. Bernard Parish around the late 1930s with the construction of numerous canals such as the Bakers Canal and Engineers Canal which extend off of Bayou La Loutre. The seafood industry remains important in the area. Many of the businesses along the Bayou La Loutre and Bayou Yscloskey area harvest oyster and shrimp. Oil activity continues to occur in the area.

The entire project area has been inventoried for cultural resources. In 1979, Coastal Environments, Inc. performed an inventory along the entire MRGO and identified most of the sites in the project area (Coastal Environments 1982).

It is expected that Hurricane Katrina heavily damaged many of the sites in the Bayou La Loutre area. Several of the sites along Bayou La Loutre were not evaluated for National Register eligibility. These sites are: 16SB91, 16SB142, 16SB76, 16SB142, 16SB143 and 16SB77. Sites that have been determined to be not eligible to the National Register of Historic Places are: 16SB92 and 16SB90. No sites along Bayou La Loutre have been determined eligible to the National Register of Historic places.

3.2.10.3 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

The Corps has met with the State Historic Preservation Office (SHPO) and determined that this action would not have an adverse effect on historic properties.

3.2.10.4 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

The Corps has met with the SHPO and determined that this alternative would not have an adverse effect on historic properties.

3.2.10.5 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

The Corps has met with the SHPO and determined that this alternative would not have an adverse effect on historic properties.

3.2.11 Aesthetics (Visual Resources)

The aesthetic values of aquatic areas are usually the enjoyment and appreciation derived from the natural characteristics of a particular area. Aesthetic values found within the project area's tidal marshes apply to the quality of life enjoyed by the general public. Richard Smardon, in *The Future of Wetlands Assessing Visual-Cultural Values* (1983), describes how tidal marshes rate fairly high in landscape quality in comparison to other landscape types. Thus many wetland landscape types, especially open salt marshes, tend to rate highly in scenic quality in the landscape continuum.

At the time of settlement, natural levee ridges bordered Bayou La Loutre and formed the major high elevation features within the project area. These levee ridges most likely appeared as linear woody vegetated islands protruding from the marsh. Ridges, intermingled with meandering water and rich, complex emergent vegetation patterns, presented ideal proportions of vegetation and open water. The variety of natural levee vegetation was mapped in an 1845 plat of a section of Bayou La Loutre. Vegetation existing then included cane, palmetto, live oak, sweetgum, hackberry, elm, ash, and wax myrtle.

Profound changes in the environment brought on by natural and human activities have altered the visual surroundings of the Bayou La Loutre area. Major changes include an increase in marsh deterioration due to navigation channels, oil and gas related canals, logging canals and subsidence. These changes have resulted in the area being dominated by geometric forms and patterns not natural to the tidal marsh environment. Subsidence has greatly reduced the extent of the natural levee zone. The natural levees of Bayou La Loutre, in the area where the MRGO crosses it today, no longer support the hardwood vegetation as described in the above, but are characterized by shrubby subsiding levee vegetation including palmetto, marsh elder, sea oxeye, big cordgrass and roseau.

3.2.11.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Overall, some of the surrounding marsh is expected to be lost as the result of shoreline erosion. This opening of the shoreline could reduce the visual appeal of the area.

3.2.11.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

The rock material used to construct the total closure structure would stand in contrast to Bayou La Loutre's vegetated southern levee ridge. The total closure structure would be maintained, not allowing vegetation to take hold and grow in the rock. Closing the MRGO at Bayou La Loutre could also cause an increase in erosion along Bayou La Loutre's levee ridges as recreational boat traffic would utilize it to access the Gulf of

Mexico and other points of interest. Beneficially, the rock total closure structure would serve to break up the unnatural linear southeast MRGO viewshed.

3.2.11.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

The opening of the shoreline could reduce the visual appeal of the area compared to Alternative 1.

3.2.12 Navigation

Prior to completion of the MRGO, navigation in the vicinity was on the GIWW, the Mississippi River, and surrounding bays, lakes, and bayous. Ocean going vessels were restricted solely to the Mississippi River. Other vessels, ranging from tugs and barges to smaller motorized and sail craft, used waterways suitable for their draft.

The latest Waterborne Commerce Statistics Center (WCSC) data are available for 2005 (http://www.iwr.usace.army.mil/ndc/wcsc/pdf/wcusmvgc05.pdf) and 2006 (http://www.iwr.usace.army.mil/ndc/wcsc/pdf/wcusmvgc06.pdf). Traffic records from the WCSC show MRGO utilization steadily increasing until reaching a peak in terms of tonnage carried in 1978 and in terms vessel trips in 1982. Table 3.3 illustrates MRGO total domestic and foreign tonnage for the period 1977-2006. Table 3.3 contains data with 4-year increments from 1970-94 and 1995-06 continuous records (See Appendix B). Both tonnage and total vessels have decreased since that time.

Foreign-flag deep-draft vessel movements consist of self-propelled ocean-going vessels. Maximum loaded vessel drafts were approximately 36 feet with vessels taking advantage of advance maintenance and tides. For the period 1995-06, approximately 20 percent of vessels traveled with loaded drafts over 30 feet. Domestic cargo on the MRGO consists of shallow-draft barge traffic and coastwise ocean-going vessels. The maximum loaded drafts for the tow vessels are 12 feet or less and domestic coastwise vessels have maximum drafts in excess of 30 feet.

Comparison of tonnage volumes for the most recent period of record (2002-06) with the previous period (1992-94) shows current volumes down by nearly 60 percent, with drops in both domestic and foreign freight volumes. While total tonnage declined, the percentage of foreign freight maintained a larger share of total tonnage than domestic freight. The percentage of foreign freight represents approximately 85 percent of 1999-06 total tonnage. In spite of distributional changes, the overall trend illustrates a downturn for all traffic, with 2004 volumes representing an historic low before declining further in 2005 due to Hurricane Katrina. In 2006, volumes increased to greater than 2004 and 2005 volumes, but reflect a 48% decrease over 2003 levels. While the pre-Katrina declines were driven by a variety of factors, the MRGO authorized depth of 36 feet, which is recognizably shallow in comparison to some other U.S. Gulf Coast deep-draft channels, and the current dimensions of the IHNC Lock, are contributors. The IHNC Lock dimensions are 640 feet by 75 feet by 31.5 feet. The limitations of the MRGO, in terms of its 36-foot depth and the IHNC Lock likely impeded commercial navigation growth during periods of significant increases in the sizes of large vessels serving U.S. ports. The

lack of funds for operation and maintenance dredging during the 1990s, and the necessity to direct funds elsewhere for emergency dredging during the pre-Katrina years, is also likely to have contributed to declining trends.

Annual vessel trip totals are displayed in Table 3.4, which shows that cargo vessels have predominated. The number of trips has decreased since peaking in 1982 to a greater extent than has the tonnage, representing a move toward larger ships and bigger loads. Declines in annual MRGO vessel trip counts are also, of course, directly associated with the declining tonnage volumes as shown in Table 3.5.

Since its authorization, the size and draft of vessels using the MRGO has tended to increase to meet the competitive demand for more efficient movements of bulk commodities.

Note: For this report, the USACE is using the definition of deep-draft vessels contained in ER-1105-2-100. This defines deep-draft as those vessels requiring greater than 14 feet. The type of cargo vessel most often found on the MRGO is one that carries dry cargo. Very few tanker vessels use the MRGO.

As mentioned, cargo vessels are the predominant vessel type. Table 3.6 presents distribution of 2000 - 2004 freight tonnage by approximate vessel dead-weight tonnage (DWT) range, type, and beam width.

Table 3.3 MRGO Tonnage by Year (1000s short tons)

Year	Total Tonnage	Foreign	Domestic
1970	4,013	2,522	1,491
1974	5,308	3,386	1,922
1978	9,411	5,136	4,275
1982	5,572	3,878	1,694
1986	8,145	5,254	2,891
1990	7,084	4,611	2,473
1994	4,690	3,347	1,343
1995	5,701	3,416	2,285
1996	5,042	3,314	1,728
1997	5,253	3,552	1,701
1998	4,007	2,974	1,033
1999	5,369	4,619	750
2000	5,850	5,065	785
2001	4,173	3,634	539
2002	3,290	2,786	504
2003	2,847	2,442	406
2004	1,206	1,045	161
2005	741	676	65
2006	1,474	1,373	101

Source: U.S. Army Corps of Engineers, Waterborne Commerce Statistics Center.

Table 3.4 MRGO Number of Trips by Vessel Type (1970-2006)

Year	Total Trips	Passenger & Cargo Vessels (Dry and Liquid)	Tow or Tugboat	Barge (Dry and Liquid Cargo)
1970	4,809	1,476	1,220	2,113
1974	12,941	7,551	1,837	3,553
1978	17,956	11,828	1,841	4,287
1982	18,419	15,084	1,190	2,145
1986	6,212	1,941	1,460	2,811
1990	4,479	1,486	1,110	1,883
1994	5,130	3,006	903	1,221
1995	4,263	2,300	628	1,335
1996	6,934	5,433	519	982
1997	5,591	3,797	696	1,098
1998	2,827	1,700	462	665
1999	2,368	1,420	296	652
2000	2,386	1,541	188	657
2001	2,341	1,550	377	414
2002	2,590	1,693	488	409
2003	3,897	1,902	692	1,303
2004	2,584	1,972	447	164
2005	1,157	581	454	122
2006	868	215	461	192

Source: U.S. Army Corps of Engineers, Waterborne Commerce Statistics Center.

Table 3.5 MRGO Number of Trips by Vessel Type (Selected Years)

Year	Total Tonnage	Passenger & Cargo Vessels (Dry and Liquid)	Tow or Tugboat	Barge (Dry and Liquid Cargo)
1970	4,809	1,476	1,220	2,113
1974	12,941	7,551	1,837	3,553
1978	17,956	11,828	1,841	4,287
1982	18,419	15,084	1,190	2,145
1986	6,212	1,941	1,460	2,811
1990	4,479	1,486	1,110	1,883
1994	5,130	3,006	903	1,221
1995	4,263	2,300	628	1,335
1996	6,934	5,433	519	982
1997	5,591	3,797	696	1,098
1998	2,827	1,700	462	665
1999	2,368	1,420	296	652
2000	2,386	1,541	188	657
2001	2,341	1,550	377	414
2002	2,590	1,693	488	409
2003	3,897	1,902	692	1,303
2004	2,584	1,972	447	164
2005	1,157	581	454	122
2006	868	215	461	192

Source: U.S. Army Corps of Engineers, Waterborne Commerce Statistics Center

Table 3.6 MRGO Approximate Percentage of Foreign Freight by General DWT Range for Calendar Years 2000, 2002 and 2004

DWT Range Estimate	% of short tons	Predominate Vessel Type
<10,000	16%	Refrigerated Cargo Vessel
10,000-19,999	14%	General Cargo, Containership
20,000-39,999	29%	Containership, General Cargo
40,000-59,999	19%	Containership, Chemical Carrier
60,000-75,000	22%	Bulk Carrier
Total	100%	

Source: U.S. Army Corps of Engineers, Waterborne Commerce Statistics Center

Examination of the 1970-96 historical trends for ocean-going freight indicates general upward movement in volume of cargo per vessel trip. A general upward trend, with recognizable annual fluctuations, was evident until 1988. In addition to ocean-going freighters, a large number of tugs and towboats use the MRGO. The general increase in barge trips relative to tow trips suggests transition towards larger volumes per barge and per tow-barge movement. Tank barges of 298-foot x 54-feet are the most frequent size. The largest tows are generally 4-barge tows consisting of three 298-foot x 54-foot barges and one 150-foot x 54-foot barge pushed by towboats generally ranging from 1,800 to 3,000 horsepower.

Table 3.7 presents information about the type of commodities shipped through MRGO. In 2004 and 2006, the commodity groups with the greatest number of tons transported on the MRGO were 1) "Manufactured Equipment, Machinery and Products", 2) "Food and Farm Products", 3) "Chemicals and Related Products". For each of the groups, foreign commerce represented more than 80% of the group total.

Table 3.7 Composition of Tonnage (short tons), 2004 and 2006

	2004			2006		
Industry Group	**Total**	**Domestic**	**Foreign**	**Total**	**Domestic**	**Foreign**
Coal	0	0%	0%	0	0%	0%
Crude Petroleum	4	100%	0%	0	0%	0%
Petroleum Products	44	80%	20%	56	100%	0%
Crude Materials (exc. Fuels)	166	7%	93%	191	21%	79%
Food and Farm Products	292	0%	100%	569	0%	100%
Primary Manufactured Goods	251	14%	86%	117	3%	97%
Chemicals	109	18%	82%	484	0%	100%
Manufactured Equipment	323	17%	83%	22	0%	100%
All Others	17	0%	100%	35	0%	100%
TOTAL	1,206	13%	87%	1474	7%	93%

Source: U.S. Army Corps of Engineers, Waterborne Commerce Statistics Center

In FY06-07, Congress did not appropriate funds for dredging the MRGO between the GIWW and the Gulf of Mexico. As a result, the controlling depth of the channel is currently approximately 22 ft. This has allowed some deep-draft and all shallow-draft traffic to continue to operate on the channel. Deep-draft vessels are entering the MRGO light-loaded, calling on tidewater port facilities in New Orleans, and exiting through the IHNC Lock into the Mississippi River for outbound voyages. Some maritime interests have reported modifying vessel operations by moving products over to Mississippi River docks for loading. Other companies have adopted other operations modifications to continue commerce.

During times of extreme congestion of the IHNC Lock or when the lock is inoperable, some tows travel downstream on the Mississippi River to Baptiste Collette Bayou, exit Baptiste Collette Bayou into Breton Sound, and then enter the Inland Reach of MRGO. Eastbound tows then travel back inland on the MRGO to the GIWW Reach before continuing eastbound to locations in Mississippi, Alabama, and Florida. Westbound tows use the reverse route to avoid the IHNC Lock when it is congested or impassable.

Analysis of deep-draft navigation indicates that maintaining the authorized dimensions of the MRGO between the GIWW and the Gulf of Mexico is not cost-effective. Average annual operations and maintenance (O&M) costs to dredge a single shipping lane in the MRGO Inland Reach are $12.5 million. However, maintaining a single shipping lane, which is half of the authorized dimensions, only produces approximately $3.7 million per year in transportation efficiencies. Efforts to operate and maintain the fully authorized

dimensions (i.e. a two-lane channel 500 feet wide by 36 feet deep) would be even more costly and would not produce greater navigation benefits (see Appendix C). The analysis indicates that the maintenance of a deep-draft navigation channel, of any dimension, in the MRGO between the GIWW and the Gulf of Mexico is not economically justified.

The economic information available indicates that it is not cost effective to maintain shallow-draft navigation on the channel between the GIWW and the Gulf of Mexico in terms of National Economic Development (NED) criteria. The total average annual costs to maintain a 12 ft shallow-draft channel are approximately $6 million whereas the estimated average annual benefits are approximately $1.2 million.

3.2.12.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

It is expected that a MRGO channel maintained for deep-draft navigation would allow both deep and shallow-draft traffic to return to levels just prior to Hurricane Katrina and to continue at that level in the foreseeable future.

3.2.12.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Complete closure of the MRGO would eliminate all deep-draft and some shallow-draft commercial traffic along the waterway between the GIWW and the Gulf of Mexico. Recreational traffic may continue to use some sections of the channel.

Shallow-draft tows that traverse the IHNC Lock could not continue to use the MRGO as an alternate route during times of extreme congestion or unforeseen closures at the lock. Shallow-draft commercial traffic impacted by delays or lock closure could use some naturally deep alternative routes such as Baptiste Collette Bayou, Breton Sound and Chandeleur Sound to continue east-west traffic on the GIWW. The industry has expressed a willingness to continue working with the USACE and stakeholders to better identify these or other options.

3.2.12.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

After some period of time, probably about 2014, the MRGO would be closed to all deep-draft and shallow-draft commercial traffic along the waterway between the GIWW and the Gulf of Mexico. After that, impacts for would be the same as Alternative 1. Recreational and commercial fishing and oil field service traffic may continue to use some sections of the channel and surrounding waterways with adequate existing draft.

3.2.13 Business

The Port of New Orleans, the local sponsor, has historically dominated business activity along the MRGO. With the Mississippi River moving about 500 million tons of cargo each year – including chemicals, coal, timber, iron, steel and more than half of the nation's grain exports, the Port of New Orleans is one of America's largest gateways to the global market. In 2004, Board of Commissioners of the Port of New Orleans (PONO) tenants on the IHNC (Maersk SeaLand, New Orleans Cold Storage, Bollinger

Gulf Repair, Southern Scrap, Lafarge Corp., U.S. Gypsum Co., Halliburton Inc., and Holcim Inc.), generated $5 million in annual revenues for the Board.

Maritime-related industries and publicly and privately-owned facilities reliant on deep-draft access on the IHNC were profoundly impacted by Hurricane Katrina. Facilities were severely damaged and workers displaced. Disruptions were similar to those experienced by owners and employees in other business sectors affected by the storm. Two PONO tenants, Maersk SeaLand (France Road Terminal Berth 1) and CG Rail (Elaine St. Wharf), chose to discontinue operations in New Orleans and relocate to Mobile, Alabama, partly because maintained deep-draft access via the MRGO was no longer available. The USACE has no authority to compensate for these business relocations.

Remaining area businesses are still involved in the process of recovery. The IHNC port area is currently in a state of flux as some businesses seek to restore normal operations, others seek to ultimately relocate due to the unavailability of deep water access to the Gulf via the MRGO and new businesses seek to locate at newly available IHNC port facilities. Businesses that rely on shallow-draft vessel operations have essentially recovered back to pre-Katrina levels.

3.2.13.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

It is expected that facilities along the IHNC that depend on deep-draft access via the MRGO would, in time, recover to business activity just prior to Hurricane Katrina.

3.2.13.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

If the MRGO channel is blocked, some businesses in the IHNC area that depend on deep-draft access via the MRGO, may choose to relocate. Four facilities have been identified as falling into this category. The USACE has no authority to assist these businesses in relocation or to pay any costs.

3.2.13.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

If the MRGO channel is no longer maintained between the GIWW and the Gulf of Mexico several businesses in the IHNC area that depend on deep-draft access via the MRGO may chose to reestablish their operations elsewhere. Other maritime businesses may adapt their operations practices to utilize other area waterways and transportation systems to continue to conduct commerce from their existing locations.

3.2.14 Employment

Employment for Orleans Parish in the years 1999-2004, showed a marginal decline in the number of people employed. The figures presented in Table 3.8 indicate a 4.5 per cent decline in employment.

Employment for St. Bernard Parish in the years 1999-2004, showed an increase in the number of people employed. The figures presented in Table 3.8 indicate a 6.0 per cent increase in employment. Total employment for the two parishes showed an overall decline of 3.9 per cent.

Table 3.8 Pre-Katrina Employment

Pre-Katrina Employment						
Parish	1999	2000	2001	2002	2003	2004
Orleans	259,010	263,536	263,084	253,859	250,767	247,260
St. Bernard	16,409	16,029	15,738	16,436	21,318	17,386
Total	275,419	279,565	278,822	270,295	272,085	264,646

Source: Laworks.net

While overall employment declined for the two parishes, major industries utilizing the IHNC/MRGO have maintained stable employment in the years immediately proceeding Hurricane Katrina. After the hurricane, records developed for the Louisiana Recovery Authority show the impact on employment in Orleans and St. Bernard Parishes. The impact on local business activity has been devastating. Estimates show 27 percent of all Orleans Parish businesses failed after Hurricane Katrina and 42 percent of firms with five or fewer employees failed, while St. Bernard lost 54 percent of its businesses, the highest loss rate in the state (Louisiana Recovery Authority 2006).

Referring to Table 3.9, as a result of Hurricane Katrina and the subsequent flooding, Orleans Parish saw an immediate decline of 63,129 jobs, or 26.2 percent loss in employment. The decline continued into November 2005, where 97,468 jobs were lost, representing a decline of 40.6 percent. Except for January 2006, there has existed a slow but steady growth in jobs, yet latest figures (June 2006) still show a 36.4 percent reduction from its pre-Katrina level.

St. Bernard Parish saw an immediate decline of 6,975 jobs, or 40 percent loss in employment. The decline continued into November 2005, where 11,651 jobs were lost, representing a decline of 66.7 percent. Since November 2005, there has existed a steady growth in jobs, but latest figures (June 2006) still show a 54.1 percent reduction from its pre-Katrina level.

Employment by the seven principle businesses located along the MRGO/IHNC has declined markedly post-Katrina. Two of the seven firms have relocated outside the New Orleans area, representing a loss of 230 jobs. The remaining firms have had to adjust their employment based on the level of business they can generate given the deep-draft closure of the MRGO between the GIWW and the Gulf of Mexico and the inadequate size of the existing IHNC Lock for many ships.

3.2.14.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

It is expected that employment dependent on firms located along the IHNC/MRGO area that depend on deep-draft access via the MRGO would, in time, recover to levels just prior to Hurricane Katrina.

Table 3.9 Employment by Employers Subject to the Louisiana Employment Security Law

Employment by Employers Subject to the Louisiana Employment Security Law				
		Number	Percent Change from	
Parish	Month	Employed	Previous Month	August 2005
Orleans	July 2005	241,175		
	August 2005	241,264	0.04%	
	September 2005	178,135	-26.2%	-26%
	October 2005	143,796	-19.3%	-40.4%
	November 2005	143,332	-0.3%	-40.6%
	December 2005	149,425	4.3%	-38.1%
	January 2006	138,068	-7.6%	-42.8%
	February 2006	142,389	3.1%	-41.0%
	March 2006	148,070	4.0%	-38.6%
	April 2006	148,644	0.4%	-38.4%
	May 2006	150,446	1.2%	-37.6%
	June 2006	153,327	1.9%	-36.4%
St. Bernard	July 2005	17,569		
	August 2005	17,625	0.32%	
	September 2005	10,650	-39.6%	-40%
	October 2005	5,974	-43.9%	-66.1%
	November 2005	5,861	-1.9%	-66.7%
	December 2005	6,128	4.6%	-65.2%
	January 2006	6,960	13.6%	-60.5%
	February 2006	7,048	1.3%	-60.0%
	March 2006	7,306	3.7%	-58.5%
	April 2006	7,689	5.2%	-56.4%
	May 2006	7,847	2.1%	-55.5%
	June 2006	8,092	3.1%	-54.1%

Source: www.laworks.net

3.2.14.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

Firms dependent on deep-draft access via the MRGO could relocate if the channel is blocked between the GIWW and the Gulf of Mexico.. If firms were to relocate within the New Orleans geographic area, there would be little change in post-Katrina employment. If the firm were to relocate outside of the New Orleans area, local unemployment would increase.

3.2.14.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

Without an authorized and maintained deep-draft MRGO channel between the GIWW and the Gulf of Mexico, businesses in the area may chose to modify their employment practices or they may chose to move their companies elsewhere. If firms chose to relocate within the New Orleans geographic area, there would be little change in post-Katrina employment. If firms chose to relocate outside of the New Orleans area, local unemployment would increase.

3.2.15 Community Cohesion

Prior to Hurricane Katrina, political leaders and residents of St. Bernard Parish have petitioned for the closure of the MRGO, citing concerns over erosion, loss of wetlands and hurricane protection, particularly with respect to storm surges.

Hurricane Katrina caused tremendous damage to five parishes in the Greater New Orleans area. Many residents of the affected areas, especially St. Bernard and Orleans Parishes, identify storm surge along the MRGO as the cause for the devastating damage to their property and lives. Flooding resulted in the loss of life, property damage, business losses, and the relocation of residents. Many residents of affected communities have joined together to call for the closure of the MRGO channel.

3.2.15.1 Future Without De-authorization Conditions (continuation of the existing deep-draft channel with authorized width)

Residents of the affected areas of Orleans and St. Bernard Parishes would continue to argue for the closure of the MRGO, citing damages they attribute to the storm surge that occurred during Hurricane Katrina.

3.2.15.2 Alternative 1 – Construct a Total Closure Structure Across the MRGO Near Bayou La Loutre Immediately

A majority of the residents living in affected areas of Orleans and St. Bernard Parishes would likely agree that an immediate closure of the MRGO would provide the greatest level of protection for their communities.

3.2.15.3 Alternative 3 - Cease All MRGO Operations and Maintenance Dredging Activities Immediately

While discontinuance of dredging would alleviate the concerns of some residents of the affected areas of Orleans and St. Bernard Parish, many would continue to argue for an immediate closure of the MRGO, maintaining that the waterway remaining open for some period of time would still represent a threat to their communities.

3.3 COMPARISON OF IMPACTS

Table 3.10 provides a summary of the environmental impacts evaluated in this document.

Table 3.10 Comparison of Impacts

Significant Resource	Existing conditions	Future-without de-authorization.	Alternative 1 Total Closure	Alternative 3 All operations and maintenance ceased
Water Quality – Salinity	Construction of MRGO and other factors increased salinity in Pontchartrain Basin.	Salinity should stay stable in Mid-Basin and might increase in Lower Basin as land loss from various causes continues.	Slightly reduced salinity throughout project area soon after closure. Modeling indicates greatest reduction could be at Alluvial City - 6.0-6.6 ppt. Salinity stratification north of the structure would be reduced and it is expected that the size of the H-A zone could shrink.	Salinity unlikely to become lower for several years until much of the channel shoals
Vegetation - Wetland Loss	From 1956 to 1990, approximately 68,660 acres of wetlands were lost in the Project Area. Approximately 91 acres of wetlands are lost per year on the unprotected north bank of the MRGO due to erosion. About 38 acres of wetlands were created yearly by beneficial use of dredged material before Katrina.	Wetlands could be created when the channel is dredged to authorized dimensions and more wetlands could be created each year. These could be lost at the background loss rate of the area and at the end of 50 years there could be 2,702 acres of created wetlands remaining. Erosion on the north bank is likely to cause the loss of 4,565 acres of marsh. Net loss over 50 years could be 2,343 acres of marsh.	There would be no beneficial use dredged material to create marsh. Removal of deep and shallow-draft vessels is anticipated to reduce the erosion of marsh on the north bank. Marsh loss could be decreased by a significant percentage of the 2,343 acre net loss of the future without.	More marsh loss than Alternative 1, but probably significantly less than future without.
Vegetation – Habitat Type	Wetland habitat types generally determined mainly by salinity. Drought, and human-induced causes can change habitat type.	Habitat types are expected to generally remain as they are at present. Saline marsh could move north along the MRGO.	No large-scale change in vegetation type. It is possible that the Lake Borgne Land Bridge could change from saline marsh to brackish marsh. Central Wetlands could possibly have more intermediate marsh and cypress.	Habitat types are expected to remain generally as they are at present.
Wildlife	Wintering waterfowl and furbearers have declined since about 1970, however are still present.	Estimated loss of marsh could reduce numbers of waterfowl, furbearers and other wildlife that are marsh-dependent	Reduction in marsh loss could increase abundance of marsh-dependent wildlife compared to the future without. Reduced salinity north of the closure could improve the area slightly for waterfowl.	Less of an increase of marsh-dependent wildlife than Alternative 1. Habitat for waterfowl and furbearers is anticipated to stay as it is now.
Fisheries – Fish	After about 1970, 22 species of freshwater fish were	Could be slight decline in estuarine-dependent fish due to marsh loss.	Could be slight increase in estuarine-dependent fish compared	Slightly less increase in estuarine-dependent fisheries when compared to

Significant Resource	Existing conditions	Future-without de-authorization.	Alternative 1 Total Closure	Alternative 3 All operations and maintenance ceased
and Shellfish	apparently no longer found in the Biloxi Marshes/Lake Borgne area. However six important sport fish seemed to be present in approximately the same numbers as prior to about 1970. H-A zone in Lake Pontchartrain causes reduced benthic community during the H-A event.	Salinity should not change significantly so fishery distribution might remain approximately as at present. Six most important sport fish could be present in approximately the same numbers as exist now. It is likely that the H-A zone in Lake Pontchartrain could remain as it is at present.	to the future without. Fish have alternate routes, so passage up and down the MRGO should not be blocked by closure. Six most important sport fish should be present in approximately the same numbers as exist now. Salinity stratification would be reduced north of the total closure which is expected to allow the H-A zone in Lake Pontchartrain to shrink. Large *Rangia* and other benthos could colonize the area which should lead to increased fishery production in a portion of the lake.	the future without than Alternative 1 Six most important sport fish should be present in approximately the same numbers as exist now. Large Rangia clams and other benthos expected to remain absent from the "H-A zone." fisheries in lake could remain as they are today.
Essential Fish Habitat (EFH)	MRGO channel, adjacent waters and marshes and Lake Pontchartrain are EFH	Bottom habitat in MRGO would be temporarily disturbed by dredging. Possible net loss of 2,343 acres of marsh which is valuable EFH.	Less than 17 acres of EFH on the bottom of the MRGO would be destroyed by the closure structure. There are alternate routes so passage of managed species up and down the MRGO might not be blocked by the closure. It is possible that this alternative could have significantly less loss of marsh EFH than the future without.	Compared to future without, this alternative is expected to significantly decrease future marsh EFH loss, but decrease is not likely to be as much as that in Alternative 1.
Threatened and Endangered Species (T&E)	Brown pelicans have not nested on Breton Island in the recent past. Beneficial use has nourished Breton Island and piping plovers have utilized the island. Sea turtles in agreed-upon numbers have been taken in the Bar Channel. Detailed contract specifications to protect the sturgeon, manatee and sea turtles have been used. Maintenance of the channel did not adversely affect T&E species.	Brown pelicans have not nested on Breton Island in the recent past. Piping plovers might occasionally use Breton Island. Sea turtles in agreed-upon numbers might continue to be taken in the Bar Channel. Detailed contract specifications to protect the sturgeon, manatee and sea turtles would continue. Maintenance of the channel should not adversely affect any T&E species.	Brown pelicans have not nested on Breton Island in the recent past. Piping plovers occasionally use Breton Island. There are nearby habitats that might be similar to Breton Island. No sea turtles would be taken in the Bar Channel. Alternate routes are available so passage for sturgeon, manatee and sea turtles should not be blocked by closure structure. Detailed contract specifications to protect the manatee and sturgeon would continue. Every effort would be made to construct the closure during the May through September window when the	This alternative is not likely to adversely affect any endangered or threatened species.

Significant Resource	Existing conditions	Future-without de-authorization.	Alternative 1 Total Closure	Alternative 3 All operations and maintenance ceased
			sturgeon are in the rivers. The closure structure is not likely to adversely impact any T&E species. .	
Natural and Scenic Rivers	Seven scenic bayous in project area.	No impact.	No impact.	No impact.
Air Quality	St. Bernard Parish classified in attainment of all NAAQS.	Ambient air quality is likely to be temporarily impacted during dredging.	Ambient air quality is likely to be temporarily impacted during construction.	No impact.
Recreation	Fewer freshwater fish present after about 1970. Six most important sport fish present in good numbers. Waterfowl hunting less productive than before about 1970 in St. Bernard Parish	Hunting and fishing could slightly decrease due to anticipated marsh loss.	Waterfowl hunting and estuarine dependent fishing could be slightly positively impacted compared to the future without.	Salinity above La Loutre ridge unlikely to change, thus hunting and fishing success could be less than Alt. 1
Cultural	Entire area in vicinity of closure has been inventoried.	USACE has met with SHPO and determined that maintenance of the channel would not have an adverse effect on historic properties.	USACE has met with SHPO and determined that construction of the closure would not have an adverse effect on historic properties.	USACE has met with SHPO and determined that this alternative would not have an adverse effect on historic properties.
Aesthetic	Natural levee ridges of Bayou La Loutre have subsided and no longer support the trees they once did. Marsh has been lost due to channels, canals and subsidence. Area now dominated by forms not natural to the tidal marsh environment.	General loss of marsh could occur, reducing visual appeal.	The closure structure could cause an unnatural break in the vegetated La Loutre ridge. The closure structure should serve to break up the unnatural linear southeast MRGO viewshed.	There would be no structure to cause an unnatural break or break up the unnatural viewshed.
Navigation	MRGO tonnage peaked in 1978, trips in 1982. In 2004 tonnage was 13% of that in 1978 and trips were14% of 1982.	Deep- and shallow-draft traffic would return to pre-Katrina levels.	Both deep-draft and shallow-draft shipping would be eliminated. Shallow-draft tows that use MRGO as an alternate route when the IHNC is congested or unexpectedly closed could no longer do so.	Shallow-draft could continue until about 2014. Then impacts would be the same as Alt. 1

Significant Resource	Existing conditions	Future-without de-authorization.	Alternative 1 Total Closure	Alternative 3 All operations and maintenance ceased
Business	Katrina stopped deep-draft access, except through the IHNC Lock, many maritime related businesses in area severely impacted. Two chose to relocate to Mobile. Others are trying to recover; some may plan to relocate. Shallow-draft facilities essentially recovered.	Facilities along the IHNC that rely on deep-draft would, in time, recover to pre-Katrina levels.	Businesses that depend on deep-draft may choose to relocate. Businesses that rely on shallow-draft would have the added expense of using the Mississippi River to access their facilities. The USACE has no authority to relocate impacted businesses.	Businesses that depend on deep-draft may choose to relocate. Businesses that rely on shallow-draft would have the added expense of using the Mississippi River to access their facilities about 2014. The USACE has no authority to relocate impacted businesses.
Employment	Post-Katrina 230 jobs lost from MRGO-IHNC area due to relocation and other businesses downsizing. Orleans Parish shows 34.6% reduction from pre-Katrina jobs and St. Bernard shows 54.1% reduction.	In general, Orleans and St. Bernard Parishes may never return to pre-Katrina employment. Employment in MRGO-IHNC area should, in time, recover to pre-Katrina levels.	More deep-draft firms would relocate, if in New Orleans, no impact; if outside, loss of employment. Shallow-draft firms might use the Mississippi River or relocate.	More deep-draft firms would relocate, if in New Orleans, no impact; if outside, loss of employment. After 2014, shallow-draft firms might use the Mississippi River or relocate
Community Cohesion	Many residents of St. Bernard and Orleans blame MRGO for storm surge that did devastating damage to property and lives. Majority demanding closure.	Residents of St. Bernard and Orleans would continue to vociferously demand closure.	Majority of residents of St. Bernard and Orleans Parishes would continue to be concerned about presence of MRGO. Most residents of St. Bernard and Orleans would agree that closure would provide the greatest protection to their communities	While discontinuance of dredging would alleviate concerns of some, majority would continue to vociferously demand closure

3.4 CUMULATIVE EFFECTS ANALYSIS

3.4.1. Cumulative Effects Background

The primary goal of cumulative effects analysis (CEA) is to determine the magnitude and significance of the environmental consequences, adverse or beneficial, of the proposed alternatives in the context of the cumulative effects of other past, present, or reasonably foreseeable future actions.

The spatial component considered for this CEA is within the Pontchartrain Basin as depicted on Figure 3.2. The portion of the boundary illustrated around Lake Pontchartrain essentially represents the transition between non-estuarine and estuarine influenced habitat. The remaining boundary was determined by identifying physical barriers (such as a ridge or levee) and the open waters of Breton Sound that have been impacted directly through the operation and maintenance of the navigation channel in Breton Sound (represented by the dashed line). The temporal component to be considered for this CEA is the beginning of construction of the MRGO in the early 1960's through a typical USACE fifty year project evaluation period. A qualitative checklist for the identification of potential cumulative effects of the Future Without alternatives as well as alternatives 1 and 3 of this proposed legislative action are included as Tables 3.11, 3.12, and 3.13 respectively.

Cost considerations and technical limitations preclude the USACE from obtaining the information necessary to quantify cumulative impacts to any significant resource. However, in this case, a qualitative analysis of cumulative impacts is sufficient to inform a reasoned choice among alternatives. The use of a plus/minus system as a gauge is based upon best professional judgment and knowledge of past, present and reasonably foreseeable future actions within the described and illustrated spatial boundary. A key is included in Tables 3.11, 3.12, and 3.13 describing relative potential for beneficial or adverse impacts. This checklist approach to analyzing cumulative impacts is an accepted methodology described further in the 1997 CEQ handbook for *Considering Cumulative Effects Under the National Environmental Policy Act* (Appendix A).

Table 3.11 Checklist for Identification of Cumulative Effects of Future Without Alternative

Checklist for Identification of Cumulative Effects of the Future Without Alternative.						
	Future Without					
Potential Impact Area	Construction	Operation	Past actions	Other Present Actions	Future Actions	Cumulative Impact
Water Quality	=	+	---	=	+	=
Fisheries	=	=	---	+	+	=
Wetland Vegetation	+	-	---	+	+	+
Wildlife	=	-	---	=	+	-
Essential Fish Habitat	-	-	--	+	+	-
Threatened and Endangered Species	=	=	-	+	+	=
Natural and Scenic Rivers	=	=	=	=	=	=
Air Quality	=	=	=	=	=	=
Recreation	-	-	-	+	+	-
Cultural	=	=	-	+	+	=
Aesthetics	=	-	-	+	+	=
Navigation	-	-	++	=	=	=
Economics	=	=	=	+	+	=
Key:	- low adverse effect		-- moderate adverse effect		--- high adverse effect	
= no effect	+ low beneficial effect		++ moderate beneficial effect		+++ high beneficial effect	

Table 3.12 Checklist for Identification of Cumulative Effects of Alternative 1

Checklist for Identification of Cumulative Effects of Alternatives 1.						
	Alternative 1					
Potential Impact Area	Construction	Operation	Past actions	Other Present Actions	Future Actions	Cumulative Impact
Water Quality	=	++	---	=	+++	++
Fisheries	=	+	--	+	++	+
Wetland Vegetation	+	+	---	++	+++	++
Wildlife	=	+	--	+	+	=
Essential Fish Habitat	-	=	-	+	+	+
Threatened and Endangered Species	=	=	-	+	+	=
Natural and Scenic Rivers	=	=	=	=	=	=
Air Quality	=	=	=	=	=	=
Recreation	-	=	-	+	+	=
Cultural	=	=	-	+	+	=
Aesthetics	=	=	-	+	+	=
Navigation	-	-	+++	=	=	=
Economics	=	=	+	+	+	+
Key:	- low adverse effect		-- moderate adverse effect		--- high adverse effect	
= no effect	+ low beneficial effect		++ moderate beneficial effect		+++ high beneficial effect	

Table 3.13 Checklist for Identification of Cumulative Effects of Alternative 3

Checklist for Identification of Cumulative Effects of Alternative 3.						
	Alternative 3					
Potential Impact Area	Construction	Operation	Past actions	Other Present Actions	Future Actions	Cumulative Impact
Water Quality	=	+	---	=	++	+
Fisheries	=	+	--	+	+	=
Wetland Vegetation	=	+	---	+	++	+
Wildlife	=	+	--	+	+	=
Essential Fish Habitat	-	=	-	+	+	+
Threatened and Endangered Species	=	=	-	+	+	=
Natural and Scenic Rivers	=	=	=	=	=	=
Air Quality	=	=	=	=	=	=
Recreation	-	=	-	+	+	=
Cultural	=	=	-	+	+	=
Aesthetics	=	=	-	+	+	=
Navigation	-	-	+++	=	=	=
Economics	=	=	+	+	+	+
Key:	- low adverse effect		-- moderate adverse effect		--- high adverse effect	
= no effect	+ low beneficial effect		++ moderate beneficial effect		+++ high beneficial effect	

Past actions within the spatial and temporal boundaries identified include construction of the MRGO navigation in the early 1960's, maintenance and operation of the channel, and environmental restoration projects in proximity to the channel. Other present and future actions (those projects authorized and/or funded) within the spatial and temporal boundaries identified, include projects planned for coastal environmental improvements that are a part of the Coastal Impact Assistance Program, CWPPRA, and proposed measures to be undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 in Title II, Chapter 3 of Public Law 109-234. Additional future actions within the spatial and temporal boundaries identified possibly include projects approved as a part of LCA and the potential for increased hurricane protection enhancement in the vicinity of the Inner Harbor Navigation Canal (Public Law 109-234).

Plans, or alternatives, being developed and analyzed through LACPR will be presented to Congress. An associated programmatic environmental impact statement is currently being prepared. Due to the current status of the LACPR effort, it is worth mentioning in cumulative effects. However, because of the speculative nature of the LACPR, the alternatives will not be included in this analysis.

Additionally, the state of Louisiana has developed and adopted a conceptual state master plan for the protection and restoration of coastal Louisiana called *Louisiana's Comprehensive Master Plan for a Sustainable Coast*. Because the state master plan has been adopted by the state of Louisiana it must be noted within the context of CEA. However, the state master plan is conceptual and subject to change on an annual basis. Although the document describes implementation, it is not clear what mechanisms, particularly state action and funding, would be used to actually implement any measures. Therefore, the inclusion of the state master plan in this CEA is noted, but the effects of any proposed recommendations are not included in determining the outcome of cumulative effects.

3.4.2. Summary of Cumulative Effects.

Future Without De-authorization

No real change or adverse environmental cumulative effects are anticipated for all resources, except for wetland vegetation, are anticipated. The reasoning, or rationale, for assigning low beneficial cumulative effects for the resources just mentioned is the additive effect of past and present actions combined with this alternative. It is estimated that the Future Without alternative is unlikely to influence salinity or marsh vegetation types or reduce the "H-A zone" in Lake Pontchartrain. However, ecosystem restoration measures, such as a freshwater diversion structure at Violet, could be more difficult to implement than under Alternative 1. For example, without a structure in the MRGO channel, a much larger freshwater diversion would be required at Violet, which would increase cost significantly and decrease the ability to control desired environmental results within the greater Pontchartrain Basin. Overall, the potential cumulative impact for the Future Without alternative is unchanged, or slightly negative.

Alternative 1

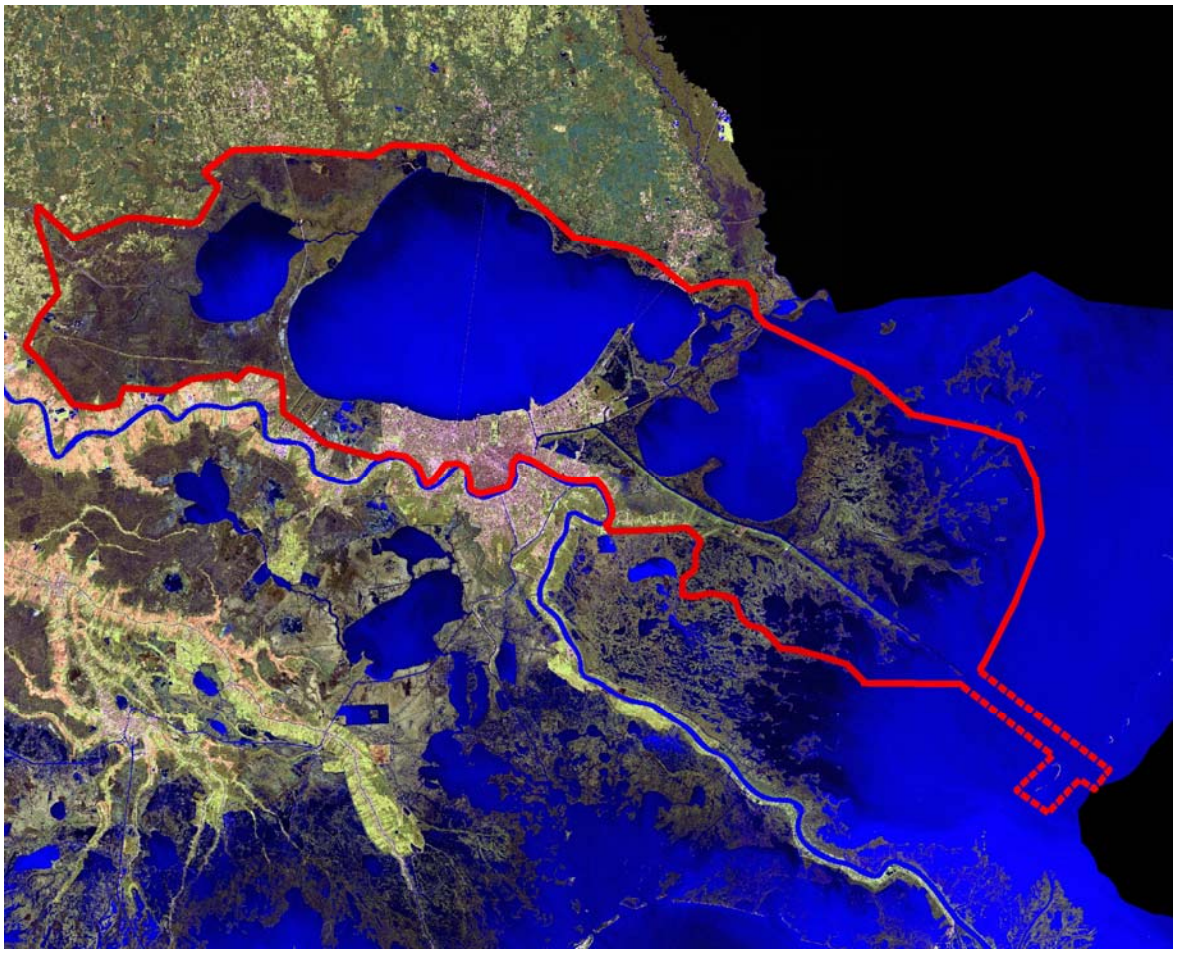
Positive environmental cumulative effects are anticipated for water quality, fisheries, wetland vegetation, essential fish habitat, and economics. For water quality and wetland vegetation, the cumulative effects would be moderately beneficial primarily due to potential future projects within the spatial boundary that would be conducive for improving water quality and wetland vegetation resources. For instance, a proposed diversion from the Mississippi River in the vicinity of Violet, Louisiana would direct freshwater into an area north of the closure structure. The combined action of the total closure and the diversion would likely further reduce salinities north of the structure. This salinity reduction could promote the re-growth of Cypress in the Central Wetlands and the re-establishment of fresh and intermediate marsh in some proximity to the diversion outfall and the closure structure. The rationale for not assigning a high beneficial effect as a result of cumulative effects is due to other past (i.e., construction of the MRGO) or present actions (i.e., no beneficial use of dredge material due to no dredging of the MRGO) actions that have had or continue to have an adverse effect or no effect at all on these particular resources. Furthermore, the same reasoning can be applied to the remaining resources receiving a low beneficial effect (fisheries, essential fish habitat, and economic resources). Those resources received a low beneficial

cumulative effect not because future projects potentially provide a lower cumulative effect, but because of past (i.e., construction of the MRGO) and present actions (i.e., no beneficial use of dredge material due to no dredging of the MRGO) within the temporal boundary of the CEA. Overall, the potential cumulative impact for Alternative 1 is a slightly beneficial effect.

Alternative 3

Positive environmental cumulative effects are anticipated for water quality, wetland vegetation, and economics. The reasoning, or rationale, for assigning low beneficial cumulative effects for the resources just mentioned is the additive effect of past and present actions combined with this alternative. It is estimated that Alternative 3 is unlikely to influence salinity or marsh vegetation types or reduce the "H-A zone" in Lake Pontchartrain until the MRGO channel has shoaled sufficiently enough to limit tidal flows. Cumulative impacts for all other resources would be expected to remain nearly the same over the same period of evaluation. Overall, the potential cumulative impact for Alternative 3 is unchanged, except for the resources identified earlier in this paragraph.

Figure 3.2 – CEA Spatial Boundary



SECTION 4 PUBLIC AND AGENCY INVOLVEMENT

4.1 INTRODUCTION

This section documents details of the study's public involvement and coordination efforts with Federal, state, local agencies and entities, parishes, and other interested parties. Chapter 5 describes the study's compliance with environmental requirements, including coordination with the U.S. Fish and Wildlife Service.

Scoping is not required for a LEIS, however, in conducting this study the USACE emphasized efforts to allow open and broad participation in the planning process. Federal, state and local government parties and other organizations were invited to help formulate plans for de-authorization of the MRGO and environmental restoration in the area influenced by the MRGO. Several groups did develop such plans.

A public meeting was held on October 18, 2006 to present the study process and accept comments. Another public information meeting was held on May 19, 2007 to present alternatives evaluated in detail and the Recommended Plan and to accept questions and comments. All comments made during the 45-day public comment period will be incorporated into an Addendum to the LEIS.

In addition, there is an interactive web page (http://mrgo.usace.army.mil/) that provides a library of project information, materials from stakeholder meetings, and a comment button allowing the public to submit questions or information to the study team.

4.2 STAKEHOLDER PARTICIPANTS

Stakeholder participants included, but were not limited to:

St. Bernard Parish
Governor's Office of Coastal Activities
Governor's Advisory Commission on Coastal Restoration and Conservation
Louisiana Coastal Protection and Restoration Authority
Louisiana Department of Natural Resources
Louisiana Department of Transportation and Development
Louisiana Department of Wildlife and Fisheries
Environmental Protection Agency
United States Coast Guard
Maritime Administration (MARAD)
United States Fish and Wildlife Service
Port of New Orleans
Gulf Intracoastal Canal Association
Lake Pontchartrain Basin Foundation
Coalition to Restore Coastal Louisiana
Gulf Restoration Network
American Rivers
Sierra Club
Biloxi Marshlands Corporation

Steamship Association of Louisiana
Gulf States Maritime Association
Bring New Orleans Back Commission
New Orleans Business Council
LSU Hurricane Center
National Aeronautic and Space Administration
Sierra Club
Lake Borgne Basin Levee District
Levees.org
National Wildlife Federation
Louisiana Wildlife Federation
Southeast Louisiana Flood Protection Authority-East
Environmental Defense
National Audubon Society
The Nature Conservancy
Federal Emergency Management Agency
Louisiana Environmental Action Network
City of New Orleans
Local and regional businesses
Private citizens

4.3. STAKEHOLDER MEETINGS

During 2006, USACE, New Orleans District held a series of eight public stakeholder forums to identify various plans and proposals for the future of the MRGO. Meetings included technical presentations and open discussions on topics including wetlands, navigation, storm protection, and the local economy. Each stakeholder group was invited to make detailed presentations on any plans they developed. Four stakeholder groups (St. Bernard Parish, Lake Pontchartrain Basin Foundation, Bring New Orleans Back Commission and Biloxi Marshlands Corporation) submitted their plans for consideration in development of the Interim Report. These plans included measures to close or modify the MRGO, for hurricane protection and for coastal restoration. These plans are described later in Section 4. In the end, there were 16 consensus measures supported by many stakeholders (see Section 4.4.5). However, the different stakeholders could not agree on a comprehensive plan to close the channel. Their recommendations varied from total closure to a sector gate with a draft of 28 feet. Many of the measures from the stakeholder plans were incorporated into the Interim Report to Congress.

A ninth stakeholder forum was held on April 16, 2007, following the release of the Interim Report to Congress and publication of the Notice of Intent to prepare a LEIS. Navigation interests were concerned that none of the alternatives evaluated in detail maintained continued shallow-draft navigation. They were disturbed there would no longer be an alternate route when the IHNC Lock was congested or be inoperable. On the other hand, St. Bernard Parish officials spoke out very strongly in favor of total closure as soon as possible. The representative from the Holy Cross Neighborhood Association did not want the IHNC Lock Replacement fast tracked as part of the MRGO de-authorization.

Another stakeholder forum was held on May 8, 2007. At that meeting the USACE team provided an overview of preliminary details developed on each of the alternatives evaluated in detail. In addition, the USACE announced a target report and LEIS completion schedule and provided an update on the ongoing in-house review of the draft Final Report to Congress and draft LEIS. Stakeholders from the shallow-draft navigation industry made brief comments on the direction of the study and asked for consideration for an emergency alternative navigation route in times of high congestion or prolonged maintenance of the IHNC Lock. Stakeholders from St. Bernard Parish offered some potential alternative routes. The USACE agreed to facilitate further discussions between the parties with the goal of resolving the issue prior to completion of the Final Report to Congress.

4.4 STAKEHOLDER PLANS

The State of Louisiana, Federal agencies, environmental organizations, planning groups, businesses, and individuals have developed plans for coastal protection and restoration that include MRGO related components. In some cases, the plans are specific to the MRGO area; in others, the channel is merely a component of larger proposals. In conducting this study the USACE invited stakeholders to present their plans as part of efforts to identify common approaches to help achieve consensus. The following non-Federal plans and studies are highlighted given their relevance to this de-authorization study.

4.4.1 St. Bernard Parish Plan

The features of the St. Bernard Parish Plan in the vicinity of MRGO are summarized below and the plan is available on the internet at http://www.sbpg.net/.

1) Construct Five Floodgates: at Seabrook, on the GIWW, on MRGO near Bayou Bienvenue, on Bayou Dupre at Lake Borgne, and on the MRGO near Verret.
2) New Bankline Stabilization on the entire shore of Lake Borgne.
3) Breakwaters in Lake Borgne.
4) Restore La Loutre Ridge to +8 feet.
5) Total Closure of MRGO by a structure at the Bayou La Loutre Ridge.
6) Rock Dike Closure of MRGO near Lake Athanasio.
7) Total Closure of Alabama Bayou at MRGO.
8) Freshwater Diversion from Mississippi River at Violet and another site.

USACE Comments on the above measures:

1) Some of these are being considered under other efforts to improve IHNC storm protection.
2) Stabilization on some of the shore of Lake Borgne is proposed as part of operation and maintenance activities authorized under Public Law 109-234.
3) These are being considered under LACPR.
4) This is being considered under LACPR.
5) This is the Recommended Plan.

6) The USACE proposes that only one structure on the MRGO near Bayou La Loutre is needed (see discussion of evaluation and elimination of Interim Report Alternative 2b in Sections 2.2 and 2.4 of this report).
7) This is being considered under LACPR.
8) This is being considered under LACPR.

Other Features

- Construct new levee connecting the five proposed floodgates on the GIWW and MRGO to existing levees on the SW shore of MRGO to +17 feet.
- No Closures at Rigolets and Chef Pass.
- Raise levee that is parallel to the SW shoreline of the MRGO to +17.5 feet and other levees surrounding the Parish to +20 feet.
- Construct New Levee connecting the southernmost levees in the Parish to existing levees on the Mississippi River. Height should be +17.5 feet.
- Continue construction of 40 Arpent Levee through Verret.
- Raise Both Sides of River Levee.
- Construct New River Floodgate at Bohemia.
- Remove Old Grand Prairie Levee.
- Biloxi Marsh Restoration Plan with measures to protect and enhance existing marsh as well as create additional marsh.
- Dredge and maintain Baptiste Collette Bayou.
- Construct new channel from Baptiste Collette Bayou to Gulfport Ship Channel.
- Restore Breton and Chandeleur Island Chain with dredged material from proposed channel.
- Breakwaters to protect the Chandeleur Islands.

USACE Comments on the above measures: These are being considered under LACPR.

4.4.2 LAKE PONTCHARTRAIN BASIN FOUNDATION PLAN

The Lake Pontchartrain Basin Foundation (LPBF) has developed a comprehensive habitat management plan that includes measures related to the MRGO. Those features are highlighted below and the full plan is available on the internet at http://www.saveourlake.org/.

1) Constriction of the MRGO channel at the Bayou La Loutre Ridge to 12 feet by 125 feet.
2) Restoration of Bayou La Loutre ridge.
3) Introduction of freshwater into the system through a diversion off the Mississippi River at the Violet Canal.
4) Armoring of eroding shorelines on the north bank of MRGO and on Lake Borgne
5) Reduction of ship speed on the Inland Reach.
6) Constriction of Bayou Dupre at Lake Borgne.
7) Utilization of previously dredged material for marsh creation.
8) A sill at Seabrook.
9) Discontinuation of advanced maintenance on the MRGO.
10) Utilization of dredged material in a beneficial manner.

USACE comments on the above measures:

1) This plan was eliminated from further study because shallow-draft is not economically justified.
2) This is being considered under LACPR.
3) This is being considered under LACPR.
4) Stabilization on some of the shore of Lake Borgne is proposed as part of operation and maintenance activities authorized under Public Law 109-234.
5) Under the Recommended Plan, this is probably not necessary.
6) This is being considered under LACPR.
7) This is being considered under LACPR.
8) This is being considered under other efforts to improve the Inner Harbor Navigation Canal storm protection.
9) Under the Recommended Plan, this is not necessary.
10) This is being considered under LACPR.

4.4.3 Bring New Orleans Back Commission Plan

The features of the Bring New Orleans Back Commission recovery plan located near MRGO are summarized below and the plan is available on the internet at http://www.bringneworleansback.org/.

1) Sector gates Seabrook, GIWW, and MRGO at Bayou Dupre with leaky levee between the latter two.
2) Heightening and armoring of existing levees on the MRGO.
3) A new levee on the eastern shore of the MRGO or the placement of surge barriers across Lake Borgne.
4) A normally closed deep-draft sector gate in the MRGO with a draft of approximately 28 feet.
5) Reintroduction of freshwater.
6) Rebuilding the La Loutre landbridge.
7) Restoration of the Biloxi Marsh.
8) Armoring the MRGO banks to stop erosion.
9) Aggressive use of dredged material to build land.
10) Vessel speed control.

USACE comments on the above measures:

1) This is being considered under the Inner Harbor Navigation Canal Floodgates Conceptual Study, 2006.
2) This is being considered under LACPR.
3) These are being considered under LACPR.
4) The Recommended Plan is a total closure structure near Bayou La Loutre.
5) This is being considered under LACPR.
6) This is being considered under LACPR.
7) This is being considered under LACPR.
8) This is being considered under LACPR.
9) This is being considered under LACPR.

10) Under the Recommended Plan, this is probably not necessary.

4.4.4 Biloxi Marshlands Corporation Plan

A private company, the Biloxi Marshlands Corporation, owns large tracts of wetlands in the vicinity of the MRGO and has developed a conservation and management plan for their holdings. Features of the company's plan in the vicinity of MRGO are summarized below and the plan is available on the internet at http://www.biloximarshlandscorp.com/.

1) Bayou La Loutre Ridge bank armament on both sides of the bayou.
2) Marsh creation and terracing.
3) Two water control structures in the MRGO.
4) Ridge refurbishment.
5) Vegetative plantings.
6) Massive freshwater diversion.
7) Restore the MRGO to "original" 500-ft width and fill the rest.

USACE comments on the above measures:

1) This is being considered under LACPR.
2) This is being considered under LACPR.
3) The USACE proposes that only one structure on the MRGO near Bayou La Loutre is needed (see discussion of evaluation and elimination of Interim Report Alternative 2b in Sections 2.2 and 2.4 of this report).
4) This is being considered under LACPR.
5) This is being considered under LACPR.
6) This is being considered under LACPR.
7) This is infeasible from an engineering viewpoint because it would involve 45-foot or longer sheet piles to keep the fill out of the reduced channel. It is also prohibitively expensive.

Other features of the Biloxi Marshlands Corporation Plan:

- Chandeleur Islands: annual vegetative plantings, introduction of sediment to the system, and the use of breakwaters, groins, and shoreline armoring to protect the existing islands.
- Northeastern Outlying Islands: bank armament and vegetative plantings and marsh creation/nourishment.
- Lower Biloxi Marsh: water control structures, bank armament, marsh creation, terraces, and vegetative plantings.
- Upper Biloxi Marsh: bank armament, marsh creation, terracing, and vegetative plantings of areas impacted by muskrat.

USACE Comments on the above measures: These are being considered under LACPR.

4.4.5 Stakeholder Consensus Items

The four previously identified stakeholders, as well as members of industry, met after their individual plans were developed. Many of the non-Federal interests including the Coalition to Restore Coastal Louisiana (CRCL) identified opportunities for consensus.

These items take into consideration a priority for public safety, while also including opportunities for ecosystem restoration and protection as well as economic development. The consensus items include:

1) Overall, establish Habitat Goals of returning the landscape to historic (1912-1932) pre-MRGO conditions (strategies to return wetlands to pre-MRGO conditions).
2) Restore Bayou La Loutre Ridge east of the MRGO to Christmas Camp Lake with introduced sediment and replanting of forest.
3) "Something" located in the MRGO at the Bayou La Loutre Ridge. There were numerous suggestions but no consensus as to what this "something" needs to be.
4) Restoration and protection of the Chandeleur Islands with beach nourishment and armoring.
5) Restoration and protection of the Biloxi Marsh through introduction of sediment and armoring.
6) River reintroductions including one at or near the site of the current Violet Canal.
7) Long distance transport of sediment via pipeline for purposes of land restoration throughout the project area.
8) Improve existing levees, armor them (MRGO levee including banks), increase height where needed and protect them with restored marsh (marsh aprons).
9) Storm breakwaters constructed from the Golden Triangle to Bayou St. Malo.
10) Shoreline protection from the Golden Triangle to Bayou St. Malo.
11) A levee constructed from approximately Verret to the GIWW including protecting the land of the Golden Triangle.
12) Assured maintenance of MRGO by the Federal Government to new authorized draft.
13) No gate constructed across the MRGO/GIWW at Paris Road.
14) Fully fund a deep-draft lock at the IHNC and fast track this project to provide access for navigation to businesses currently relying on the MRGO.
15) Find relocation funding for existing businesses that currently rely on the MRGO.
16) Subsidize businesses until fixes are in place.

USACE comments on the above measures:
The following stakeholder consensus items are being considered for incorporation into the LACPR: 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, and 14.

3) The "something" is now a total closure structure near Bayou La Loutre under the Recommended Plan.
12) Under the Recommended Plan, this is probably not necessary.
13) Locations are being considered under the Inner Harbor Navigation Canal work authorized in Public Law 109-234 for storm protection.

4.5 FINAL INTEGRATED ECOSYSTEM RESTORATION AND HURRICANE PROTECTION: LOUISIANA'S COMPREHENSIVE MASTER PLAN FOR A SUSTAINABLE COAST, 2007

"• Immediately construct a closure dam at Bayou La Loutre that will restore the integrity of the Bayou La Loutre ridge. This will affect both the shallow-draft and deep-draft navigation industries, and a comprehensive closure plan should include mechanisms to mitigate the economic consequences for users that rely on the channel. However, these considerations should not in any way delay the channel's immediate closure. In addition, actions must be taken to avoid increased erosion in nearby waterways should shallow-draft and recreational traffic circumvent the closure structure.

• Ensure that the channel remains isolated from Lake Borgne so that the channel may convey fresh water from the Mississippi River to the Biloxi Marshes and other areas of St. Bernard Parish. Without such a freshwater conduit, these marshes will not receive wetland building fresh water and sediment.

• Restore wetlands and swamps in the Central Wetlands and Golden Triangle areas.

• Integrate this MRGO closure plan with overall hurricane protection plans for the New Orleans metropolitan area."

In Appendix A of the report, the following statement is found:
"This measure will close the MRGO at the Bayou La Loutre Ridge with an earthen plug. The MRGO begins at the confluence of the Gulf Intracoastal Waterway (GIWW) and the Inner Harbor Navigation Canal (IHNC) and extends southeastward through the Breton/Chandeleur Sound to the Gulf of Mexico. Appropriate economic mitigation plans must be implemented to address impacts to deep-draft and shallow-draft navigation facilities and industries. In addition, actions must be taken to avoid increased erosion in nearby waterways should shallow-draft and recreational traffic circumvent the closure structure. If at any time after the channel is closed with an earthen plug it is decided to restore limited navigation capacity, any new navigation structure to be constructed would be closed under normal conditions in order to maintain the integrity of the Bayou la Loutre Ridge. The lock structure would be operated only under emergency situations and only for shallow-draft traffic."

USACE comments on the above measures:

1) The Recommended Plan is a rock total closure structure near Bayou La Loutre.
2) Some stabilization of the MRGO and Lake Borgne shoreline is proposed as part of operation and maintenance activities authorized under Public Law 109-234 as is marsh creation on the landbridge between the MRGO and Lake Borgne.
3) Marsh creation in the Golden Triangle is proposed as part of operation and maintenance activities authorized under Public Law 109-234. Wetland restoration in the Central Wetlands is being considered under LACPR.
4) This is being considered under LACPR.

4.6 "MISTER GO MUST GO" PLAN

This report, authored by Drs. John Day and Paul Kemp of LSU, Dr. Mark Ford of CRCL, and Dr. John Lopez of the LPBF was presented to the USACE in December 2006 as a guide for the Congressionally directed closure of the MRGO. The report says that construction of MRGO destroyed and continues to destroy the natural hurricane buffer provided by wetlands and cypress forests. The report claims that MRGO exacerbated Hurricane Katrina's damage by increasing the height and speed of the storm surge and facilitated wave attack on exposed levees. The report proposes the following plan for de-authorization of MRGO:

1) De-authorize MRGO as a Federal navigation channel and cease maintenance dredging.
2) Restoration of the Ridge at Bayou La Loutre
3) Channel severance or constriction at other locations (four or preferably more additional locations). The constrictions must be planted with dense native wetlands vegetation to root them in place.
4) Restoration/Maintenance of the narrow land between Lake Borgne and the MRGO.
5) Restoration/Rehabilitation of bank lines along the MRGO. Place dredged material to a height of 3-5 feet to reclaim as much of the original 1965 bank lines as reasonable, especially on the south bank. Plant native coastal vegetation on the reclaimed banks and lateral fills.
6) Allow natural infill of the channel (especially the Sound Reach).
7) Expand riverine influence (Reintroduction of freshwater from Mississippi River)

USACE comments on the above measures:

1) This is part of the Recommended Plan.
2) This is being considered under LACPR.
3) The USACE proposes that only one structure on the MRGO near Bayou La Loutre is needed (see discussion of evaluation and elimination of Interim Report Alternative 2b in Sections 2.2 and 2.4 of this report).
4) Stabilization on some of the shore of Lake Borgne and marsh creation on the land bridge between the MRGO and Lake Borgne is proposed as part of operation and maintenance activities authorized under Public Law 109-234.
5) This is infeasible from an engineering viewpoint because it would involve 45-foot or longer sheet piles to keep the fill out of the reduced channel. It is also prohibitively expensive.
6) This would happen under the Recommended Plan
7) This is being considered under LACPR.

The report also suggests additional actions to facilitate coastal conservation and restoration, and to improve storm and flood protection as follows:

1) Levee Improvement (Existing levees along the MRGO must be improved to withstand storm surge from a 500 year flood and be constructed such that overtopping does not result in levee collapse and failure)
2) Restore Historic Habitats in the Region (as in the LPBF's Comprehensive Management Plan

3) Facilitate the usage of treated effluent from wastewater plants.
4) Restore Marsh Landbridges of the Biloxi Marsh.
5) Restore Barrier Islands.

USACE Comments on the above measures: All of these are being considered under LACPR.

4.7 LETTER FROM NATIONAL AND LOCAL ENVIRONMENTAL GROUPS, DATED JANUARY 26, 2006

This letter was signed by representatives of Environmental Defense, National Audubon Society, National Wildlife Federation, Louisiana Wildlife Federation, American Rivers, Coalition to Restore Coastal Louisiana, Gulf Restoration Network, the Lake Pontchartrain Basin Foundation and Levees.org. The letter pointed out the following items that were included in the "Preliminary Comprehensive Plan for De-authorizing the MRGO" report and they called them "Items of Agreement":

1) "Closure of the MRGO channel to both shallow and deep-draft navigation by an armored earthen structure just south of Bayou La Loutre near Hopedale, Louisiana";
2) Freshwater diversion into the MRGO and surrounding marshes (possibly in the vicinity of the Violet Canal);
3) Shoreline protection to prevent wetlands erosion (including maintenance of existing projects);
4) Habitat creation through the placement of sediment for rebuilding marshes, barrier islands, and ridges;
5) Increasing existing levee heights to new hurricane protection levels;
6) New hurricane protection levee alignments or surge protection structures.

USACE Comments on the above measures:

1) This is the Recommended Plan.
2) This is being considered under LACPR.
3) Shoreline protection on the MRGO and Lake Borgne are proposed as part of operation and maintenance activities authorized under Public Law 109-234. Maintenance of existing rock is being considered under LACPR.
4) This is being considered under LACPR.
5) This is being considered under LACPR.
6) This is being considered under LACPR.

The letter also stated that the following items are also essential for protecting New Orleans and St. Bernard Parish from future storms and should be included in the final plan for the MRGO:

1) The levees in St. Bernard Parish need to be not only higher, but better protected. Significant protection can be gained by rebuilding the banks of the MRGO, beginning with the banks in front of the St. Bernard levee, and planting new land

with dense native vegetation. Levees should also be armored with hard structure and be designed to be overtopped.

2) The closure of the MRGO by itself would not restore the fresh wetland (swamp) habitats destroyed by the MRGO, which would buffer storm surge. In addition to the proposed diversion at Violet, the plan should include the significant opportunity to beneficially use treated wastewater from the New Orleans Sewage plant to rebuild wetlands near the MRGO.
3) The plan calls for only one closure at Bayou La Loutre which would primarily address saltwater intrusion. Additional constrictions or closures are needed along the channel to reduce the induced effects on surge by the channel and to break wave fetch and reduce water velocity.

USACE Comments on the above measures:

1) This is infeasible from an engineering viewpoint because it would involve 45-foot or longer sheet piles to keep the fill out of the reduced channel. It is also prohibitively expensive. Work on the levees is being considered under LACPR.
2) This is being considered under LACPR.
3) The USACE proposes that only one structure on the MRGO near Bayou La Loutre is needed (see discussion of evaluation and elimination of Interim Report Alternative 2b in Sections 2.2 and 2.4 of this report).

The letter concludes with the following statement: "With congressional appropriation, the first phase of closure must be completed in 2008 and include at least a closure at Bayou La Loutre and rebuilding of the MRGO's south bank in front of the St. Bernard levee."

USACE response:

The USACE is moving as fast as possible to complete a plan to de-authorize the MRGO channel from the GIWW to the Gulf of Mexico to both deep- and shallow-draft navigation and to place a total closure structure near Bayou La Loutre. As described above, partially filling the MRGO in front of the St. Bernard levee is infeasible.

4.8 MRGO WEB PAGE

Additional measures to incorporate public input include an internet web page. The web page (http://mrgo.usace.army.mil/) offers interactive capability allowing visitors to submit information and opinions via email. The page also includes a digital library of publications related to the history of the channel, maps depicting the area, a calendar of events, minutes of stakeholder meetings, a transcript of the October 28, 2006 public meeting, the Interim Report to Congress and the Draft Final Report to Congress/Draft LEIS. In addition, notes from the May 19, 2007 public information meeting, along with the presentation slides, have been added. The information is intended to serve as a resource for the study team and interested stakeholders.

4.9 PUBLIC MEETINGS

A public meeting was held on October 28, 2006 at the University of New Orleans and involved an open house where stakeholder groups were offered display space to present their points of view. More than 150 people attended the public meeting, which included

a formal presentation of the study process and scope from the USACE and an open comment period for public statements from citizens, organizations, and elected officials. Public comments made in this meeting were influential in plan formulation for the Interim Report to Congress.

A public information meeting was held on May 19, 2007 at Nunez Community College in Chalmette, Louisiana. The meeting offered attendees an opportunity to view a series of posters presented by the USACE on the study. In addition, various stakeholders displayed information and interacted with the meeting attendees. More than 100 attendees listened to a formal presentation regarding the alternatives evaluated in detail and the Recommended Plan. Following the presentation, attendees had the opportunity to ask questions. All attendees were made aware of the study schedule and process.

4.10 AREAS OF CONCERN AND CONTROVERSY

Construction of the MRGO Project resulted in the conversion of marsh, wetland forest and shallow open water habitat (USACE 1999). Erosion causes additional acres to be lost each year along the MRGO channel (USACE 2004). Citizens are concerned about coastal erosion, populations of wildlife and fisheries, and increased salinity in area water bodies. Many members of the public also feel that the loss of wetlands exacerbated the flooding of St. Bernard Parish during Hurricane Katrina.

Many citizens of Orleans and St. Bernard Parishes firmly believe that the Inland Reach of the MRGO serves as a storm surge pathway during hurricanes. A number of reports concluded that the Inland Reach of the MRGO contributes very little to flooding when the surrounding marshes are inundated. Reports also indicate that to prevent storm sure in Lake Borgne from reaching the IHNC or GIWW Reach of the MRGO, flow through the GIWW Reach of the channel must be dramatically reduced or eliminated. The USACE is actively planning, designing and building numerous upgrades and new system components to increase the level of hurricane protection for the entire area. The connectivity between Lake Borgne and the GIWW Reach of the MRGO and IHNC is being addressed through efforts to provide comprehensive hurricane and storm protection through the Lake Pontchartrain and Vicinity Hurricane Protection project 100-year protection effort. See Section 1.8 and Appendix D for further discussions on the MRGO and storm surge.

Stakeholders in the navigation industry have expressed concerns that when the MRGO is de-authorized from the GIWW to the Gulf of Mexico, shallow-draft vessels would no longer be able to use the channel as an alternate route when the Inner Harbor Navigation Canal Lock is congested or inoperable. Industry members believe this could present a serious problem for fuel transport and movement of other vital commodities. In evaluating this concern the USACE determined that this potential event would be very rare. Based upon the economics evaluation of this study, expenditures to construct and maintain a shallow-draft feature for MRGO traffic is not justified. As such, the USACE, navigation industry representatives, and leaders from St. Bernard Parish are willing to work together to identify suitable alternative routes to alleviate this potential issue.

The following options have been identified as potential alternative routes around the IHNC-GIWW-MRGO system (see Figure 4.1):

1. Mississippi River to Baptiste Collette Bayou and into Breton Sound and Chandeleur Sound and up to Mississippi Sound to rejoin the GIWW. A drawback of this option is the potential lack of adequate draft in the reach between the mouth of Baptiste Collette Bayou and Mississippi Sound. In addition, navigation safety concerns could be a factor because of the long expanse of open water that would be traversed on this route.

2. Mississippi River north to the Ohio and Tennessee Rivers to eventually join the Tennessee-Tombigbee Waterway and south into Mobile Bay to rejoin the GIWW. A drawback of this option is the much greater time and distance required.

3. Mississippi River to Baptiste Collette Bayou and into Breton Sound and north up to the back retainer canal on the south side of the MRGO spoil area and up to Bayou La Loutre at Hopedale to enter the MRGO and travel up to rejoin the GIWW in the vicinity of Michoud. A drawback of this option is the potential lack of adequate draft in the reach between the mouth of Baptiste Collette Bayou and the back retainer canal and the segment up the retainer canal to Hopedale.

4. Mississippi River to Baptiste Collette Bayou and into Breton Sound and north up to the mouth of Bayou La Loutre in Bay Eloi and then through Bayou La Loutre to enter the MRGO and travel up to rejoin the GIWW in the vicinity of Michoud. A drawback of this option is the potential lack of adequate draft in the reach between the mouth of Baptiste Collette Bayou and Bayou La Loutre.

5. Emergency removal of a portion of the rock total closure structure in the event of prolonged delays or inoperability of the IHNC Lock if authorization and funding are available. A cost estimate for this option has been developed and included in Appendix C. A drawback of this option is the potential lack of adequate draft in the reach between the mouth of Baptiste Collette Bayou and the Sound Reach of the MRGO. Additional work would be needed to define implementation criteria and to identify responsible parties because under the Recommended Plan the Federal government would no longer own or maintain any MRGO features from the GIWW to the Gulf of Mexico.

The USACE will continue to develop these and other options in coordination with stakeholder groups. One possibility would be to consider efforts to improve the condition of the IHNC Lock through maintenance actions, which may improve the efficiency and reliability of the IHNC Lock and reduce the desire for an alternative route.

Stakeholders in the shallow draft navigation industry have expressed concern that prolonged closure of the Inner Harbor Navigation Canal (IHNC) Lock with no alternate route available will cause significant income and employment impacts to businesses that rely on shipments traversing the IHNC Lock and that these impacts were ignored in

economic evaluations. However, as specified in USACE guidelines, the effects on income levels and employment levels generally fall into the Regional Economic Development (RED) account. These effects are considered to be RED in nature because, 1) increases or decreases in income/employment levels in one region will tend to be offset by increases or decreases in income/employment levels in another region resulting in a minimal net effect to the nation, and, 2) losses in one region that are not captured by another region can often be made up at a later date in the initially impacted region. This is not to say that the income/employment impacts can not be National Economic Development (NED) in nature, or that the impacts are insignificant at a regional level, but that from a national perspective the net impacts are likely to be small. Given that this is the case and that NED impacts take priority over RED impacts, the economic evaluation performed for the MRGO De-Authorization Study chose not to quantify income/employment implications.

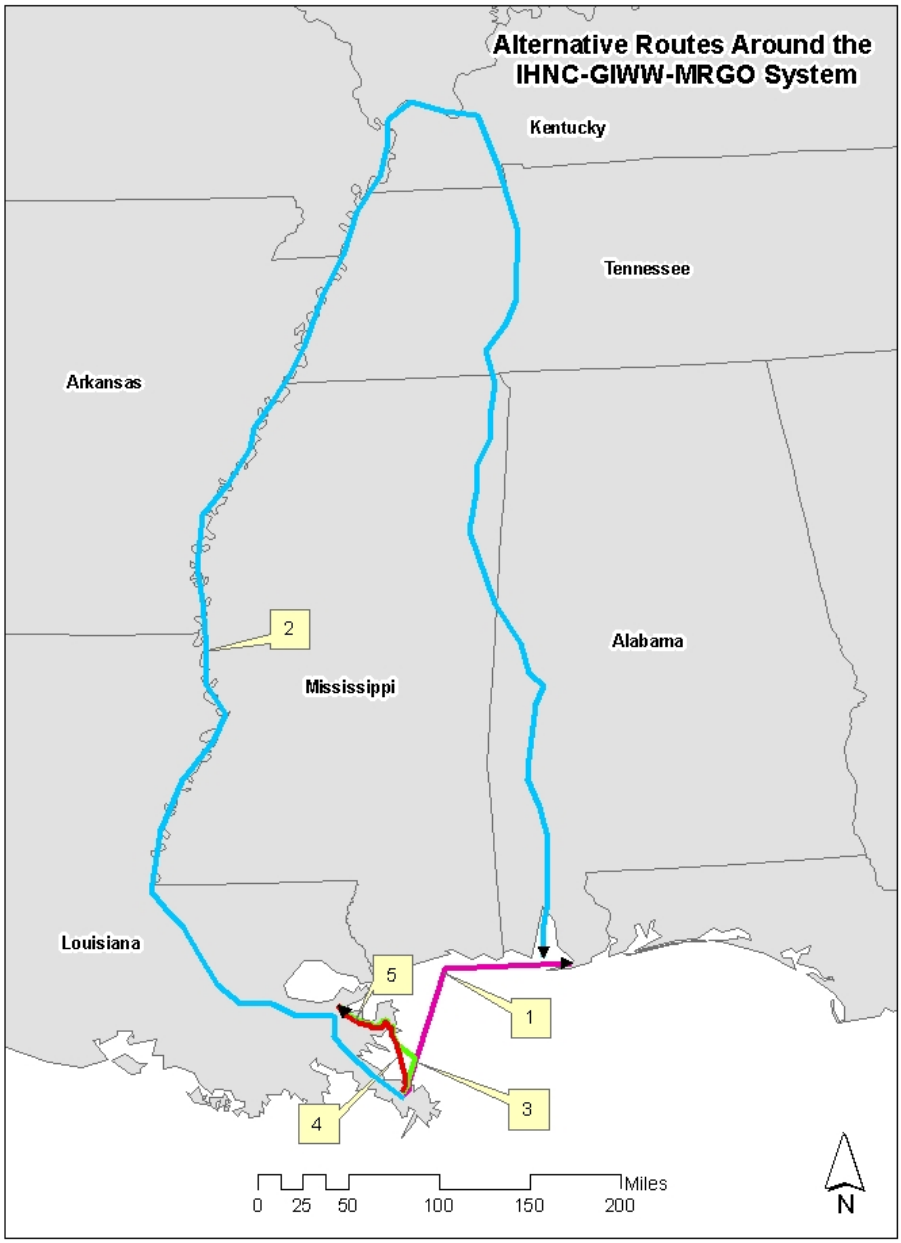
Some groups are concerned that the replacement of the IHNC Lock is somehow directly connected to the de-authorization of MRGO to deep-draft navigation. Although these projects are related, the Recommended Plan is in no way dependent on the replacement of the lock or vice versa.

Some vessels may choose to utilize Bayou La Loutre, a Federally authorized channel, to access Chandeleur Sound and numerous waterways in the Biloxi Marshes following installation of a total closure structure on the MRGO channel. Bayou La Loutre has a controlling depth of six feet limiting vessels to recreational and commercial fishing boats, small tugs and barges, and oil field service boats. Although, the potential number of vessels that would use Bayou La Loutre and the potential impacts of diverted vessel traffic along the waterway cannot be quantified at this time, the overall environmental benefits of the Recommended Plan will far outweigh any potential impacts to Bayou La Loutre. Vessel traffic and shoreline erosion rates are monitored along Bayou La Loutre and other Louisiana waterways under private, state, and Federal efforts to implement coastal restoration plans.

4.11 RESOLUTION OF COMMENTS ON DRAFT LEIS

All comments received during the 45-day public comment period on the draft LEIS are documented and responded to in Appendix P. All commenters will be sent a Notice of Availability of this Integrated Final Report to Congress and LEIS.

Figure 4.1 – Alternative Routes Around the IHNC-GIWW-MRGO System



SECTION 5 COORDINATION AND COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS

5.1 U.S. FISH AND WILDLIFE SERVICE RECOMMENDATIONS

The U.S. Fish and Wildlife Service (USFWS) provided a Coordination Act Report (see Appendix F) in April 2007 with the following recommendations:

1) The USFWS and NMFS should be provided an opportunity to review and submit recommendations on the draft plans and specifications on the MRGO total closure structure addressed in this report.
2) Coordination should continue with the USFWS and National Marine Fisheries Service on detailed contract specifications to avoid and minimize potential impacts to manatees and Gulf sturgeon.
3) Once the MRGO is de-authorized, Breton Island NWR would no longer benefit from placement of dredged material on or adjacent to the island. Many of Louisiana's barrier islands are used for nesting by brown pelicans and as wintering areas by the piping plover. As barrier islands decline, so declines those and other species' habitats. The Service recommends the Corps either retain authority to dredge between MRGO mile 3.4 to mile -2.0 (see note below) for restoration purposes only, to continue placement on or adjacent to Breton Island NWR to benefit brown pelicans, piping plovers, and other shore birds or to seek additional funding through other environmental restoration purposes as part of the project Federal Standard. Note: Shoal material removed from the MRGO Mile 3.4 to Mile -2.0 Breton Sound and Bar Channel dredging reaches is placed at Breton Island for barrier island restoration purposes as part of the project Federal Standard.
4) If the proposed project has not been constructed within 1 year or if changes are made to the proposed project, the USACE should re-initiate Endangered Species Act consultation with the USFWS.
5) The area in and around the total closure structure and key locations from the total closure structure and north as far as Lake Maurepas, if possible, should be monitored to sufficiently determine the hydrologic effects of the closure and to document the changes in circulation patterns, salinity changes, and changes to the hypoxic-anoxic (H-A) zone, which is about 100 square miles in Lake Pontchartrain with the Industrial Canal as the focal point. The Service and NMFS should be involved in the development of a monitoring plan and in review of the data.
    a. It should be noted that the USACE concurred with our fourth recommendation requesting monitoring of the project. However, the USACE states that concurrence would be accomplished through existing monitoring programs rather than through project specific monitoring. The Service would like to further recommend the USACE to reconsider including monitoring as part of this project even if for a short time and limited area in and around the closure structure. As an alternative, the USACE could supplement an existing agencies monitoring program. For example, Louisiana Department of Environmental Quality's quarterly

samples (e.g., Bayou Dupre, IHNC, Causeway, and Rigolets) could be sampled every two months for two years following the total structure closure. The gathered data would be extremely useful for addressing assumptions about the system response to the closure structure and identifying any potential adverse impacts.

6) The Corps should investigate and seek legislative approval (e.g., project specific, Continuing Authority Program Section 206, etc.) to maintain the existing 9.9 miles of bank stabilization features and jetties that provide erosion protection benefits.
    a. It should be noted that the USACE concurred with this fifth recommendation. However, the USACE states concurrence may be accomplished through investigations under other authorities. The Service encourages the USACE to reconsider modifying the TSP to include maintenance for the shoreline protection features for at least 1 more maintenance cycle, especially on the north bank of the MRGO at the MRGO/Lake Borgne interface. Even though the total closure structure will greatly reduce vessel traffic erosion, wind, and small boat wave erosion are still expected to occur from both the MRGO and Lake Borgne. The shoreline protection features are beneficial to protecting the critical wetlands between the MRGO and Lake Borgne. Protecting those wetlands is not only beneficial to fish and wildlife resources of the area but the 4th supplemental Congressional mandate for the MRGO bank stabilization project are to repair, construct, or provide measures or structures necessary to protect, restore, or increase wetlands, to prevent saltwater intrusion or storm surge in the MRGO area. Id shoreline protection features are not maintained at least until other authorities can assume the responsibility, sustainability of those critical wetlands and the protection they provide to the Greater New Orleans area would be at risk. If the stabilization features will not be maintained, then indicators to aid navigation should be installed.

The USACE would concur with these recommendations were the project to be approved by Congress. In considering Recommendation 3, the USACE would not be able to retain authority to dredge between MRGO mile 3.4 and mile -2 for restoration purposes. However, such dredging and disposal could be pursued under another restoration authority, perhaps CWPPRA. Concurrence with Recommendation 5 could be achieved via the CWPPRA CRMS monitoring program as well as existing water quality sampling programs of various agencies. The shoreline protection features mentioned in Recommendation 6 are slated to remain in place. It is estimated that they should stay above the water for 10 years. During that time, another authority to maintain them can be sought.

Other environmental commitments include:

- Removal of aids to navigation and channel markers at the discretion of the United States Coast Guard.

- An effort would be made to construct the total closure structure during the April 1 through October 31 window recommended by the USFWS. Existing detailed contract specifications which protect sea turtles, manatees and Gulf sturgeon would continue, as would coordination with USFWS and NMFS..

- Full integration of the MRGO Deep-Draft De-authorization Recommended Plan into the LACPR Final Report to Congress.

5.2 COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

This section documents compliance with statutory authorities, including environmental laws, regulations, Executive Orders, policies, rules and guidelines. Relevant statutory authorities are listed in Table 5.1

5.2.1 EO 11988, Floodplain Management

The Recommended Plan would be located within the 100-year floodplain because there are no non-floodplain alternatives. The Recommended Plan could reduce harm to people or property in the floodplain because it could provide protection in small surge events where the surrounding marsh areas are not completely inundated.

5.2.2 EO 11990, Protection of Wetlands

Of the alternatives considered, the Recommended Plan would provide the most extensive protection of wetlands.

5.2.3 EO 12898, Environmental Justice (EJ)

On February 11, 1994, President Clinton issued EO 12898 directing Federal agencies "To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States…" Additionally, the U.S. Environmental Protection Agency defines EJ as the "fair treatment for people of all races, cultures, and incomes, regarding the development of environmental laws, regulations, and policies." While recognizing EJ as a potentially significant issue, the location and impacts of the proposed legislative action are not expected to expose any segment of the public disproportionately to any adverse environmental effects as outlined by EO 12898. Furthermore, the general public has been provided multiple opportunities to be made knowledgeable of and participate in public meetings on the proposed legislative action. However, a concurrent study is being conducted to verify whether or not further action under the purview of EJ is warranted.

5.2.4 Endangered Species Act of 1973

The USACE has determined, based on letters that are contained in Appendix J, that the Recommended Plan would not adversely affect any endangered or threatened species or their critical habitat. Concurrence with the USFWS and NMFS will be accomplished

through their review of the letters, included in Appendix F. The NMFS letter requests that the USACE comply with the Sea Turtle and Smalltooth Sawfish Construction Conditions below.

a. "The Contractor shall instruct all personnel associated with the project of the potential presence of these species in the area, and the need to avoid collisions with these sea turtles and smalltooth sawfish. All construction personnel are responsible for observing water-related activities for the presence of these species.

b. All construction personnel shall be advised that there are civil and criminal penalties for harming, harassing, or killing sea turtles or smalltooth sawfish which are protected under the Marine Mammal Protection Act of 1972 and the Endangered Species Act of 1973.

c. If siltation barriers are used, they will be made of material in which a sea turtle or smalltooth sawfish cannot become entangled, be properly secured, and be regularly monitored to avoid protected species entrapment. Barriers may not block sea turtle or smalltooth sawfish entry to or exit from designated critical habitat without prior agreement National Marine Fisheries Service's Protected Resources Division, St. Petersburg, Florida.

d. All vessels associated with the project shall operate at "no wake/idle" speeds at all times while in waters where the draft of the vessel provides less than a four-foot clearance from the bottom. All vessels will follow deep water routes (e.g. marked channel) whenever possible.

e. If a sea turtle or smalltooth sawfish is sighted within 100 yards of the active daily construction/dredging operation or vessel movement, all appropriate precautions shall be implemented to ensure its protection. These precautions shall include the cessation of operation of all moving equipment closer than 50 feet of a sea turtle or smalltooth sawfish. Operation of any mechanical construction equipment shall cease immediately if a sea turtle or smalltooth sawfish is seen within a 50-foot radius of the equipment. Activities may not resume until the protected species has departed project area of its own volition.

f. Any collision with and/or injury to a sea turtle or smalltooth sawfish shall be reported immediately to the National Marine Fisheries Service's Protected Resources Division (727-824-5312) and the local authorized sea turtle stranding/rescue organization.

g. Any special construction conditions required of your specific project, outside these general conditions, if applicable, will be addressed in the primary consultation."

The above conditions will be added to the other endangered species conditions in any contracts for the project. Nearly all of the restrictions above are already in the USACE letter applying to the West Indian manatee. It should be noted that the smalltooth sawfish has been extirpated from the project area and there is no critical habitat in Louisiana or this species.

5.2.5 Clean Water Act Section 404(b)(1) Evaluation

A Section 404(b)(1) Evaluation has been prepared for the Recommended Plan for MRGO Deep-draft De-authorization and is contained in Appendix I. The USACE has determined that the sites and methods for dredged or fill material disposal comply with Section 404(b)(1) Guidelines for water quality.

The Recommended Plan meets the Clean Water Act Section 404(r) criteria for an exemption from the requirement to obtain a State water quality certificate. (Criteria 1 - information on the effects of the discharge of fill material into waters of the United States, including the application of the Section 404(b)(1) Guidelines, is included in the Integrated Final Report and LEIS. Criteria 2 - the Integrated Final Report and LEIS will be submitted to Congress before the actual discharge takes place and prior to authorization of the Recommended Plan.) However, the Section 404(r) exemption was not invoked and a State water quality certificate has been obtained.

5.2.6 Clean Water Act Section 401 State Water Quality Certification

Clean Water Act Section 401 State Water Quality Certification was accomplished by issuance of state water quality certificate DH 070806-01 on October 9, 2007, which is found in Appendix N.

5.2.7 Coastal Zone Management Act.

A Coastal Zone Management Program Consistency Determination has been prepared and is found in Appendix K. The USACE has determined, based on the Coastal Use Guidelines, that the Recommended Plan is consistent to the maximum extent practicable, with the State of Louisiana's approved Coastal Management Program.

In a letter dated October 15, 2007, the Louisiana Department of Natural Resources made the following determination: "...to the extent that the proposed activity will be carried out and the impacts and results are all as described in the Draft Plan, the Tentatively Selected Plan meets the minimum qualifications for consistency with the State's federally approved Coastal Zone Management Program."

5.2.8 Hazardous, Toxic, and Radioactive Waste

The USACE is obligated under Engineering Regulation 1165-2-132 to assume responsibility for the reasonable identification and evaluation of all Hazardous, Toxic, and Radioactive Waste (HTRW) contamination within the vicinity of the Recommended Plan project area. HTRW Land Use History and HTRW Initial Site Assessments (ISA) have been completed in the project area and are on file with the USACE. Based on the existing ISAs, the probability of encountering HTRW in the project area is low. Continued implementation of the Recommended Plan would be warranted, based on these findings.

Addressing future HTRW concerns would require a review of site-specific, as well as project specific, information and plans. As strategies become more defined, a more detailed HTRW analysis would be performed to further evaluate and avoid potential HTRW problems. This detailed analysis would be accomplished by conducting

additional, site-specific HTRW site assessments. Should an HTRW concern be discovered during the investigation or after initiation of project and the development of a response action be required, the USACE would coordinate with the appropriate Federal and state authorities to develop an approved response action.

All plans will be investigated for potential HTRW. The general direct, indirect, and cumulative impacts will be dependent on site specific HTRW discovery. Based on existing HTRW studies in the project action area, there is reason to believe that the potential to encounter HTRW problems will be low, and therefore without cumulative impact.

For the project area, the following are HTRW investigations on file with the USACE:

- 078 Creef 31 Jul 95 Preliminary HTRW Screening, FY 95 Maintenance Dredging, Mississippi River-Gulf Outlet, Louisiana
- Michoud Canal and Inland MR-GO, MRGO 60.4 - 49; Michoud 0.1 - 1.7
- 117 Brown 22 May 97 MR-GO Wetland Creation
- 124 Brown 22 Sept. 97 Upper MR-GO Wetland Creation
- 136 Brown 10 July 98 MR-GO Hopedale Marshes Disposal Area, Mile 38
- 157 Creef/Brown MRGO Mile 43-41 Bank Stabilization
- 229 C. Rowe 25 May 04 Lake Borgne and MRGO Shoreline Protection Project
- 235 C. Rowe 20 June 04 MRGO ACM, Hopedale, La
- 251 A. Bennett 31 Oct 2005 HTRW checklist, MR-GO Foreshore Protection Project, Miles 60-47, St. Bernard Parish, LA
- 282 MMG, Inc. 20 Oct 06 GIWW and MRGO Option 1 Corridor (HPO)
- 283 MMG, Inc. 20 Oct 06 GIWW and MRGO Option 2 Corridor (HPO)

5.2.9 National Historic Preservation Act

The State Historic Preservation Officer was contacted and has determined by a statement dated September 6, 2007 that no known archaeological sites or historic properties will be affected by this undertaking. See Appendix M.

Section 106 consultation for the proposed de-authorization of the Mississippi River Gulf Outlet was carried out with the tribes which have historically shown an interest in MVN projects in the area of the proposed action. The Alabama-Coushatta Tribe of Texas, the Choctaw Nation of Oklahoma, the Coushatta Tribe of Louisiana, the Jena Band of the Choctaw Indians, the Seminole Tribe of Florida, and the Tunica-Biloxi Tribe of Louisiana were contacted by e-mail. The Chitimacha Tribe of Louisiana and the Mississippi Band of Choctaw Indians were contacted by phone. The tribes contacted by e-mailed either did not respond or agreed to allow the Chitimacha to act as the lead for Native American consultation. The Mississippi Band of Choctaw Indians also agreed to let the Chitimacha act as the lead tribe for consultation. The USACE coordinated with the Chitimacha Tribe throughout the planning process for this project. See Appendix M.

5.3 ISSUES TO BE RESOLVED UNDER RECOMMENDED PLAN

Implementing the Recommended Plan would result in the abandonment of channel features constructed for purposes of shoreline protection, levee protection, and channel protection. These features include jetties in the offshore segments of the channel in Breton and Chandeleur Sounds, and foreshore protection segments along the portion of the Chalmette Loop Levee fronting the MRGO, and foreshore protection in various locations on the north bank of the channel fronting wetlands areas. Due to geologic conditions and the elimination of maintenance authority, these features are predicted to subside below the water line resulting in diminished functional performance against wave energies.

5.4 ENVIRONMENTAL CONSIDERATIONS UNDER THE RECOMMENDED PLAN

5.4.1 Environmental Impacts of the Recommended Plan

The Recommended Plan is estimated to prevent the potential loss of a significant percent of the 2,343 net acres of marsh estimated to be lost under the future without de-authorization. It could change salinity toward historic conditions. There are likely to be no large-scale changes in marsh habitat type, but there could be local changes toward historic conditions. More intermediate marsh and swamp are expected to return to areas within the Central Wetlands. There could be more brackish marsh within the Lake Borgne/MRGO land bridge. Estuarine dependent fisheries and wildlife associated with wetlands should increase compared to the future without scenario, as should fishing and hunting opportunities.

Salinity stratification would be reduced north of the total closure structure, which is anticipated to reduce salinity stratification in Lake Pontchartrain. This is expected to shrink the "H-A zone," which could allow large Rangia clams and other benthos to populate the center of the lake. Turbidity could be reduced and submerged aquatic vegetation (SAV) would probably increase. These factors could significantly improve the aquatic ecosystem in portions of Lake Pontchartrain.

5.4.2 Compliance with Environmental Regulations

The Recommended Plan is in full compliance with the Fish and Wildlife Coordination Act, the Endangered Species Act, the Clean Water Act, the Coastal Zone Management Act, EO 11988, EO 11990, EO 12898 and other environmental laws and regulations listed in Section 5. The Recommended Plan is not likely to adversely impact any endangered or threatened species. It complies with the requirements of the Section 404(b)(1) Guidelines for water quality. It is consistent to the maximum extent practicable with the State of Louisiana's approved Coastal Zone Management Program.

Table 5.1 Relevant Federal Statutory Authorities and Executive Orders

Relevant Federal Statutory Authorities and Executive Orders (Note: this list is not complete or exhaustive.)	
Abandoned Shipwreck Act of 1987	Land & Water Conservation Fund Act of 1965
American Indian Religious Freedom Act	Magnuson-Stevens Fishery Conservation and Management Act of 1996
Antiquities Act of 1906	Magnuson-Stevens Act Reauthorization of 2006
Archeological Resources Protection Act of 1979	Marine Mammal Protection Act of 1972
Archeological and Historical Preservation Act	Marine Protection, Research, and Sanctuaries Act of 1972
Bald Eagle Protection Act of 1940,	Migratory Bird Conservation Act
Clean Air Act	Migratory Bird Treaty Act
Clean Water Act	Migratory Bird Habitat Protection (EO 13186)
Coastal Barrier Improvement Act of 1990	National Environmental Policy Act of 1969
Coastal Barrier Resources Act of 1982	National Historic Preservation Act of 1966
Coastal Wetlands Planning, Protection, and Restoration Act	Native American Graves Protection and Repatriation Act
Coastal Zone Management Act of 1972	Noise Control Act of 1972
Comprehensive Environmental Response, Compensation, and Liability Act	North American Wetlands Conservation Act
Consultation and Coordination with Indian Tribal Governments (EO 13175)	Pollution Prevention Act of 1990
Emergency Planning and Community Right-to-Know Act of 1986	Prime and Unique Farmlands, 1980 CEQ Memorandum
Emergency Wetlands Restoration Act of 1986	Protection and Enhancement of the Cultural Environment, 1971 (EO 11593)
Endangered Species Act of 1973	Protection and Enhancement of Environmental Quality (EO 11991)
Environmental Quality Improvement Act of 1970	Protection of Children from Environmental Health Risks and Safety Issues (EO 13045)
Estuary Protection Act	Federal Compliance with Pollution Control Standards (EO 12088)
Farmland Protection Policy Act	Protection of Cultural Property (EO 12555)
Federal Actions to Address Environmental Justice in Minority Populations & Low-Income Populations (EO 12898)	Protection of Wetlands (EO 11990)
Federal Facilities Compliance Act	Recreational Fisheries (EO 12962)
Federal Land Policy and Management Act of 1976	Resource Conservation and Recovery Act of 1976
Federal Water Pollution Control Act of 1972	Rivers and Harbors Act of 1899
Federal Water Project Recreation Act of 1965	River and Harbor and Flood Control Act of 1970
Fish and Wildlife Conservation Act of 1980	Safe Drinking Water Act
Fish and Wildlife Coordination Act	Submerged Land Act
Flood Control Act of 1944	Toxic Substances Control Act
Floodplain Management (EO 11988)	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Public Law 91-646)
Food Security Act of 1985	Water Resources Development Acts of 1976, 1986, 1990, and 1992
Greening of the Government Through Efficient Energy Management (EO 13123)	Water Resources Planning Act
Greening of the Government Through Leadership in Environmental Management (EO 12148)	Watershed Protection & Flood Prevention Act
Greening of Government Through Waste Prevention, Recycling, and Federal Acquisition (EO 13101)	Water Pollution Control Act Amendments of 1961
Historic Sites Act of 1935	Wild and Scenic River Act
Historical and Archeological Data-Preservation	Wilderness Act
Invasive Species (EO 13112)	

SECTION 6 RECOMMENDATION

As the District Engineer I have considered the environmental, social, and economic effects, the engineering and technical elements, and the comments received from other resource agencies and the public during this Mississippi River Gulf Outlet Deep Draft De-authorization study effort and plan formulation. Based upon the sum of this information, I am recommending the de-authorization of the MRGO Project from Mile 60 to Mile -9.4 as described in Section 6.1. The Recommended Plan minimized cost associated with the disposition of the de-authorized project while meeting the criteria of completeness, effectiveness, efficiency and acceptability.

I am recommending a De-authorization Plan that is comprised of a total closure structure at Bayou La Loutre and channel de-authorization from Mile 60 to Mile -9.4, with such modifications thereof as in the discretion of the Commander, HQUSACE, may be advisable.

Note: The project delivery team has developed detailed design and cost information for the recommended plan. Cost information presented for the Recommended Plan is based on advanced design and therefore differs from the costs presented for Alternative 1 which were based on preliminary design information. Advanced design has been generated through the analysis of field engineering data recently collected at the proposed closure structure location. Field data includes bathymetric surveys and subsurface geotechnical borings. Engineering analysis of the information was used to developed design and cost information to a feasibility level of detail. This level of information was developed only for the recommended plan not the entire array of alternatives. This section of the report provides the feasibility level design and cost information. The team has not updated information in earlier parts of the report because the added information does not change plan selection. This assessment is based upon the initial screening of navigation alternatives and subsequent assessment that remaining alternatives involving rock would change proportionally with the recommended plan.

6.1 DESCRIPTION OF THE RECOMMENDED PLAN

Under the Recommended Plan, that portion of the MRGO channel from mile 60 at the southern bank of the GIWW to the Gulf of Mexico would be de-authorized for all navigation use. The MRGO channel (mile 66 – 60), the Michoud Canal Project, and the IHNC Lock Replacement Project would remain authorized. As part of the Plan, a total closure structure would be built of rock downstream of the south ridge of Bayou La Loutre in St. Bernard Parish, Louisiana. The structure would connect the two sides of the ridge, a distance of approximately 950 feet. The top width of the structure would be 12 feet and the elevation would be + 7 feet NAVD 88. Following completion of construction, the elevation of the structure will not be less than +4 feet NAVD 88. The side slopes of the structure would be 1 V to 2 H and the bottom width would be 450 feet. Quarry run “A” stone would be used to increase fines in the mix and minimize voids and water exchange. The structure would cover nearly 10 acres of water bottoms. Overbank extensions would be necessary on either side of the structure to constrict flow during high water events and prevent flanking of the channel closure. These overbank tie-ins would

be approximately 50 feet wide and 7 feet high and extend inshore approximately 150 feet on the south bank and approximately 250 feet on the north bank. Construction of these overbank extensions will impact 0.5 acres of marsh on the north bank and 0.3 acres of scrub shrub on the south bank. Approximately 391,500 tons of stone would be used. A barge-mounted dragline would be used to place the rock. Construction would take approximately 210 days. Every effort would be made to construct the total closure structure during the May through September window when Gulf sturgeon are in the rivers and not the estuaries.

The Federal government would construct the total closure structure. Navigation aids and channel markers would be considered for removal at the discretion of the United States Coast Guard. Existing bank stabilization features and jetties would be de-authorized but remain in place. Maintenance of the existing bank stabilization features and possible reapplication or realignment of the jetties could be investigated under LACPR or other appropriate authorities. Disposal easements and perpetual channel easements not required for continued operation and maintenance of authorized segments of the MRGO Project would be released. Other property not required for continued operation and maintenance of authorized segments of the MRGO Project would be disposed of in accordance with the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. § 471 et seq. A non-Federal sponsor would be required to acquire any real estate necessary to implement the Recommended Plan and for operation, maintenance, repair, rehabilitation, and replacement (OMRR&R) of the total closure structure. In addition, the non-Federal Sponsor would be required to hold and save the Government free from all damages arising from the construction, operation, maintenance, repair and replacement of the total closure structure, except for damages due to the fault or negligence of the Government or its contractors.

The construction costs of the total closure structure would be 100% Federal (except real estate) and the OMRR&R costs of the total closure structure would be 100% non-Federal. The estimated total project construction cost of the rock total closure structure is $24,684,150 based on October 2006 price levels. Total average annual costs for the Recommended Plan (including OMRR&R costs and the costs to navigation) are estimated to be approximately $5.1 million and total average annual benefits are estimated to be $12.5 million (savings derived from not dredging the authorized channel). This results in an estimated total average annual net benefit of $7.4 million. Estimated total project construction costs, annual costs and benefits, and Federal/non-Federal cost breakdown are presented in Tables 6.1 through 6.4. Costs presented in these tables are based on advanced design of the Recommended Plan.

Additionally, the Recommended Plan contemplates that measures undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 in Title II, Chapter 3 of Public Law 109-234 will be implemented conditioned on the non-Federal sponsor for those measures assuming responsibility of OMRR&R of those measures at 100% non-Federal cost. Table 6.5 lists the features of the existing MRGO Project and explains the status of those features as contemplated under the Recommended Plan.

Table 6.1 Project First Costs

Project First Costs
MRGO Deep-Draft De-authorization Study
Closure Structure
(October 2006 Price Levels,
Based on Advanced Design of Recommended Plan)

Construction Items	Cost ($)
Mobilization and Demobilization	85,000
Stone Placement - Channel Proper	11,773,000
Stone Placement - Overbank Tie-Ins	403,650
Crushed Stone Blanket	3,400,000
Geotextile Separator Fabric	31,500
Clearing and Grubbing (Overbank)	11,000
Engineering and Design	863,700
Construction Management	1,256,300
Real Estate*	1,401,000
Removal of Aids to Navigation	700,000
Contingencies	4,759,000
Total Project Construction Costs	**24,684,150**

*****Of the total Real Estate costs, $21,000 are associated with acquisition of real estate rights necessary for the construction of the closure structure. For an explanation of additional costs, see Appendix E.

6.2 MRGO ECOSYSTEM RESTORATION PLAN

Consistent with Public Law 109-234, which authorized the development of a comprehensive plan to de-authorize the deep draft navigation on the MRGO from the GIWW to the Gulf of Mexico, the plan formulation contained in this report (see Section 2) focused on measures that were attributed directly to the de-authorization of the MRGO channel. At the time this report was being released for State and Agency review, Section 7013 of the WRDA 2007 became law and expanded the scope of the study and report authorized by Public Law 109-234. In addition, pursuant to section 7013, upon submission of the final report to the Committee on Environment and Public Works of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives, the MRGO from the Gulf of Mexico to Mile 60 at the southern bank of the Gulf Intracoastal Waterway is no longer authorized. Section 7013 also authorizes the Secretary of the Army to carry out a plan to close the MRGO and to restore and protect the ecosystem substantially in accordance with the final report subject to the Secretary's determination that the plan is cost-effective, environmentally acceptable, and technically feasible. The full text of Section 7013 is provided below:

SEC. 7013. MISSISSIPPI RIVER-GULF OUTLET.

(a) DEAUTHORIZATION.—
(1) IN GENERAL.—Effective beginning on the date of submission of the plan required under paragraph (3), the navigation channel portion of the Mississippi River-Gulf Outlet element of the project for navigation, Mississippi River, Baton Rouge to the Gulf of Mexico, authorized by the Act entitled ''An Act to authorize construction of the Mississippi River-Gulf outlet'', approved

March 29, 1956 (70 Stat. 65) and modified by section 844 of the Water Resources Development Act of 1986 (100 Stat. 4177) and section 326 of the Water Resources Development Act of 1996 (110 Stat. 3717), which extends from the Gulf of Mexico to Mile 60 at the southern bank of the Gulf Intracoastal Waterway, is not authorized.
(2) SCOPE.—Nothing in this paragraph modifies or deauthorizes the Inner Harbor navigation canal replacement project authorized by that Act of March 29, 1956.
(3) CLOSURE AND RESTORATION PLAN.—
(A) IN GENERAL.—Not later than 180 days after the date of enactment of this Act, the Secretary shall submit to the Committee on Environment and Public Works of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives a final report on the deauthorization of the Mississippi River-Gulf outlet, as described under the heading ''INVESTIGATIONS'' under chapter 3 of title II of the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 (120 Stat. 453).
(B) INCLUSIONS.—At a minimum, the report under subparagraph (A) shall include—
(i) a plan to physically modify the Mississippi River-Gulf Outlet and restore the areas affected by the navigation channel;
(ii) a plan to restore natural features of the ecosystem that will reduce or prevent damage from storm surge;
(iii) a plan to prevent the intrusion of saltwater into the waterway;
(iv) efforts to integrate the recommendations of the report with the program authorized under section 7003 and the analysis and design authorized by title I of the Energy and Water Development Appropriations Act, 2006 (119 Stat. 2247); and
(v) consideration of—
(I) use of native vegetation; and
(II) diversions of fresh water to restore the Lake Borgne ecosystem.
(4) CONSTRUCTION.—The Secretary shall carry out a plan to close the Mississippi River-Gulf Outlet and restore and protect the ecosystem substantially in accordance with the plan required under paragraph (3), if the Secretary determines that the project is cost-effective, environmentally acceptable, and technically feasible.

Section 7013 of WRDA 2007 expanded the requirements for the study previously authorized by Public Law 109-234 to include development of a plan for ecosystem restoration and required that a final report on the de-authorization of the MRGO be submitted to the Senate Committee on Environment and Public Works and to the House of Representatives Committee on Transportation and Infrastructure within 180 days of enactment of WRDA 2007. Expanding the report originally required by Public Law 109-234 to include the new requirements imposed by section 7013 of WRDA 2007 will require additional analysis and National Environmental Policy Act (NEPA) documentation, which would significantly delay completion of the report, de-authorization of the MRGO navigation channel, and implementation of the closure structure.

Therefore, the plan for ecosystem restoration, inclusive of the considerations set forth in Section 7013, is preliminarily addressed in this report and will be fully addressed in a supplemental report to be provided to Congress at a later date. The ecosystem restoration plan to be presented in the supplement will be formulated to focus on systematic ecosystem restoration measures for the MRGO area and will include considerations of measures to reduce or prevent damage from storm surge. The formulation process will consider a full range of restoration alternatives. The supplement will be fully compliant with NEPA and will provide sufficient detail to ensure that the recommended ecosystem

plan is consistent with Section 7013, implementable, and supported by a non-Federal sponsor.

Although information regarding ecosystem restoration efforts was gathered and presented as part of this report, ecosystem restoration measures that were not inherent to the direct de-authorization of the MRGO channel were determined to be outside the scope of the study as originally authorized by Public Law 109-234. The formulation of the ecosystem restoration plan will use the information discussed in section 4 of this report and information from other ongoing ecosystem restoration projects in the area, including those discussed below, to develop an ecosystem restoration plan which can be implemented within the authority provided by Section 7013. Additional ecosystem restoration measures will be considered consistent with the requirements of NEPA and USACE policy.

The following provides an overview of ongoing programs, projects, authorities, and studies related to ecosystem restoration in the vicinity of the MRGO channel.

a) The Emergency Supplemental Appropriations to Address Hurricanes in the Gulf of Mexico, and Pandemic Influenza Act of 2006 (Public Law 109-148) appropriated $75,000,000 for "authorized operation and maintenance activities along the Mississippi River-Gulf Outlet channel" and Public Law 109-234 clarified that the funds are to be used for "the repair, construction or provision of measures or structures necessary to protect, restore or increase wetlands, to prevent saltwater intrusion or storm surge." The U.S. Army Corps of Engineers is currently implementing or developing plans to execute this authority. Two shoreline protection projects along the north bank of the MRGO and the south shore of Lake Borgne are under construction. Additional measures under consideration include:

   - Shoreline protection along Lake Borgne flanking the opening of Bayou Bienvenue
   - Shoreline protection along Lake Borgne flanking the opening of Bayou Dupre
   - Shoreline protection along Lake Borgne west of Shell Beach
   - Marsh creation through dedicated dredging within the Golden Triangle
   - Marsh creation through dedicated dredging at Shell Beach

   These actions and modifications or enhancements to these measures will be included in the ecosystem restoration plan.

b) The Corps is currently developing a Louisiana Coastal Protection and Restoration (LACPR) report and Programmatic Environmental Impact Statement for submittal to Congress covering the integration of a plan for flood control, coastal restoration and hurricane protection in south Louisiana. As part of the overall LACPR team, a Habitat Evaluation Team, consisting of USACE, State of Louisiana, and various Federal resource agency members, is developing a suite of coastal restoration alternatives. The Habitat Evaluation Team is evaluating multiple restoration alternatives in addition to the future without project condition to achieve coastal

restoration goals to the maximum extent practical. Each of the alternatives under evaluation is contemplated to include restoration and protection in the vicinity of the MRGO. These ecosystem restoration alternatives are being developed and refined as part of LACPR and will be considered as part of the MRGO ecosystem restoration plan. Examples of ecosystem restoration features being considered as part of the LACPR effort that will be considered in the ecosystem restoration plan include:

- Bayou Bienvenue Diversion
- Bayou LaLoutre Diversion
- Biloxi Marshes Shore Protection
- Bayou Terre aux Boeufs Diversion
- Lake Borgne Marsh Creation
- Mississippi River Gulf Outlet Shoreline Protection
- Bayou LaLoutre Ridge Restoration
- New Orleans East land bridge Marsh Creation
- Central Wetlands Marsh Creation
- South Lake Borgne Marsh Creation
- Biloxi Marsh Creation
- Golden Triangle Marsh Creation
- Violet Diversion
- Breton Landbridge Marsh Creation

The above and other features will be considered in the formulation of the MRGO ecosystem restoration plan. The most up to date information developed as part of the ongoing LACPR study will be used to increase the efficiency of the MRGO ecosystem restoration plan formulation process. The consideration of features developed under LACPR is in compliance with the authority for the MRGO de-authorization study which requires that the plan be consistent with LACPR.

c) The Louisiana Coastal Area (LCA) report recommended plan includes construction of rock breakwaters along the southern shoreline of Lake Borgne for an approximate distance of 15 miles which would protect about 1,350 acres. Breakwaters along the north bank of the MRGO for an approximate distance of 23 miles could protect about 5,000 acres of marsh if deep and shallow draft navigation were to continue on the waterway. In light of the Recommended Plan contained in this report to de-authorize the MRGO channel from the GIWW to the Gulf of Mexico and construct a rock closure structure, the ecosystem restoration plan will need to examine the LCA recommendations and reformulate them if necessary to meet the goals of the MRGO ecosystem restoration plan.

d) The Violet Diversion project is authorized by WRDA 2007 and is intended to divert freshwater from the Mississippi River at or near Violet, Louisiana, for the purposes of reducing salinity in the western Mississippi Sound, enhancing oyster production, and promoting the sustainability of coastal wetlands. The Violet Diversion is expected to protect and restore a significant number of acres. This project is also mentioned in a number of other plans provided by the State and other agencies. There is a potential to

analyze the outputs of the Violet Diversion so as to meet both the salinity and ecosystem restoration goals of the MRGO ecosystem restoration plan.

In addition to the initiatives listed above, the following efforts are ongoing in the MRGO area. They will also be considered as part of the ecosystem restoration plan and the plan will be closely coordinated with the State and other agencies to ensure that the best systematic plan is implemented in the area.

a) The Coastal Wetlands Planning, Protection and Restoration Act (CWPPRA) was enacted in 1990, and this authority established a Federal-State Task Force to work to restore and protect Louisiana's coastal wetlands. The program is implemented using Federal dollars matched with funds from the State of Louisiana. In 1993, the program produced the Louisiana Coastal Wetlands Restoration Plan that outlined the causes of wetlands erosion and identified broad solutions and specific projects to address the problems. The CWPPRA projects within the MRGO area will be considered, reviewed, evaluated, and integrated into the MRGO ecosystem restoration plan.

b) The State of Louisiana also is a Coastal Impact Assistance Program (CIAP) recipient and recently had its initial project implementation plan approved. The initial round of program funding contemplates four projects in the MRGO vicinity. The projects include shoreline protection, marsh creation, wastewater assimilation in wetlands, and fresh water introduction from the Mississippi River.

Existing programs, projects, authorities, and studies provide a strong framework for the development of a systematic ecosystem restoration plan. The items listed above will be considered during the plan formulation process and will ultimately contribute to the final ecosystem restoration plan, which will fully address the requirements set forth in section 7013 of WRDA 2007.

6.3 MRGO PLAN INTEGRATION INTO LACPR

Congressional direction to prepare a deep-draft de-authorization plan for the MRGO also requires that the plan be fully consistent and integrated with the LACPR plan. Development of the LACPR plan focuses on identifying a comprehensive strategy for flood control, coastal restoration, and hurricane protection in south Louisiana. The future of the MRGO navigation channel is a key decision impacting direction on related projects in the area such as hurricane protection, ecosystem restoration and navigation. The Recommended Plan for MRGO de-authorization is being integrated into ongoing work to develop and evaluate measures for the LACPR plan. These measures currently include shoreline protection, marsh creation, freshwater diversions, and levees and storm gates. Specific work to integrate the components of the MRGO plan with the LACPR plan will include storm surge modeling, environmental planning, and prioritization. The Recommended Plan is consistent with all alternatives being evaluated under the on-going LACPR effort and does not conflict with any decisions being considered under LACPR. Every effort has been made to accelerate completion of the MRGO Final Report and LEIS in accordance with the Congressional direction found in Title IV, Chapter 3, Section 4304 of the "U.S. Troop Readiness, Veterans' Care, Katrina Recovery, and Iraq

Accountability Appropriations Act, 2007" (Public Law 110-28). The MRGO Final Report and LEIS will be transmitted to the Congress as soon as is practicable. The MRGO Final Report and LEIS will also be included in the LACPR Final Report.

Table 6.2 Equivalent Annual Benefits and Costs

Equivalent Annual Benefits And Costs
MRGO Deep-Draft De-Authorization Study
Closure Structure
(October 2006 Price Level, 50-Year Period of Analysis, 4.875 Percent Discount Rate, Based on Advanced Design of Recommended Plan)

Investment Costs:		
Total Project Construction Costs	$24,684,150	
Interest During Construction	452,000	
Total Investment Cost	$25,136,150	
Average Annual Costs:		
Interest and Amortization of Initial Investment	$ 1,264,000	
Deep-Draft Transportation Cost	2,500,000	
Shallow-Draft Transportation Cost	1,200,000	
OMRR&R	172,000	
Total Average Annual Costs	$5,136,000	
Average Annual Benefits	$12,500,000	
Net Annual Benefits	$ 7,364,000	
Benefit-Cost Ratio		2.4 to 1
Benefit-Cost Ratio (computed at 7%)**		2.3 to 1

**Per Executive Order 12893

6.4 VIEWS OF THE NON-FEDERAL SPONSOR

Alternative 1 is the most satisfactory to the State of Louisiana. The State of Louisiana has taken a number of significant actions related to the future of the MRGO and clearly identified its position on the de-authorization of the channel. Key pieces of information highlighting the state's position include:

1. A letter from the Governor calling for immediate closure of the MRGO. In a June 2006 letter Governor Blanco wrote General Riley regarding the MRGO stating "I write to unequivocally express the policy of this State regarding the future of the Mississippi River Gulf Outlet (MRGO) … my Advisory Commission on Coastal Protection, Restoration and Conservation has recommended the immediate closure of this channel." (see Appendix A).

2. The completion of a Master Plan for Coastal Protection and Restoration highlighting total closure of the MRGO. The State Master Plan calls for the immediate closure of the MRGO. To quote, “Immediately construct a closure dam

Table 6.3 Economic Costs And Benefits of Recommended Plan

MRGO Deep-Draft De-Authorization Study
Economic Costs And Benefits of Recommended Plan
(October 2006 Price Level, 50-Year Period of Analysis, 4.875 Percent Discount Rate, Based on Advanced Design of Recommended Plan)

Item	Navigation		Total Costs	
	Allocated Costs	Benefits	Allocated Costs	Benefits
Investment Costs:				
Total Project Construction Costs	$24,684,150		$24,684,150	
Interest During Construction	452,000		452,000	
Total Investment Cost	$ 25,136,150		$ 25,136,150	
Average Annual Costs:				
Interest and Amortization of Initial Investment	$1,264,000		$1,264,000	
Deep-Draft Transportation Cost	2,500,000		2,500,000	
Shallow-Draft Transportation Cost	1,200,000		1,200,000	
OMRR&R	172,000		172,000	
Total Average Annual Costs	$ 5,136,000		$ 5,136,000	
Average Annual Benefits		$ 12,500,000		$ 12,500,000
Net Annual Benefits		$ 7,364,000		$ 7,364,000
Benefit-Cost Ratio		2.4 to 1		2.4 to 1
Benefit-Cost Ratio (computed at 7%)*		2.3 to 1		2.3 to 1

*Per Executive Order 12893

at Bayou LaLoutre …" The Master Plan was developed with intensive public input and was unanimously adopted by the Louisiana Legislature.

3. Passage of state appropriations in the current fiscal year dedicated to co-sponsoring MRGO closure. The Fiscal Year 08 State Annual Plan includes funds for the LERRDs associated with the proposed total closure structure.

4. Provision of a letter of interest in serving as the non-Federal sponsor. The State of Louisiana has expressed an understanding of the current law and administration policy regarding implementation of Federal water resources projects. In a letter of intent dated September 25, 2007, the Chair of the Coastal Protection and Restoration Authority of Louisiana (CPRA) expressed the State of Louisiana's interest in sharing the costs of implementing the recommendations of this report ".

. . dependent upon the nature of the local cooperation requirements and their specific costs" (see Appendix O).

5. Self-certification of the non-Federal sponsor's financial capability. The state certified its financial capability to serve as the local cost share sponsor for the MRGO closure plan. (see Attachment 1).

6. Participation in the project Civil Works Review Board and expression of strong commitment and support for the recommended plan.

The State of Louisiana has committed to provide a revised letter of assurance that clearly articulates their desire to serve as the non-Federal sponsor. A letter meeting this requirement is anticipated from the state in November 2007.

6.5 NON-FEDERAL RESPONSIBILITIES

The recommendations are made with the provision that, prior to implementation, the non-Federal sponsor agrees with responsibilities and cost sharing requirements as set forth below.

The plan recommended in the report requires the provision of LERRDs for and OMRR&R of the closure structure at full non-Federal expense. Costs of the recommended plan are shown in summary and in detail in Table 6.4.

In addition, the plan recommends that any measures undertaken or to be undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 of Title II, Chapter 3 of Public Law 109-234 will be implemented conditioned on the non-Federal sponsor for those measures assuming responsibility of OMRR&R of those measures at 100% non-Federal cost. Currently, the Port of New Orleans is the non-Federal sponsor for these measures. The plan recommends that the State of Louisiana assume responsibility for any operation, maintenance, repair, replacement, and rehabilitation associated with these measures.

The Port of New Orleans will continue to serve as the non-Federal sponsor for the MRGO Navigation Project (existing portion of the Mississippi River-Gulf Outlet, Louisiana Project that will remain authorized, from mile 66-60). The required assurances granted by the Port of New Orleans to the United States on April 4, 1957, and March 3, 1975, will remain in full force and effect for the portion of the existing MRGO Navigation Project that will remain authorized. De-authorization of the MRGO channel from mile 60 on the southern bank of the GIWW to the Gulf of Mexico (Mile -9.4) will not affect the Port's assurance, granted to the United States on April 4,1957, to hold and save the United States free from all claims for damages due to construction, maintenance, and operation of original project.

The Port of New Orleans will continue to serve as the non-Federal sponsor for the Mississippi River-Gulf Outlet, Michoud Canal Project. The required assurances granted

by the Port of New Orleans to the United States on February 3, 1969, and January 10, 1974, will remain in full force and effect and will not be affected by de-authorization of the MRGO channel from mile 60 on the southern bank of the GIWW to the Gulf of Mexico (Mile -9.4).

The Port of New Orleans will continue to serve as the non-Federal sponsor for the Inner Harbor Navigation Canal Lock Replacement Project. The non-Federal obligations agreed to by the Port of New Orleans in the Project Cooperation Agreement for Construction of the Deep Draft Increment of the Inner Harbor Navigation Canal Lock Replacement, executed on September 27, 2001, will remain in full force and effect and will not be affected by de-authorization of the MRGO channel from mile 60 on the southern bank of the GIWW to the Gulf of Mexico (Mile -9.4).

Prior to the Federal Government initiating construction of the closure structure, the non-Federal sponsor shall execute an agreement with the Department of the Army agreeing to comply with applicable laws and policies, including but not limited to:

a. Provide all lands, easements, and rights-of-way (LERRDs), including suitable borrow and dredged or excavated material disposal areas, and perform or assure the performance of all relocations determined by the Federal Government, in consultation with the non-Federal sponsor, to be necessary for the construction, operation, maintenance, repair, replacement and rehabilitation (OMRR&R) of the closure structure, all at no cost to the Federal Government.

b. Comply with all applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, Public Law 91-646, as amended (42 U.S.C. 4601-4655), and the Uniform Regulations contained in 49 CFR Part 24, in acquiring lands, easements, and rights-of-way required for construction, operation, and maintenance of the closure structure, including those necessary for relocations, the borrowing of materials, or the disposal of dredged or excavated material; and inform all affected persons of applicable benefits, policies, and procedures in connection with said Act

c. Perform, or cause to be performed, any investigations for hazardous substances that are determined necessary to identify the existence and extent of any hazardous substances regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Public Law 96-510, as amended (42 U.S.C. 9601-9675), that may exist in, on, or under lands, easements, or rights-of-way that the Federal Government determines to be required for the construction, operation, and maintenance of the closure structure. However, for lands that the Federal Government determines to be subject to the navigation servitude, only the Federal Government shall perform such investigations unless the Federal Government provides the non-Federal sponsor with prior specific written direction, in which case the non-Federal sponsor shall perform such investigations in accordance with such written direction.

d. Assume, as between the Federal Government and the non-Federal sponsor, complete financial responsibility for all necessary cleanup and response costs of any CERCLA regulated materials located in, on, or under lands, easements, or rights-of-way that the Federal Government determines to be necessary for the construction, operation, or maintenance of the closure structure.

e. Operate, maintain, repair, rehabilitate, and replace the closure structure at no cost to the Federal Government, in accordance with applicable Federal and State laws and regulations and any specific directions prescribed by the Federal Government.

f. Operate, maintain, repair, replace and rehabilitate any measures undertaken or to be undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 in Title II, Chapter 3 of Public Law 109-234 (3rd Supplemental work) at no cost to the Federal Government in accordance with applicable Federal and State Laws and regulations and specific directions prescribed by the Federal Government.

g. Hold and save the United States free from all damages arising from the construction, operation, maintenance, repair, replacement, and rehabilitation of the closure structure or 3rd Supplemental work, except for damages due to the fault or negligence of the United States or its contractors.

h. Agree, as between the Federal Government and the non-Federal sponsor, that the non-Federal sponsor shall be considered the operator of the closure structure and 3rd Supplemental work for the purpose of CERCLA liability, and to the maximum extent practicable, operate, maintain, repair, rehabilitate, and replace the closure structure and 3rd Supplemental work in a manner that will not cause liability to arise under CERCLA.

i. Prevent obstructions or encroachments on the closure structure and 3rd Supplemental work (including prescribing and enforcing regulations to prevent such obstructions or encroachments), such as any new developments on lands, easements, and rights-of- way or the addition of facilities which might hinder operation and maintenance of the closure structure and 3rd Supplemental work or interfere with their proper function.

j. Comply with all applicable Federal and State laws and regulations, including, but not limited to: Section 601 of the Civil Rights Act of 1964, Public Law 88-352 (42 U.S.C. 2000d) and Department of Defense Directive 5500.11 issued pursuant thereto; Army Regulation 600-7, entitled "Nondiscrimination on the Basis of Handicap in Programs and Activities Assisted or Conducted by the Department of the Army"; and all applicable Federal labor standards requirements including, but not limited to, 40 U.S.C. 3141- 3148 and 40 U.S.C. 3701 – 3708 (revising, codifying and enacting without substantial change the provisions of the Davis-Bacon Act (formerly 40 U.S.C. 276a *et seq.*), the Contract Work Hours and Safety Standards Act (formerly 40 U.S.C. 327 *et seq.*) and the Copeland Anti-Kickback Act (formerly 40 U.S.C. 276c *et seq.*).

k. Not use funds from other Federal programs, including any non-Federal contribution required as a matching share therefore, to meet any of the non-Federal obligations for the Recommended Plan unless the Federal agency providing the Federal portion of such funds verifies in writing that expenditure of such funds for such purpose is authorized.

Table 6.4 Federal and Non-Federal Cost Breakdown

MRGO Deep-Draft De-Authorization Study Federal and Non-Federal Cost Breakdown (October 2006 Price Level, 50-Year Period of Analysis, Based on Advanced Design of Recommended Plan)				
	Responsibility	**Federal**	**Non-Federal**	**Total**
Project First Costs (Construction)				
Mobilization and Demobilization	100% Federal	$85,000		$85,000
Stone Placement - Channel Proper	100% Federal	$11,773,000		$11,773,000
Stone Placement - Overbank Tie-Ins	100% Federal	$403,650		$403,650
Crushed Stone Blanket	100% Federal	$3,400,000	-	$3,400,000
Geotextile Separator Fabric	100% Federal	$31,500	-	$31,500
Clearing and Grubbing (Overbank)	100% Federal	$11,000		$11,000
Engineering and Design	100% Federal	$863,700		$863,700
Construction Management	100% Federal	$1,256,300		$1,256,300
Real Estate*	100% Non-Federal	$125,000	$1,276,000	$1,401,000
Removal of Aids to Navigation	100% Federal	$700,000		$700,000
Contingencies	100% Federal	$4,759,000		$4,759,000
Total Project First Costs		**$23,408,150**	**$1,276,000**	**$24,684,150**
OMRR&R	100% Non-Federal		**$7,860,000**	**$7,860,000**
Total Cost Share		**$23,408,150**	**$9,136,000**	**$32,544,150**

*****Of the total Real Estate costs, $21,000 are associated with acquisition of real estate rights necessary for the construction of the closure structure. For an explanation of additional costs, see Appendix E.

Table 6.5 Existing MRGO Project Features Under Recommended Plan

Existing MRGO Project Features and Authorized O&M Activities	Status under the Recommended Plan (RP)
GIWW Reach (mile 66-60)	
36-ft deep x 500-ft bottom width navigation channel	Not modified or de-authorized under the RP; Remains authorized.
Maintenance dredging of the GIWW Reach of MRGO navigation channel, the turning basin, & Michoud Canal Project	Not modified or de-authorized under the RP; Remains authorized.
Dredge disposal sites adjacent to the MRGO navigation channel and the Michoud Canal Project	Not de-authorized under the RP if required for the operation and maintenance of the GIWW reach of the MRGO navigation channel, the turning basin, the Michoud Canal Project, or the IHNC Lock Replacement Project.
Turning Basin	Not modified or de-authorized under the RP; Remains authorized.
Michoud Canal Project	Not modified or de-authorized under the RP; Remains authorized.
IHNC Lock Replacement Project	Not modified or de-authorized under the RP; Remains authorized.
Existing bank stabilization/foreshore protection along GIWW Reach of MRGO navigation channel	Not modified or de-authorized under the RP; Remains authorized.
Aids to navigation and channel markers	Not modified or de-authorized under the RP; Remain authorized.
Real-estate interests	Retain if required for the operation and maintenance of the GIWW reach of MRGO navigation channel, the turning basin, the Michoud Canal Project, or the IHNC Lock Replacement Project.
Inland Reach (mile 60-23)	
36-ft deep x 500-ft bottom width navigation channel	De-authorized under the RP.
Maintenance dredging of Inland Reach of MRGO navigation channel	De-authorized under the RP.
Dredge disposal sites adjacent to navigation channel	Not de-authorized under the RP if required for the operation and maintenance of the GIWW reach of the MRGO navigation channel, the turning basin, the Michoud Canal Project, or the IHNC Lock Replacement Project.
Existing bank stabilization/foreshore protection along Inland Reach of MRGO navigation channel	De-authorized under the RP but will remain in place; future maintenance of these features will be considered under LACPR or other appropriate authorities.

Measures undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 in Title II, Chapter 3 of Public Law 109-234	OMRR&R becomes a 100% non-Federal responsibility and cost.
Aids to navigation and channel markers	Removed under the RP at the discretion of the United States Coast Guard.
Real-estate interests	Retain if required for the operation and maintenance of the GIWW reach of the MRGO navigation channel, the turning basin, the Michoud Canal Project, the IHNC Lock Replacement Project, or measures undertaken pursuant to the authorization provided under the heading "Operation and Maintenance" in Title I, Chapter 3 of Division B of Public Law 109-148, as modified by Section 2304 in Title II, Chapter 3 of Public Law 109-234.
Sound Reach (mile 23-0)	
36-ft deep x 500-ft bottom width navigation channel	De-authorized under the RP.
Maintenance dredging of Sound Reach of MRGO navigation channel	De-authorized under the RP.
Dredge disposal sites adjacent to navigation channel (including south jetty and Breton Sound point disposal sites)	De-authorized under the RP.
Jetties	De-authorized under the RP but will remain in place; possible reapplication or realignment of these features will be considered under LACPR or other appropriate authorities.
Aids to navigation and channel markers	Removed under the RP at the discretion of the United States Coast Guard.
Real-estate interests	Released or disposed of under the RP.
Bar Channel (mile 0 to -9.4)	
38-ft deep x 600-ft bottom width navigation channel	De-authorized under the RP.
Maintenance dredging of Bar Channel of MRGO navigation channel	De-authorized under the RP.
Dredge disposal sites adjacent to navigation channel (including the ODMDS)	De-authorized under the RP.
Aids to navigation and channel markers	Removed under the RP at the discretion of the United States Coast Guard.
Real-estate interests	Released or disposed of under the RP.

The recommendations contained herein reflect the information available at this time and current Departmental policies governing formulation of individual projects. They do not reflect program and budgeting priorities inherent in the formulation of a National Civil Works construction program nor the perspective of higher review levels within the Executive Branch. Consequently, the recommendations may be modified before they are transmitted to the Congress as proposals for authorization and implementation funding. However, prior to transmittal to the Congress, the sponsor, the state, interested Federal agencies, and other parties will be advised of any modifications and will be afforded an opportunity for further comment.

Alvin B. Lee

Alvin B. Lee
Colonel, U.S. Army
District Engineer – New Orleans

SECTION 7 LIST OF PREPARERS

The following persons were primarily responsible for preparation of this LEIS:

NAME	EXPERTISE/ DISCIPLINE	EXPERIENCE	ROLE IN PREPARING LEIS
Sean Mickal	Biology	12 years Environmental Compliance and Planning, Corps of Engineers, New Orleans District	Environmental Project Manager
Suzanne Hawes	Botany/Fishery Biology	35 years Environmental Resources Specialist, Corps of Engineers, New Orleans District	Principle Scientist, Significant Resources, Document Preparation
Gregory Miller	Coastal Restoration Planning, Project Management	7 years Fisheries Biologist National Marine Fisheries Service, 7 years Project Management, Corps of Engineers, New Orleans District	Project Manager, Plan formulation leader, Public involvement strategy and execution
Richard Broussard	Civil Engineering; dredging, beneficial use and shoreline protection	30 years Technical Manager, Engineering Division, Waterways Section, Corps of Engineers, New Orleans District	Engineering, project design
Michelle Daigle	Civil Engineering	17 years navigation experience with the Corps of Engineers (dredge estimating, hydramodeling, operations)	MRGO Operations Manager
Gary Demarcay	Archaeology	31 years of governmental and contract archaeology	Cultural Resources
Mark Haab	Economics	20 years Navigation Economist, Corps of Engineers, New Orleans District	Navigation
Keith O'Cain	Civil Engineering; dredging, beneficial use and shoreline protection	28 years Functional Team Lead, Engineering Division, Civil Branch, Corps of Engineers, New Orleans District	Engineering, Project design
Andrew Perez	Recreation Impacts Analysis	3 yrs economist, Corps of Engineers, Honolulu District, 1 yr. economist, New Orleans	Recreation Resources

		District, 3 years recreation planner, New Orleans District	
Richard Radford	Visual Resource Management/Landscape Architect	5 years Landscape Architectural Services, Corps of Engineers, New Orleans District	Aesthetics
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Angela Minton	Planning and Project Management	11 years planning experience, government and contract	Asst. Project Manager, Public Involvement, Document review and editing
Mayely Boyce	Environmental Law	7 months Assistant District Counsel, Corps of Engineers, New Orleans District	Legal review
Robert Northey	Environmental Law	13 years Assistant District Counsel, Corps of Engineers, New Orleans	Legal Review
Nicholas Meis	Technical Writing / Editing	15 years technical writing experience, corporate and contract	Document Production

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SECTION 9 ACRONYMS AND ABBREVIATIONS

ADCIRC	Advanced Circulation Model
cfs	cubic feet per second
CHL	Coastal and Hydraulics Laboratory
CIAP	Coastal Impact Assistance Program
Coast 2050 Plan	Coast 2050: Toward a Sustainable Coastal Louisiana Report
CWPPRA	Coastal Wetlands Planning, Protection and Restoration Act
EPA	U.S. Environmental Protection Agency
ERDC	Engineer Research and Development Center
ESA	Environmental Site Assessment
ft	feet
GIWW	Gulf Intracoastal Waterway
IHNC	Inner Harbor Navigation Canal
IWR	Institute for Water Resources
LACPR	Louisiana Coastal Protection and Restoration
LCA	Louisiana Coastal Area
LDEQ	Louisiana Department of Environmental Quality
LDNR	Louisiana Department of Natural Resources
MLG	Mean Low Gulf
mph	miles per hour
MRGO	Mississippi River-Gulf Outlet
NED	National Economic Development
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
O & M	Operations and Maintenance
OCS	Outer Continental Shelf
OSA	Office of the Secretary of the Army
PEIS	Programmatic Environmental Impact Statement
ppt	parts per thousand
RP	Recommended Plan
SAV	Submerged Aquatic Vegetation
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WCSC	Waterborne Commerce Statistics Center

SECTION 10 COMMON AND SCIENTIFIC NAMES OF PLANTS AND ANIMALS

PLANTS
Cane - *Phragmites*
Roseau - *Phragmites australis*
Big cordgrass - *Spartina cynosuroides*
Sea oxeye - *Borrichia frutescens*
Wax myrtle - *Myrica cerifera*
Marsh elder - *Iva frutescens*
Palmetto - *Sabal minor*
Live oak - Q*uercus virginiana*
Sweetgum - *Liquidambar styraciflua*
Hackberry - *Celtis laevigata*
Elm - *Ulmus americana*
Ash – *Fraxinus*

INVERTEBRATES
American oyster - *Crassostrea virginica*
Brown shrimp - *Farfantepenaeus aztecus*
White shrimp - *Litopenaeus setiferus*
Blue crab - *Callinectes sapidus*

FISH
Gulf sturgeon - *Ancipenser oxyrinchus desotei*
Anchovy - *Anchoa mitchilli*
Gulf menhaden - *Brevoortia patronus*
Gray snapper - *Lutjanus griseus*
Atlantic croaker - *Micropogonias undulatus*
Sea trout - *Cynoscion*
Spotted sea trout - *Cynoscion nebulosus*
Sand seatrout - *Cynoscion arenarius*
Black drum - *Pogonias cromis*
Red drum - *Sciaenops ocellatus*
Spot - *Leiostomus xanthurus*
Gulf sheepshead - *Archosargus probatocephalus*
Spanish mackerel - *Scomberomorus maculates*
Southern flounder - *Paralichthys lethostigma*
Blue catfish - *Ictalurus furcatus*

REPTILES
Hawksbill sea turtle - *Eretmochelys imbricate*
Leatherback - *Dermochelys coriacea*
Loggerhead - *Caretta caretta*
Kemp's ridley - *Lepidichelys Kempii*
Alligator - *Alligator mississippienss*

BIRDS
Brown pelican - *Pelecanus occidentalis*
Mallard - *Anas platyrhynchos*
Green-winged teal - *Anas crecca*
Bald eagle - *Haliaeetus leucocephalus*
Piping plover - *Charadrius melodus*

MAMMALS
Opossum - *Didelphis virginiana*
Nine banded armadillo - *Dasypus novemcinctus*
Rabbit - *Sylvalagus*
Fox squirrel - *Sciurus niger*
Gray squirrel - *Sciurus carolinensis*
Muskrat - *Ondatra zibethicus*
Nutria - *Myocaster coypus*
Raccoon - *Procyon lotor*
Mink - *Mustela vison*
River otter - *Luntra canadensis*
Manatee - *Trichechus manatus*

SECTION 11 DISTRIBUTION LIST

The Integrated Final Report to Congress and Legislative Environmental Impact Statement was distributed to Federal, state, parish, and local agencies; tribes; businesses; libraries; museums; universities; environmental organizations, groups, and individuals. The complete distribution list for the Integrated Final Report to Congress and Legislative Environmental Impact Statement is provided in Attachment 2.

SECTION 12 INDEX

Attachment 1

NON-FEDERAL SPONSOR'S
SELF CERTIFICATION OF FINANCIAL CAPABILITY
FOR DECISION DOCUMENTS

NON-FEDERAL SPONSOR'S
SELF-CERTIFICATION OF FINANCIAL CAPABILITY
FOR DECISION DOCUMENTS

I, Robert D. Harper, do hereby certify that I am the Undersecretary of the Louisiana Department of Natural Resources (the "Non-Federal Sponsor"); that I am aware of the financial obligations of the Non-Federal Sponsor for the Mississippi River-Gulf Outlet Deep-Draft De-authorization Project, and that the Non-Federal Sponsor will have the financial capability to satisfy the Non-Federal Sponsor's obligations for that project. I understand that the Government's acceptance of this self-certification shall not be constructed as obligating either the Government or the Non-Federal Sponsor to implement a project.

IN WITNESS WHEREOF, I have made and executed this certification this 16th day of October, 2007.

BY: 

TITLE: Undersecretary

DATE: October 16, 2007

Attachment 2

DISTRIBUTION LIST

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240 W. ST. LOUIS AVE
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LAS VEGAS, NV 89135-1100

I - ADAM JOHNSON
1601 S MARY ST
EUSTIS, FL 32726-5691

I - ADAM JOHNSON
9060 HARTS MILL RD
WARRENTON, VA 20186-8519

I - ADAM WERSHIL
2500 LEE RD 115
WINTERPARK, FL 32789-1705

I - ADAM WILLAUER
859 E CENTER ST
MARION, OH 43302-4348

I - ADELE SHELTON
2355 WESTBROOK DRIVE
TOLEDO, OH 43613-3957

I - ADINA THOMPSON
5628 DAISY AVE
TWENTYNINE PALMS, CA 92277-0000

I - ADRIANA CONTRERAS
9673 RIVERSIDE DRIVE J1
CORAL SPRINGS, FL 33071-0000

I - ADRIENNE EISENBERG
522 MASTHOPE PLANK RD
LACKAWAXEN, PA 18435-9714

I - AGATHA GROFT
3950 COLUMBIA AVE
COLUMBIA, PA 17512-9023

I - AGUSTIN GOBA
PO BOX 5129
SNOWMASS VILLAGE, CO 81615-5129

I - AILEEN PARRISH
122 CRESTWOOD RD
LANDENBERG, PA 19350-9132

I - AL AINSWORTH
10345 SW RIDGEVIEW LN
PORTLAND, OR 97219-6316

I - ALAN CLARK
7030 NW HWY 225A
7030 NW HWY 225A, FL 34482-0000

I - ALAN FAWLEY
3309 LOST VALLEY RD
FORT WAYNE, IN 46818-1636

I - ALAN GOGGINS
18456 VERNON CT
CASTRO VALLEY, CA 94546-2230

I - ALAN URBANY
550 LARKIN ST APT 602
SAN FRANCISCO, CA 94102-3314

I - ALAN WOJTALIK
3723 GREEN OAK CT
PARKVILLE, MD 21234-4258

I - ALCIDES POMINA
915 MAYFIELD RD
WOODMERE, NY 11598-1605

I - ALCIE BAUGHMAN
7591 THOMPSON ROAD
SUMMIT, MS 39666-7535

I - ALEXA BROWN
17524 SE 119TH PL
RENTON, WA 98059-6604

I - ALEXA ROSS
2500 S. ATLANTIC AVE.
DAYTONA BEACH SHORES, FL 32118-

I - ALEXANDER ROUHANA
906 LAKE DESTINY RD UNIT F
ALTAMONTE SPRINGS, FL 32714-6926

I - ALEXANDRA RADBIL
116 MOORE STREET
PRINCETON, NJ 08540-3359

I - ALICE BARTHOLOMEW
415 WALL ST
ELMIRA, NY 14905-2132

I - ALICE DIMICELE
1524 OREGON AVE
MEDFORD, OR 97504-6855

I - ALICE DUGAR
6800 CHESTNUT RD
INDEPENDENCE, OH 44131-3310

I - ALICE KELLY
6493 COOPER ST
FELTON, CA 95018-9409

I - ALICE NEUHAUSER
1466 11TH ST
MANHATTAN BEACH, CA 90266-6108

I - ALICE THOMAS
14818 SW 49 ST
ARCHER, FL 32618-4406

I - ALICE TYLER
PO BOX 308
WILLISTON, FL 32696-0000

I - ALICE VAN LEUNEN
9025 SE TERRACE VIEW COURT
AMITY, OR 97101-2130

I - ALISON LUEDECKE
5 STADLER DR
WOODSIDE, CA 94062-4810

I - ALLEGRA KITCHENS
1027 S. 12TH ST
PALATKA, FL 32177-0000

I - ALLEN LARSON
3408 BEAUTY LAKE RD SW
PILLAGER, MN 56473-2168

I - ALLEN YUN
1613 AUBURN AVE
ROCKVILLE, MD 20850-1143

I - ALLIE NELSON
CRANOKE ST.
CENTREVILLE, VA 20120-0000

I - ALTA BARDSLEY
59 JULIA ANN DR NW
CEDAR RAPIDS, IA 52405-4548

I - AMANDA CARTER
1 ROCKWELL PL APT 2C
BROOKLYN, NY 11217-1129

I - AMANDA GROOVER
470 S MOUNT VERNON AVENUE EXT APT 1
UNIONTOWN, PA 15401-4175

I - AMANDA SCUDER
117 W 58TH ST APT 9H
NEW YORK, NY 10019-1548

I - AMANDA TUCKER
1006 JUDKIN MILL RD
CEDARTOWN, GA 30125-5358

I - AMARANTHA HARRISON
40374 WATERMAN RD
HOMER, AK 99603-9404

I - AMIN ARIKAT
314 NORTH WILDWOOD
HERCULES, CA 94547-3521

I - AMY BOSTICK
21374 DUNN ST
WILDOMAR, CA 92595-9608

I - AMY CAMPBELL
21374 DUNN ST
WILDOMAR, CA 92595-9608

I - AMY FINNEGAN
4217 EAST WEST HWY
BETHESDA, MD 20814-4405

I - AMY GIBSON
9620 EAST PIKE
NORWICH, OH 43767-9726

I - AMY GRAVES
PO BOX 312
MIDDLETOWN, CA 95461-0312

I - AMY GROEN
130 KENSINGTON AVE
MISSOULA, MT 59801-5730

I - AMY HAMALA
1705 S 6TH ST
AUSTIN, TX 78704-3461

I - AMY HARLIB
212 WEST 22ND ST. #2N
NEW YORK, NY 10011-2707

I - AMY PRISCO
58 VILLAGE GRN APT J
BUDD LAKE, NJ 07828-1358

I - AMY SCHUMACHER
311 LINCOLN PARK BLVD
KETTERING, OH 45429-2721

I - ANA RUDOLPH
351 MARIPOSA ST
BRISBANE, CA 94005-1538

I - ANCA VLASOPOLOS
820 NOTRE DAME ST
GROSSE POINTE, MI 48230-1242

I - ANDREA BUREMAN
520 MOUNT PLEASANT DR
LOCUST GROVE, VA 22508-5208

I - ANDREA JOHNSON
210 SOUTHMOOR CIR
STOCKBRIDGE, GA 30281-4968

I - ANDREA VALENZUELA
345 MILITARY E
BENICIA, CA 94510-2810

I - ANDREW COLLINGS
6655 MCCALLUM ST APT 108E
PHILADELPHIA, PA 19119-3125

I - ANDREW SIPOCZ
339 GRAND ISLE LN
DICKINSON, TX 77539-4055

I - ANDREW WOLNIAK
PO BOX 3421
NEW HAVEN, CT 06515-0821

I - ANDY DONIGER
1180 MONTGOMERY NE
ALBUQUERQUE, NM 87111-0000

I - ANDY LYNN
3671 COLONIAL TRL
DOUGLASVILLE, GA 30135-1108

I - ANDY MCCRACKEN
174 CHESTER AVE SE UNIT 133
ATLANTA, GA 30316-1280

I - ANGEL HUERTA
5931 WOODRIDGE ROCK
SAN ANTONIO, TX 78249-3032

I - ANGEL MUEHLENKAMP
205 BURNHAM RD
SUMMERVILLE, SC 29485-5145

I - ANGELA BARTON
182 E. LAKEVIEW AVE.
COLUMBUS, OH 43202-0000

I - ANGELA MARTIN
PO BOX 243
PO BOX 243, WV 26546-0243

I - ANGELA VANCLEVE
6523 NW COUNTY RD. 235
ALACHUA, FL 32615-0000

I - ANGELA WOODCOCK
7701 OAK PARK AVE
VAN NUYS, CA 91406-2122

I - ANGELINA KORB
3725 BIRCHWOOD DR APT 19
BOULDER, CO 80304-1421

I - ANGIE HUGHES
568 EDGEHILL DR
SAINT ALBANS, WV 25177-3782

I - ANGIE MACKEY
11063 TWIN SPRUCE RD
GOLDEN, CO 80403-8460

I - ANITA P. DEFRANTZ, PH.D
1873 APPLING OAKS CIR
CORDOVA, TN 38016-4950

I - ANN ANDERSON
205 VALLEY VIEW RD
HELLERTOWN, PA 18055-9778

I - ANN C. MCGILL
1947 ROCKLYN DR
BRUNSWICK, OH 44212-4071

I - ANN CAWLEY
1709 PACIFIC
ST.JOSEPH, MO 64503-0000

I - ANN CHAPMAN
6635 S. STAPLES #1512
CORPUS CHRISTI, TX 78413-5415

I - ANN COLLEY
1251 AVENUE OF THE AMERICAS
NEW YORK, NY 10020-1104

I - ANN KINGSBURY
4532 OCEAN BOULEVARD 202
SARASOTA, FL 34242-1337

I - ANN MARIE KOTLIK
1719 GRALL AVE
PITTSBURGH, PA 15209-1419

I - ANN MCMULLEN
9339 SILVERCREST DR
SANDY, UT 84093-2315

I - ANN O'DONNELL
HC64BOX740
GLEN ALLEN, MO 63751-0000

I - ANN PEREZ
20 BUTTERNUT KNOLL
MIDDLETOWN, CT 06457-0000

I - ANN STEIN
2224 RIVERSIDE DR
MOBILE, AL 36605-3925

I - ANN STICKEL
7 REDWOOD AVE
WHITESBORO, NY 13492-2314

I - ANN TATE
3914 S RIVER CIRCLE
BIRMINGHAM, AL 35243-4716

I - ANN WISEMAN
402 N MAIN ST
MANSFIELD, IL 61854-0000

I - ANNA HILL
3436 LONDONDERRY CT
3436 LONDONDERRY CT, VA 24018-5058

I - ANNA RUSSELL
190 ALLEN RD
LEMPSTER, NH 03605-3000

I - ANNA SMITH
180 C CR 143
OXFORD, MS 38655-0000

I - ANNA STOLL
1908 SUMMIT AVE
ROSEDALE, MD 21237-1332

I - ANNA STOUDEMIRE
2302 DELLWOOD DR NW
ATLANTA, GA 30305-4009

I - ANNA VELLONE
1455 OCEAN DRIVE #1506
MIAMI BEACH, FL 33139-0000

I - ANNE BERRY
7361 N HAWTHORNE LANE
INDIANAPOLIS, IN 46250-2577

I - ANNE DENITTO
6073 21ST AVE N
ST PETERSBURG, FL 33710-4912

I - ANNE DULFER
105TH AVE SW
105TH AVE SW, WA 98070-0000

I - ANNE DUNLAP
2140 S SHERMAN ST
DENVER, CO 80210-4413

I - ANNE MARKSTEIN
19925 BOLLINGER ROAD
MILLERS, MD 21102-0000

I - ANNE STIRES
1 ANN ST
VERONA, NJ 07044-1905

I - ANNETTE B.
400 RENAISSANCE CTR
DETROIT, MI 48243-1502

I - ANNETTE VAANDRAGER
2525 MARENGO ST
NEW ORLEANS, LA 70115-6209

I - ANNIE LAURIE
115 SICARD AVE
DRACUT, MA 01826-2568

I - ANNIE PHILLIPS
343 E 85TH ST APT 5C
NEW YORK, NY 10028-4557

I - ANTHONY & APRIL DONNICI
9754 N ASH AVE # 130
KANSAS CITY, MO 64157-9742

I - ANTHONY ALBERT
664 NW 18TH STREET
CORVALLIS, OR 97330-5779

I - ANTHONY EDWARDS
1905 CANTERBURY ST
AUSTIN, TX 78702-5506

I - ANTHONY KROPOVITCH
48 WEDGEWOOD DR
WEST SENECA, NY 14224-3624

I - ANTHONY LORENZO
955 42ND ST
SARASOTA, FL 34234-4331

I - ANTHONY MARTIN DAMBROSI
19 BROAD ST
MIDDLETOWN, NY 10940-4003

I - ANTHONY MONTAPERT
11160 VALLEY SPRING PL
NORTH HOLLYWOOD, CA 91602-2617

I - ANTHONY P. VESSICCHIO
66 POPE STREET
NEW HAVEN, CT 06512-0000

I - ANTHONY PARISI
8 PSCHORN LN
HILLSBOROUGH, NJ 08844-1301

I - ANTJE FRAY
58 OLD NORTH ROAD
WASHINGTON, CT 06793-1303

I - ANTON MCINERNEY
128 PARK ST
NORTH READING, MA 01864-2540

I - APRIL BRUMSON
PO BOX 796
PUTNEY, VT 05346-0796

I - APRIL INGLE
194 MACON AVE
ATHENS, GA 30601-2038

I - ARDITH ARRINGTON
505 BOYLSTON AVE E APT 402
SEATTLE, WA 98102-4985

I - ARLEEN RAYMOND
26 BIRK STREET
SADDLE BROOK, NJ 07663-5222

I - ARLENE MEDDER
123 LONG SHADOW PL
DURHAM, NC 27713-8639

I - ARNETTE SHERMAN
1325 S. SPRING GARDEN AVE
DELAND, FL 32720-0000

I - ARTHUR ALLEN
13 TOWN FARM RD
PRINCETON, MA 01541-1222

I - ARTHUR DANIELS
10492 GALLERIA ST
WELLINGTON, FL 33414-3160

I - ARTHUR FIRTH
1011 EMERALD BAY DR
SALISBURY, NC 28146-1586

I - ARTHUR NORRIS
21824 BARSTOW RD
EAST MOLINE, IL 61244-9536

I - ARTHUR SCHMITT
530 N SILVER ST
BAD AXE, MI 48413-1543

I - ASHLEY NOTTINGHAM
1803 1ST AVE
ALTOONA, PA 16602-3504

I - AUBREY BURSCH
519 CASEY LN
ROCKVILLE, MD 20850-7744

I - AUDEN COLEMAN
201 GINGER LN
EASLEY, SC 29642-1319

I - AUDREY J. ANDERSON
122 HILLVIEW AVENUE
LOS ALTOS, CA 94022-3741

I - AUSTIN ALWOOD
1107 S MINERAL SPRINGS RD
DURHAM, NC 27703-0000

I - AVA MCVEY
2121 CARMEL VALLEY DR
LA PLACE, LA 70068-1813

I - AXEL RINGE
1840 LAFAYETTE RD
NEW MARKET, TN 37820-5305

I - B. L. MELTON
2332 GODWIN CIR
ORANGE, TX 77630-2214

I - BABARA PUETT
3104 MISTYGLEN CIR
AUSTIN, TX 78746-7811

I - BARB JAMES
30W050 BATAVIA RD
WARRENVILLE, IL 60555-0000

I - BARB VARELLAS
862 AVENIDA BERNARDO
SAN DIMAS, CA 91773-3937

I - BARBARA APPLETON
2701 W LIVINGSTON ST
ALLENTOWN, PA 18104-3531

I - BARBARA BACON
6317 MENDIUS AVE NE
ALBUQUERQUE, NM 87109-4125

I - BARBARA BRODBECK
3942 FLAG DRIVE
PALM BEACH GARDENS, FL 33410-4774

I - BARBARA BUSSE
3102 E CLARENDON AVE UNIT 102
PHOENIX, AZ 85016-7098

I - BARBARA CATON
PO BOX 2175
AVILA BEACH, CA 93424-2175

I - BARBARA COOPER
1205 LANDINGS LOOP
TALLAHASSEE, FL 32311-0000

I - BARBARA DREW
245 SENTINEL AVE
NEWTOWN, PA 18940-1167

I - BARBARA FRY
3022 EDWARDS ST
ALTON, IL 62002-4056

I - BARBARA GREEN
17078 HALL RD
CLATSKANIE, OR 97016-2710

I - BARBARA HORNING
1804 PINECONE CT
MORGAN HILL, CA 95037-7049

I - BARBARA JONES
1120 E ALAMEDA DR
TEMPE, AZ 85282-3957

I - BARBARA KEATING
182 OLD DEAN ROAD
NORTON, MA 02766-0000

I - BARBARA LAMBROS
5216 MATANZAS WAY
JACKSONVILLE, FL 32211-5585

I - BARBARA LYNCH
6513 KANSAS LN
TAKOMA PARK, MD 20912-4719

I - BARBARA MASON
1493 WESTMONT AVE
CAMPBELL, CA 95008-5903

I - BARBARA MATTHES
2803 GROVEWOOD AVE
CLEVELAND, OH 44134-1911

I - BARBARA MORTON
7 BIG OAK LANE
RIVERWOODS, IL 60015-2401

I - BARBARA NEWMAN
940 TAVEL DRIVE
KENNER, LA 70065-1925

I - BARBARA SANDERS
519 OXFORD COURT
ORLANDO, FL 32803-6720

I - BARBARA SILVER
256 DAVIS ROAD
BLUE RIDGE, GA 30513-0000

I - BARBARA TONSBERG
220 SKY OAKS DR
ANGWIN, CA 94508-9630

I - BARBARA TUCKER
1312 ESSEX DRIVE
WELLINGTON, FL 33414-5610

I - BARBARA VIKEN
1750 WASHINGTON ST APT 4
SAN FRANCISCO, CA 94109-3628

I - BARBARA WATSON
3650 THOMPSON RD
LAKE MARY, FL 32746-4047

I - BARRY TUSCANO
354 GRAVE YARD HILL RD
BOLIVAR, PA 15923-2010

I - BARTON HILL
18388 HIGHWAY 49
SAUCIER, MS 39574-8902

I - BEAR PAUL VANDERGOOT
1530 TROSPER RD
GREENSBORO, NC 27455-1226

I - BEATRICE HOWARD
1320 ADDISON ST APT C240
BERKELEY, CA 94702-1739

I - BECKY GREENLEE
974 BRECKENRIDGE LN # 284
LOUISVILLE, KY 40207-4619

I - BEN BRADLEY
826 AURORA AVE
BOULDER, CO 80302-7110

I - BENJAMIN BURTON
69 GREENWICH STREET
BERGENFIELD, NJ 07621-0000

I - BENJAMIN FARRELL
1685 OCEAN BAY DR
VIRGINIA BEACH, VA 23454-6809

I - BERNARD J GRISEZ
2908 OLD HIGHWAY 8
ST ANTHONY VILLAGE, MN 55418-2511

I - BERNARD LEGRAND
3115 LAYNE CT
LA PORTE, TX 77571-7055

I - BERNARD YOKEL, PHD
313 POND RD
MOUNT DORA, FL 32757-9643

I - BERT FOX
2337 NE 39TH AVE
PORTLAND, OR 97212-5414

I - BETH BACH
2100 HAPPY CREEK ROAD
SEYMOUR, TN 37865-5406

I - BETH FRANKS
418 CHISHOLM TRL
CINCINNATI, OH 45215-2516

I - BETH GEHMAN
141 MARKED TREE RD
NEEDHAM, MA 02492-1624

I - BETH RICHMAN
PO BOX 912
CRESTONE, CO 81131-0912

I - BETH ROCKWELL
132 W 23RD ST APT 313
ERIE, PA 16502-2851

I - BETSY LAMBERT
355 CORONADO AVE
LONG BEACH, CA 90814-2671

I - BETTE GROTEGUT
5824 SW ARNOLD ST
PLATTSBURG, MO 64477-9326

I - BETTINA BOWERS SCHWAN
4905 TANGLEWOOD DRIVE
NASHVILLE, TN 37216-1419

I - BETTINA LAMBERT
355 CORONADO AVENUE #16
LONG BEACH, CA 90814-8179

I - BETTY BENSON
2950 INDIAN HILL DRIVE
JACKSONVILLE, FL 32257-5723

I - BETTY FELDT
618 W LAKESIDE ST
MADISON, WI 53715-1730

I - BETTY J. VAN WICKLEN
41 LAKE SHORE DRIVE
WATERVLIET, NY 12189-2915

I - BETTY SHIPLEY
9620 W MARLASUE ST
CRYSTAL RIVER, FL 34428-0000

I - BETTY YOUNG
608 MEADOW TOP
CONVERSE, TX 78109-1636

I - BEVERLEE GOYNES
466 BRANCHVILLE RD
RIDGEFIELD, CT 06877-6029

I - BEVERLY LONGNECKER
1524 JUPITER ROAD
VENICE, FL 34293-0000

I - BEVERLY NELMES
6100 12TH ST. S APT. 315
SAINT PETERSBURG, FL 33705-5661

I - BIANCA CONSTANCE
384 W HUDSON AVE
ENGLEWOOD, NJ 07631-1407

I - BILL & MARILYN VOORHIES
38 CLARK POINT RD PO BOX 231
WEST TREMONT, ME 04612-0231

I - BILL CRETEN
INFRASTRUCTURE ALT
960 W. RIVERCENTER, SUITE B
COMSTOCK PARK, MI 49321

I - BILL ERICKSON
5913 SE HOLGATE BLVD
PORTLAND, OR 97206-3831

I - BILL GRANT
1500 DUVAL DR
GODFREY, IL 62035-1608

I - BILL HUTTO
PO BOX 424
BAY SPRINGS, MS 39422-0000

I - BILL KARNOFSKY
1439 GRAND CAYMAN CIR
1439 GRAND CAYMAN CIR, FL 33884-0000

I - BILL MCPHERSON
5721 MAGAZINE ST # 145
NEW ORLEANS, LA 70115-3209

I - BILL RANKINE
MANAGER MARINE TECHNICAL SERVICES
CITGO PETROLEUM CORPORATION
1293 ELDRIDGE PARKWAY
HOUSTON, TX 77077

I - BILL ROSENTHAL
3705 PERDEW DRIVE
LAND O' LAKES, FL 34638-0000

I - BILL STOKES
301 2ND ST. N. #18
ST. PETERSBURG, FL 33701-0000

I - BILLIE OZERENGIN
215 E 80TH ST
NEW YORK, NY 10021-0531

I - BILLY MARCHAL
BRING NO BACK COMMISSION
279 AUDUBON BLVD.
NEW ORLEANS, LA 70125

I - BITSA BURGER
PO BOX 2514
GUERNEVILLE, CA 95446-2514

I - BJ BILINSKY
7040 HARBOR VIEW DR.
LEESBURG, FL 34788-0000

I - BK GARDNER,LMT
4021 SOUTHWEST 124TH COURT
MIAMI, FL 33175-2941

I - BO BAGGS
3565 LAKE ARTHUR DR
PORT ARTHUR, TX 77642-7601

I - BOB AMOS
PORT SOLUTIONS
2 CANAL STREET, SUITE 2344
NEW ORLEANS, LA 70130

I - BOB BRISTER
1102 S 800 E # A
SALT LAKE CITY, UT 84105-1206

I - BOB JOHNSTON
PO BOX 1126
COOKE CITY, MT 59020-1126

I - BOB MEISSLER
331 TEQUESTA DR UNIT 222
TEQUESTA, FL 33469-3401

I - BOB ROSENBERG
32 TOUSSIN AVE
KENTFIELD, CA 94904-1421

I - BOB SEGAL
315 E LESTER ST
TUCSON, AZ 85705-8921

I - BOB THOMAS
2001 WEAVER RD
MYRTLE CREEK, OR 97457-8704

I - BOB VILLERS
9109 PEMBROKE CT
SHERRILLS FORD, NC 28673-5003

I - BOBBIE FLOWERS
418 W 17TH ST APT 22A
NEW YORK, NY 10011-5826

I - BOBBY & MARLENE CROWE
225 ISAIAH TRAIL
BELGRADE, MT 59714-0000

I - BOBBY MOORE
32 GPS APT 14B
NEW YORK, NY 10003-0000

I - BOBBY WYNN
122 BAG END RD
HENDERSONVILLE, NC 28739-2286

I - BONNIE JOHNSON
4429 JASPER STREET
METAIRIE, LA 70006-2825

I - BONNIE LEIGH
47 W MALLARD CREEK DRIVE
FREEPORT, FL 32439-4177

I - BONNIE MCCUNE
7841 SW 103 PLACE
MIAMI, FL 33173-2928

I - BONNIE MCGILL
807 COLLEGE AVE APT 10
CLEMSON, SC 29631-1057

I - BONNY MILLER
5523 ENGLISHMAN PL
ROCKVILLE, MD 20852-0000

I - BRADLEY A HARRIS
PO BOX 11875
FORT SMITH, AR 72917-1875

I - BRADLEY GORDON
PO BOX 113
SEBASTOPOL, CA 95473-0113

I - BRADLEY WAGSTAFF
3203 MAUREPAS ST.
NEW ORLEANS, LA 70119-0000

I - BRAND SHELTON
2922 E CALLE RABIDA
TUCSON, AZ 85706-2778

I - BRANDY CORDOVA
2841 W 65TH AVE
DENVER, CO 80221-2313

I - BRANWEN GREGORY
1766 N LAS PALMAS AVE
LOS ANGELES, CA 90028-4810

I - BRENDA BROWN
5 PAJARO AZUL DR
PLACITAS, NM 87043-8834

I - BRENDA MABBITT
2750 PIERCE STREET
HOLLYWOOD, FL 33020-3887

I - BRENDA RASHLEIGH
568 CASTALIA AVE
ATHENS, GA 30606-4302

I - BRENDA THOMPSON
4564 OLIVE AVENUE
LA MESA, CA 91941-4829

I - BRENDAN HUGHES
316 MESQUITE AVE
RIDGECREST, CA 93555-2618

I - BRETT CLOUD
929 MARION ST APT 104
DENVER, CO 80218-3056

I - BRIAN & RITA COHEN
3852 E ALAMOS AVE APT 125
FRESNO, CA 93726-0874

I - BRIAN BODAH
PO BOX 4
OLEMA, CA 94950-0004

I - BRIAN BROWN
87 HENRY B LN
LEWISBURG, PA 17837-7067

I - BRIAN FINK
440 W SEDGWICK ST # D322
PHILADELPHIA, PA 19119-3045

I - BRIAN GIBBONS
9133 EDMONSTON TER APT 304
GREENBELT, MD 20770-4568

I - BRIAN SUTPHIN
1056 SLATE RD
KING, NC 27021-8020

I - BRIAN WEATHERBY
9747 PHILLIPS RD SE
PORT ORCHARD, WA 98367-8744

I - BRIDGET ALLEN
PO BOX 48406
LOS ANGELES, CA 90048-0406

I - BRIDGET O'NEILL
609 W CHURCH ST APT 32
CHAMPAIGN, IL 61820-3390

I - BRIGETTE CARLSON
465 ENTRADA DR
GOLDEN, CO 80401-4873

I - BRITTIN LOEWY
8 SAINT JAMES PL
GLEN COVE, NY 11542-2225

I - BROOK & LINDA HALL
9462 LIME AVE
FONTANA, CA 92335-5356

I - BROOKE BRYANT
109 N MANSFIELD AVE
LOS ANGELES, CA 90036-3020

I - BRUCE COHEN
7 WARE ST
WORCESTER, MA 01602-2823

I - BRUCE REED
801 PINE ST APT 11G
SEATTLE, WA 98101-1807

I - BRYANT HAMMETT, JR.
SECRETARY-STATE OF LOUISIANA
DEPARTMENT OF WILDLIFE AND
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426 E. 4TH ST
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582 SW BLUFF DRIVE
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I - C. HALL
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167 BEAMAN ROAD
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I - CALLIE RILEY
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3390 CRYSTAL SPRINGS DR NE
BAINBRIDGE ISLAND, WA 98110-2039

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I - CARLA HAMMAR
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I - CARLO POPOLIZIO
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I - CAROL PETERSON
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I - CAROL SCHAMING
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I - CAROLE GOODYEAR
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I - CAROLE TANTE
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I - CAROLYN MCDADE
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ORMOND BEACH, FL 32176-2323

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TRUTH OR CONSEQUENCES, NM 87901-

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665 URSULINE DR
BATON ROUGE, LA 70808-4771

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HC 81 BOX 640
QUESTA, NM 87556-9706

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RR 2 BOX 48D
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I - CATHY THREADGILL
12181 MCCULLA DRIVE
TUSTIN, CA 92782-1177

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, AZ 85014-0000

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I - CHRISTINE PASMORE
14032 VICTORIA DRIVE
VICTORVILLE, CA 92395-5610

I - CHRISTOPHER GALTON
106 BLACK RIVER RD
MYRTLE BEACH, SC 29588-7413

I - CHRISTOPHER SEGO
1070 SHIMMERING SAND DRIVE
OCOEE, FL 34761-9138

I - CHRISTOPHER SEKULSKI
1438 N MERIDIAN RD #3
TALLAHASSEE, FL 32303-0000

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BIRMINGHAM, AL 35205-0000

I - CHUCK MITCHELL
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SOUTH DAYTONA, FL 32119-8557

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MILLIS, MA 02054-0000

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GREENWICH, CT 06831-2536

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ST PETERSBURG, FL 33701-4445

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I - COLLEEN GRAY
4475 S LOWELL BLVD
DENVER, CO 80236-3602

I - COLLEEN RODGER
3450 MARKET STREET APT. 401
SAN FRANCISCO, CA 94114-2770

I - CONNELL MORRISON
1922 DUKER AVE
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1712 FRANKLIN ST
BELLEVUE, NE 68005-3454

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310 FISHER DR.
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I - COURTNEY GARTIN
5250 AREZZO DR
SAN JOSE, CA 95138-2203

I - COURTNEY KOSNIK
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WARREN, MI 48092-1355

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3731 S GLENSTONE AVE LOT 112
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16383 CULLEN RD
DEFIANCE, OH 43512-8836

I - DAVID RIECKMANN
W3268 BUFFALO HILLS RD
PARDEEVILLE, WI 53954-9628

I - DAVID ROSENBERG
8930 N REGENT RD
BAYSIDE, WI 53217-1750

I - DAVID ROSENSTEIN
302 AMALFI DR
SANTA MONICA, CA 90402-1128

I - DAVID ROTH
1303 S WALTER REED DR APT 201
ARLINGTON, VA 22204-4932

I - DAVID RUCH II
208 NE MONROE CIRCLE N
ST. PETERSBURG, FL 33702-0000

I - DAVID SORENSEN
6804 138TH ST
KEW GARDENS HILLS, NY 11367-1630

I - DAVID WILCOX
440 LORRAINE ST APT 1N
GLEN ELLYN, IL 60137-4358

I - DAWN CREIGHTON
8529 N 61ST AVE APT 25
GLENDALE, AZ 85302-5466

I - DAWNHEATHER SIMMONS
PO BOX 872198
VANCOUVER, WA 98687-2198

I - DAWOOD ZWINK
31 SWALLOWTAIL RD
SCARBOROUGH, ON M1B 6B4

I - DEAN PETTIT
1666 PRIVATEER DRIVE
TITUSVILLE, FL 32796-1567

I - DEANE ROSEN
904 S 46TH ST APT 1
PHILADELPHIA, PA 19143-3729

I - DEANN ALEX
670 WHARTON
YPSILANTI, MI 48198-0000

I - DEANN MCTAVISH
4715 NW 90TH STREET
KANSAS CITY, MO 64154-0000

I - DEB MERCHANT
5415 SW 149TH AVE
BEAVERTON, OR 97007-7727

I - DEBBIE BORGONO
40 THE PLACE
GLEN COVE, NY 11542-0000

I - DEBBIE BROWN
133 HIGHVIEW DR
LANCASTER, PA 17602-2623

I - DEBBIE BURACK
350 E 52ND ST
NEW YORK, NY 10022-6727

I - DEBBIE GINIEWICZ
28 THAYER POND DR UNIT 16
NORTH OXFORD, MA 01537-1124

I - DEBBIE HARE
12554 WATERHAVEN CR.
ORLANDO, FL 32828-0000

I - DEBBIE HUFFMAN
PO BOX 130461
HOUSTON, TX 77219-0461

I - DEBBIE HUTCHERSON
3739 BOGNER DRIVE
WOODBRIDGE, VA 22193-0000

I - DEBBIE IRELAND
148 1/2 W WATER ST APT 3
OAK HARBOR, OH 43449-1371

I - DEBBIE SANDERS
1213 ELBERON AVENUE
SALEM, OH 44460-3564

I - DEBBIE SLACK
418 JEFFERSON DR
LYNCHBURG, VA 24502-3057

I - DEBBIE SPAHN
1240 BEL AIRE DR. W.
PEMBROKE PINES, FL 33027-0000

I - DEBBIE WOODS
226 ENVIRONS ROAD
POTOMAC FALLS, VA 20165-0000

I - DEBORAH LANCMAN
3040 BRANT ST
3040 BRANT ST, CA 92103-5532

I - DEBORAH LANDOWNE
108 BELLE AVE
SAN RAFAEL, CA 94901-3408

I - DEBORAH MEDENICA
2300 PEACOCK LN
BIRMINGHAM, AL 35223-1712

I - DEBORAH PETERSEN
2532 ISLAND DR NW
OLYMPIA, WA 98502-9749

I - DEBORAH SMITH
3044 NW 30TH ST
OKLAHOMA CITY, OK 73112-6908

I - DEBORAH STEPHENSON
1925 STATE HIGHWAY M
CEDARCREEK, MO 65627-8415

I - DEBORAH WISSMAN
800 DIANE DR
CINCINNATI, OH 45245-1106

I - DEBRA EADES
2254 STANDING SPRINGS RD
GREENVILLE, SC 29605-6048

I - DEBRA GABLE
618 WALNUT AVE
SANTA CRUZ, CA 95060-3638

I - DEBRA HULSE
7638 LODGE POLE TRAIL
WINTER PARK, FL 32792-0000

I - DEBRA REHN
5130 SE 30TH AVE APT 9
PORTLAND, OR 97202-4557

I - DEBRA SAUDE
1050 PLEASANT VALLEY RD
SWEET HOME, OR 97386-1033

I - DEBRA TAYLOR
93 JOHNSON DR.
EMPIRE, AL 35063-0000

I - DEBRA TOMIM
18950 E. STATE HWY 94
COLORADO SPRINGS, CO 80930-0000

I - DEBRA VEEDER
103 FOX HOLLOW BND
BRANDON, MS 39047-9053

I - DEDE HARRIS
350 N 102ND ST
SEATTLE, WA 98133-9118

I - DELL BROOKE
3204 FERNWAY RD
BIRMINGHAM, AL 35223-1326

I - DELLA CASEY
2592 LAKEVIEW CT.
COOPER CITY, FL 33026-0000

I - DEMELZA COSTA
28626 RIDGEWAY RD
SWEET HOME, OR 97386-9523

I - DENA GARCIA
4805 CITRUS OAK LANE
SAINT CLOUD, FL 34771-8900

I - DENIS BRENNAN
2561 S BELLFORD STREET
PHILADELPHIA, PA 19153-1410

I - DENISE FARRELL
789 DEMARRAIS PLACE
ORADELL, NJ 07649-0000

I - DENISE GAULT
PO BOX 5747
CARMEL, CA 93921-5747

I - DENISE PONCE
1 WILLOW DRIVE
GRETNA, LA 70053-4837

I - DENISE SPENCER
619 ADAMS ST
QUINCY, IL 62301-5336

I - DENNIS DAVIE
PO BOX 651
CAPITOLA, CA 95010-0651

I - DENNIS FEICHTINGER
2711 RIVERSIDE DR APT 4
TRENTON, MI 48183-2830

I - DENNIS HAMMETT
HC 33 BOX 80
ROLLA, MO 65401-8810

I - DENNIS HUBER
1466 WILLOWBROOK DRIVE
BOALSBURG, PA 16827-1670

I - DENNIS J. LENZ
3 IVORY CT
EAST NORTHPORT, NY 11731-6331

I - DENNIS LEDDEN
14941 TRINIDAD DR
RANCHO MURIETA, CA 95683-9451

I - DENNIS MCKINSTRY
49 WESTWOOD DR
STURBRIDGE, MA 01566-1350

I - DENNIS MORLEY
104 THROCKMORTON LN
OLD BRIDGE, NJ 08857-2221

I - DENNIS RUTKOWSKI
200 N EL CAMINO REAL SPACE 166
OCEANSIDE, CA 92054-0809

I - DEREK CS BURR
14400 CEMETERY ROAD
FORT MYERS, FL 33905-7329

I - DIANA ALLARD
8453 GRAND AVE
OMAHA, NE 68134-3107

I - DIANA GROB
PO BOX 2274
GRESHAM, OR 97030-0635

I - DIANA HARTLEY
125 CHAPS LN
WEST CHESTER, PA 19382-6156

I - DIANA PERRY
78 BRADSTREET AVENUE
LOWELL, MA 01851-4121

I - DIANA SHOLTZ
PO BOX 525
SAXTONS RIVER, VT 05154-0525

I - DIANA SMITH
1521 NE 100TH ST
SEATTLE, WA 98125-7617

I - DIANA WINER
E10421 LOMBARD RD
WESTBY, WI 54667-8366

I - DIANE AMAN
17120 MOUNT VERNON ST
SOUTHFIELD, MI 48075-8004

I - DIANE AMES
6708 WALDO AVE.
EL CERRITO, CA 94530-2936

I - DIANE BARABY
PO BOX 9
HILL, NH 03243-0009

I - DIANE CAMPION
1602 ALTON RD 92
MIAMI BEACH, FL 33139-2421

I - DIANE CLARK
PO BOX 64
WOOLWINE, VA 24185-0064

I - DIANE MOELLER
3913 W SAN NICHOLAS ST
TAMPA, FL 33629-6309

I - DIANE SALLINGER
26 GWEN PARKWAY
BOYCE, LA 71409-0000

I - DIANE SCHRIER
5111 NORTHEAST 4TH ST
OCALA, FL 34470-0000

I - DIANE SHOMO
1435 DUFF LN
MILFORD, MI 48381-2614

I - DIANE VOGELMAN
PO BOX 806
EDWARDS, CO 81632-0806

I - DIANNE DOUGLAS
2723 E. VALENCIA DRIVE
PHOENIX, AZ 85042-8072

I - DIANNE HINCH
152 S. BUDDING AVE. #201
VIRGINIA BEACH, VA 23452-1353

I - DIANNE WARREN
2344 CAMBRIDGE DRIVE
SARASOTA, FL 34232-3818

I - DINA GRASSO
2850 S SHERIDAN ST
PHILADELPHIA, PA 19148-4827

I - DINDA EVANS
PO BOX 178695
SAN DIEGO, CA 92177-8695

I - DINENE MCCLURE
4014 CHICO AVE
SANTA ROSA, CA 95407-6504

I - DINI SCHUT
2355 HEMPSTEAD ROAD
TOLEDO, OH 43606-2447

I - DIXIE GRUBBS
5416 36TH ST E.
BRADENTON, FL 34203-0000

I - DOLORES MAULOFF
6842 W HIGGINS AVE
CHICAGO, IL 60656-2036

I - DON BROCKWAY
255 ROLLINGWOOD DR
ATHENS, GA 30605-3329

I - DON MARGESON
439 TENNESSEE AVE. NE
ST. PETERSBURG, FL 33702-0000

I - DON MCKEE
PO BOX 2040
PASCAGOULA, MS 39569-2040

I - DON MCKELVEY
765 E 236TH ST
EUCLID, OH 44123-2515

I - DON RICHARDSON
577 WINDOVER DRIVE
BREVARD, NC 28712-9383

I - DONALD BRYANT
11612 BLUEWATER HIGHWAY
LOWELL, MI 49331-9254

I - DONALD CHAMPAGNE
974 BAYOU DULARGE RD
HOUMA, LA 70363-7613

I - DONALD COX
207 MOUND ST
THE PLAINS, OH 45780-1076

I - DONALD DODGE
300 CASELLI AVE
SAN FRANCISCO, CA 94114-2325

I - DONALD GARLIT
49651 SHENANDOAH CIR
CANTON, MI 48187-1163

I - DONALD HYATT
4773 HAYDEN BLVD
COLUMBUS, OH 43221-5518

I - DONALD KURZ
6107 ELSTON RD
JEFFERSON CITY, MO 65109-3186

I - DONALD MUNN
432 158TH ST SE
BOTHELL, WA 98012-1205

I - DONALD STEVENS
2725 ABBEY ROAD
WINTER PARK, FL 32792-0000

I - DONALD W. WOOD
2102 COACH DR
NAPERVILLE, IL 60565-2473

I - DONLON MCGOVERN
4107 NE 24TH AVE
PORTLAND, OR 97211-6411

I - DONNA BAILEY
46 N OAK AVE
UMATILLA, FL 32784-8603

I - DONNA BOLLENBACH
2108 BUTCH CASSIDY TRL
WIMAUMA, FL 33598-0000

I - DONNA BORTHWICK
3423 BARABOO LN
DEKALB, IL 60115-8281

I - DONNA BRUNET
3009 LYNNWOOD DRIVE
COLUMBIA, MO 65203-2944

I - DONNA BUSH
404 JENNIFER LANE
PEARL RIVER, LA 70452-3255

I - DONNA CARLSI
15930 INDIAN FLAT RD
NEVADA CITY, CA 95959-8754

I - DONNA CASSIDY-HANLEY
151 BAKER HILL RD
FREEVILLE, NY 13068-5614

I - DONNA COHEN
1 PARTRIDGE RD
1 PARTRIDGE RD, MA 01748-2639

I - DONNA FUNK-SMITH
633 TREYS DR
WINCHESTER, VA 22601-3231

I - DONNA HODSDON
PO BOX 518 5043 HIGHWAY 72
NEW PLYMOUTH, ID 83655-5238

I - DONNA JAGGARD
5455 N SHERIDAN RD APT 602
CHICAGO, IL 60640-1921

I - DONNA LEWIS
12921 OXNARD ST
VAN NUYS, CA 91401-4106

I - DONNA MALKKI
, FL 34957-0000

I - DONNA MANDERS
7727 12TH AV NW
SEATTLE, WA 98117-4136

I - DONNA MARKS
250 JENNY LIND DR
HARPERS FERRY, WV 25425-3139

I - DONNA PEMBERTON
2512 COCONUT DR
COCOA, FL 32926-4309

I - DONNA PLUTSCHUCK
439 S QUAY ST
LAKEWOOD, CO 80226-3323

I - DONNA SCHLOSSBERG
960 DIVISION STREET
BAYPORT, NY 11705-1007

I - DONNA SEYMOUR
8 CEDAR ST
POTSDAM,, NY 13676-2019

I - DONNA SMITH-REMICK
3041 CENTURY LN
BENSALEM, PA 19020-2003

I - DOREEN TIGNANELLI
29 COLBURN DR
POUGHKEEPSIE, NY 12603-5103

I - DORIS CAREY
11NORTH RIDING DRIVE
CHERRY HILL, NJ 08003-0000

I - DOROTHY BIRCH
6601 RIDGE CREST DRIVE
MILTON, FL 32570-3670

I - DOROTHY CINQUEMANI
400 LAKE AV NE S210
LARGO, FL 33771-0000

I - DOROTHY FOSTER
3522 SW 33RD TER
TOPEKA, KS 66614-3341

I - DOROTHY GREEN
115 CONCORD PL APT 4
THIENSVILLE, WI 53092-1244

I - DOROTHY JONES
285 W MAIN ST
MUNFORD, TN 38058-6067

I - DOROTHY OURS
70 DUNKARD CHURCH RD
STOCKTON, NJ 08559-1405

I - DOROTHY RIDDLE
2647 N MILLER RD UNIT 12
SCOTTSDALE, AZ 85257-1628

I - DOROTHY WELLS
4104 BAKER LN
NOTTINGHAM, MD 21236-1053

I - DOROTHY WILLINGHAM
P.O. BOX 516
NEWBERRY, FL 32669-0000

I - DORTHA MARQUIS
124 MARSH CR WDSVL ROAD
HOPEWELL, NJ 08525-2819

I - DOTTIE EDDIS
PO BOX 88
AUGUSTA, WV 26704-0088

I - DOUG LA FOLLETTE
PO BOX 7848
MADISON, WI 53707-7848

I - DOUG REINEKE
1500 GILBERT RD
KENNESAW, GA 30152-4808

I - DOUG RIEL
PO BOX 577
MOLINE, IL 61266-0577

I - DOUG SHOHAN
95 VIA MARIA
LEE, MA 01238-9354

I - DOUGLAS ESTES
629 ARGUELLO BLVD APT 303
SAN FRANCISCO, CA 94118-4063

I - DOUGLAS MCNEILL
33T RIDGE RD
GREENBELT, MD 20770-0718

I - DOUGLAS PARKER
2817 CROSS LANE
MARIANNA, FL 32446-6741

I - DOUGLAS POWLESS
248 EAST LANIKAULA ST
HILO, HI 96720-0000

I - DREW MARTIN
500 LAKE AVENUE # 102
LAKE WORTH, FL 33460-0000

I - DUANE VEON
6816-AWINI STREET
DIAMONDHEAD, MS 39525-3523

I - DUANE WICKLUND
23 SUNRISE TRL
FRUITLAND PARK, FL 34731-6469

I - DUSTIN CLARK
355 E TAYLOR AVE
SUNNYVALE, CA 94085-4336

I - DUSTIN WHITE
LADOTD
9800 JIMMY WEDDELL DRIVE
BATON ROUGE, LA 70807

I - DUSTIN WHITE
DESIGN ENGINEER
STATE OF LOUISIANA DOTD
P.O. BOX 94245
BATON ROUGE, LA 70804

I - DUSTY WASHBURN
6090 TERRY RD. #1208
JACKSONVILLE, FL 32216-4989

I - DWIGHT ADAMS
2507 NW 24 TERRACE
GAINESVILLE, FL 32605-0000

I - E SMITH
61 FAYETTE AVE
OAKDALE, PA 15071-1277

I - EBEN FUTRAL
150 EAGLE LN
SEDONA, AZ 86336-7131

I - ED KRAYNAK
1563 S ROSLYN ST
DENVER, CO 80231-2614

I - ED MCDADE
2581 S MOUNTAIN RD
PORT MATILDA, PA 16870-9222

I - ED PREAU
LADOTD
P.O. BOX 94245
BATON ROUGE, LA 70804-9245

I - ED QUIGLEY
110 RICKY DR
MUSCLE SHOALS, AL 35661-5426

I - ED SCERBO
3602 HOMESTEAD CT.
PEEKSKILL, NY 10566-0000

I - EDITH HANEY
626 GORDON DR. SE
DECATUR, AL 35601-0000

I - EDMOND LAREAU
281 4TH AV
REDWOOD CITY, CA 94063-3721

I - EDWARD DERY
1715 MAPLE ST
BETHLEHEM, PA 18017-5128

I - EDWARD HECK
7068 LANTANA LANE
TAMARAC, FL 33321-0000

I - EDWARD OLSON
590 COTTONWOOD ROAD
SEBASTIAN, FL 32958-3936

I - EDWARD SLANEY
2981 NOVA SCOTIA LANE
MELBOURNE, FL 32935-0000

I - EDWARD WALWORTH
8 MANNING AVE
LEWISTON, ME 04240-5921

I - EDWARD WAXMAN
3646 PLEASANT VALLEY RD
YORK, PA 17406-7035

I - EILEEN FRETZ
RR 6 BOX 6238B
STROUDSBURG, PA 18360-8542

I - EILEEN LUNDBERG
9850 SE VANDALIA DR
9850 SE VANDALIA DR, IA 50237-2075

I - EILEEN TRAINOR
503 PICASSO DR
SAN MARCOS, TX 78666-9531

I - EILZABETH UNGAR
101 W END AVE APT 28B
NEW YORK, NY 10023-6377

I - ELAINE FISCHER
2710 HOLLY HALL ST APT L
HOUSTON, TX 77054-4196

I - ELAINE HOWES
3705 PERDEW DR.
3705 PERDEW DR., FL 34538-0000

I - ELAINE MCCALL
2988 VINE CIR
DECATUR, GA 30033-5107

I - ELAINE SLOAN
10 MITCHELL PL
NEW YORK, NY 10017-1801

I - ELAINE YOUNG
7347 196TH STREET
FLUSHING, NY 11366-1810

I - ELDON FRANCIS
6609 MILANO COURT SOUTHEAST
OLYMPIA, WA 98513-4978

I - ELEANOR BECHER
39 RAINBOW TER
ORCHARD PARK, NY 14127-2516

I - ELEANOR BYERS
1058 FAIRBROOK CT
SAN JOSE, CA 95132-2911

I - ELEANOR CALTABIANO
950 CHESTERFIELD RD
HADDONFIELD, NJ 08033-3903

I - ELENA PEREZ
428 J ST STE 280
SACRAMENTO, CA 95814-2303

I - ELGIN LEE BAKER
819 N BUCKNELL ST
PHILADELPHIA, PA 19130-1919

I - ELIANA ARDILA
9880 SOUTHWEST 166TH COURT
MIAMI, FL 33196-5802

I - ELISABETH BRACKNEY
838 S LYNN ST
MOSCOW, ID 83843-3519

I - ELISE MALLOVE
999 GREENLEAF CANYON RD
TOPANGA, CA 90290-4112

I - ELIZABETH DANEL
339 GOLDEN GATE AVE
BELVEDERE, CA 94920-2483

I - ELIZABETH FLOWER
1245 N PALETHORP ST
PHILADELPHIA, PA 19122-4509

I - ELIZABETH MCSWEENEY
844 PLANDOME RD
MANHASSET, NY 11030-1302

I - ELIZABETH MIRANTI
926 S ELM ST
PALATINE, IL 60067-7106

I - ELIZABETH RAMSEY
1626 COLUSA AV
DAVIS, CA 95616-3131

I - ELIZABETH RUCH
700 MELROSE AVE J34
WINTERPARK, FL 32789-0000

I - ELIZABETH S. PUTNAM
PO BOX 717
DAYVILLE, CT 06241-0717

I - ELIZABETH SHULMAN
377 N. LAKE WAY
PALM BEACH, FL 33480-3639

I - ELIZABETH VIGIL
208 1900 CENTRE POINTE BLVD
TALLAHASSEE, FL 32308-0000

I - ELIZABETH WALKER
958 CHAMBERS SPRING RD
WAVERLY, TN 37185-2952

I - ELIZABETH ZIMMERMAN
7017 AMHERST AVE APT B
SAINT LOUIS, MO 63130-2331

I - ELLEN FOOSE
1004 LARCHMONT PLACE
MOUNT LAUREL, NJ 08054-0000

I - ELLEN JUSTICE
1221 N BAYSHORE DRIVE
VALPARAISO, FL 32580-1339

I - ELLEN MCNULTY
7809 CROSS RD
PINE BLUFF, AR 71603-9152

I - ELLEN PODOLSKY
83 ANDREWS ST.
MEDFORD, MA 02155-0000

I - ELLEN PODOLSKY
33 MAGOUN AVE
MEDFORD, MA 02155-4853

I - ELLEN WHITE
323 MONTGOMERY ST
HIGHLAND PARK, NJ 08904-2713

I - ELLYN SUTTON
PO BOX 18754
SPOKANE, WA 99228-0754

I - ELSY HADDAD
17294 37TH PLACE N
LOXAHATCHEE, FL 33470-3627

I - EMIL SCHELLER
1530 PALISADE AVE APT 18B
FORT LEE, NJ 07024-5401

I - EMILIA HERNANDO
ZAMAKOLA 130
BILBAO, ID 48003-0000

I - EMILY ALPERT
45 HOLLY LN
BROWNSVILLE, TX 78520-8320

I - EMILY BLOSS
17317 LAURA LEE DR #AUDUBON
SPRING HILL, FL 34610-0000

I - EMILY CURD
PO BOX 303
BELCHERTOWN, MA 01007-0303

I - EMILY LIU-ELIZABETH
4775 ATHERTON AVE APT 12
SAN JOSE, CA 95130-1015

I - EMILY WADDELL
618 N NOYES BLVD
SAINT JOSEPH, MO 64506-2811

I - ENID BREAKSTONE
164 WETHERELL ST
MANCHESTER, CT 06040-6408

I - ERIC D'ALESSANDRO
319 HURST ST.
BRIDGEPORT, PA 19405-0000

I - ERIC PRADELSKI
737 E 156TH ST
SOUTH HOLLAND, IL 60473-1520

I - ERIC SALINAS
13264 SW 50TH ST
HOLLYWOOD, FL 33027-5526

I - ERIC WELLS
1118 BRUSSELS ST
SAN FRANCISCO, CA 94134-2106

I - ERIC WEST
119 PINE TREE DRIVE
ORMOND BEACH, FL 32174-2644

I - ERICA ROYER
3110 HILLSVIEW RD
SPEARFISH, SD 57783-6013

I - ERICH W LARISCH
334 8TH ST NE
WASHINGTON, DC 20002-6108

I - ERIK HANEY
1015 14TH AVENUE N
SAINT PETERSBURG, FL 33705-1045

I - ERIK JANSSON
PO BOX 76
VALLEY LEE, MD 20692-0076

I - ERIKA SCULL
275 NORTHWEST 92ND AVENUE
CORAL SPRINGS, FL 33071-6916

I - ERNEST HARBEN
2380 MIDVALE CIR
TUCKER, GA 30084-4219

I - ESTELLA FRAZER
232 2ND ST
LEWES, DE 19958-1326

I - ESTER FUCHS
PO BOX 502
LAPEER, MI 48446-0502

I - ESTHER CASANOVAS
5900 NW 2ND ST.
MIAMI, FL 33126-0000

I - ESTHER FRANCES
941 SAMSONVILLE RD
KERHONKSON, NY 12446-1518

I - ETHEL LEIDER
5187 ROBINO CIRCLE
WEST PALM BEACH, FL 33417-3306

I - ETHEL TARANTINO
72 PARK AVE
FLEMINGTON, NJ 08822-1171

I - EUGENE DUMAS
244 BA WOOD LN
JANESVILLE, WI 53545-0705

I - EUGENE GORRIN
2607 FREDERICK TER
UNION, NJ 07083-5603

I - EUGENE PUMPHREY
1804 BAYVIEW AVE PO BOX 1000
BARNEGAT LGT, NJ 08006-1000

I - EVA HOFBERG
824 W 15TH ST TRLR 27
NEWPORT BEACH, CA 92663-6112

I - EVAN AND ELAINE HAZARD
3119 APPLETREE CT NW
BEMIDJI, MN 56601-2107

I - EVELYN & JAY JOSEPH
17 OAK BROOK LANE
MERRICK, NY 11566-3256

I - EVELYN BRANDT
15480 ADMIRALTY CIRCLE
NORTH FORT MYERS, FL 33917-3264

I - EVELYN DYMKOWSKI
2113 ROOSEVELT ST
CLINTON, IA 52732-2416

I - EVON RODGERS
16019 NE 145TH AVE
BRUSH PRAIRIE, WA 98606-3406

I - EZRA MANN
1273 S 9TH ST
LAS VEGAS, NV 89104-1524

I - F. CORR
128 E CHESTNUT HILL RD
MONTAGUE, MA 01351-9558

I - F. STANDEFORD
3686 JOHNSON LAKE RD
CEDARTOWN, GA 30125-5773

I - FAY HUANG
1612 75TH STREET NORTHWEST
BRADENTON, FL 34209-1069

I - FAY STONE
2099 FOUNTAIN BLUFF LN
PLATTEVILLE, WI 53818-9502

I - FELICITY DORSETT
2701 SPRING ST
FORT WAYNE, IN 46808-3939

I - FLORENCE KRYCH
214 E TRAUBE AVE
WESTMONT, IL 60559-1543

I - FLORENCE SULLIVAN
4911 N CENTRAL AVE
CHICAGO, IL 60630-2031

I - FLORENCE THOMPSON
3 SUTTON PL APT 14
CINCINNATI, OH 45230-1343

I - FOREST BURKS
6249 SORTER ROAD
GUNTERSVILLE, AL 35976-2931

I - FOREST SHOMER
PO BOX 639
PORT TOWNSEND, WA 98368-0639

I - FRANCES & SUMNER PATCH
7112 SYCAMORE AVE
TAKOMA PARK, MD 20912-4639

I - FRANCES CHRISTEN
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I - FRANCES CONE
183 BOBCAT DR
PAWLEYS ISLAND, SC 29585-7526

I - FRANCES CONE
909 8TH AVENUE SW
RUSKIN, FL 33570-4515

I - FRANCES DUGGAN
102 ILFORD AVE
NORTH ARLINGTON, NJ 07031-5916

I - FRANCES FREITAG
1610 S 11TH ST
SHEBOYGAN, WI 53081-0000

I - FRANCES HODGES
PO BOX 1764
DAVIDSON, NC 28036-0000

I - FRANCES STEWART
3309 NOYES AVE
CHARLESTON, WV 25304-1320

I - FRANCES TAN
2300 W 26TH ST APT E30
LAWRENCE, KS 66047-3137

I - FRANCISCO COSTA
67665 ONTINA RD
CATHEDRAL CITY, CA 92234-5545

I - FRANK BELCASTRO
285 N GRANDVIEW AVENUE
DUBUQUE, IA 52001-6327

I - FRANK BROWN
4648 WILLOW RD PO BOX 293
PINE LAKE, GA 30072-0000

I - FRANK COLLETTO
4207 GERTRUDE STREET
SIMI VALLEY, CA 93063-2927

I - FRANK FISCHER
123 WALNUT STREET, APT #702
NEW ORLEANS, LA 70118-4845

I - FRANK MASTRI
PO BOX 10
BRIDGEPORT, CT 06601-0010

I - FRANK MILLIN
2637 E. ATLANTIC BLVD
POMPANO BEACH, FL 33062-0000

I - FRANK X. KLESHINSKI
209 NORTH DR
JEANNETTE, PA 15644-9629

I - FRANKLIN PLATIZKY
3117 CEDAR HL
DENTON, TX 76209-8350

I - FRED FALL
106 UXBRIDGE
CHERRY HILL, NJ 08034-3724

I - FRED HAY
261 EASTVIEW DR
BOONE, NC 28607-3660

I - FRED KINKAID
PO BOX 198
CHARLOTTE, IA 52731-0198

I - FREDERIC GRIEST
6944 E VILLANOVA PL
DENVER, CO 80224-2648

I - FREDERIC MICHALSKI
27 PLACE CHAPOU
CAHORS, 46000-0000

I - FREDERICK BRENNER
12700 SW 69TH AVE
MIAMI, FL 33156-6221

I - G. A. HOWARD
10 SHERIDAN SQUARE APARTMENT 4D
NEW YORK, NY 10014-0000

I - G. WINTERS
113 E 3RD ST
NEWKIRK, OK 74647-1204

I - G.C. JANETT
730 W OAK ST
FORT COLLINS, CO 80521-2512

I - GABRIELA SEOANE
557 E WALNUT ST
LONG BEACH, NY 11561-3737

I - GABRIELLE LYNCH
7612 HUEY COURT
RALEIGH, NC 27615-5025

I - GAIL LEWIS
47 RAINBOW RDG
IRVINE, CA 92603-3728

I - GAIL MC MAHON
1702 14TH TER S
BIRMINGHAM, AL 35205-6265

I - GAIL RAINS
PO BOX 662022
SACRAMENTO, CA 95866-2022

I - GAILE CARR
1821 EDDY DR
MOUNT SHASTA, CA 96067-9617

I - GARETH WYNN
122 BAG END RD
HENDERSONVILLE, NC 28739-2286

I - GARY BEARD
8522 FAIRBURN DR
SPRINGFIELD, VA 22152-3224

I - GARY KINKLEY
3 CLARK RD
ANNVILLE, PA 17003-9540

I - GARY LEGG
979 ALPINE WAY
INDIAN SPRINGS, AL 35124-0000

I - GARY LUDI
2035 AZALEA DR
ROSWELL, GA 30075-4750

I - GARY MIERAU
1766 HOLLY ST
DENVER, CO 80220-1445

I - GARY MONTOYA
875 WEST 9TH ST.
TRUTH OR CONSEQUENCES, NM 87901-

I - GARY NEU
11868 S GATE RD
ROSCOE, IL 61073-9674

I - GARY ROULSTON
1150 S LEFEVER DR
LITITZ, PA 17543-9373

I - GEOFFREY PRUITT
2344 BLUE HERON DR
FLORISSANT, MO 63031-5505

I - GEORGE BODDIE
LNNR/ COASTAL ENGINEERING
2045 LAKESHORE DR, STE. 309, CERM
NEW ORLEANS, LA 70122

I - GEORGE CHIANESE
4902 BRISTLE CONE CIR
ABERDEEN, MD 21001-2604

I - GEORGE MAHR
9020 SOUTHEAST YACHT CLUB CI
HOBE SOUND, FL 33455-0000

I - GEORGE OLLEN
4926 O SULLIVAN DR
LOS ANGELES, CA 90032-4021

I - GEORGE ROBINSON
116 PINEHURST AVE
NEW YORK, NY 10033-1755

I - GEORGE SEAMAN
PO BOX 242
PRESCOTT, AZ 86302-0242

I - GEORGE TOLLESON
26 CHATEAU PL
ASHEVILLE, NC 28805-1713

I - GEORGE WILDER
990 8TH ST S
NAPLES, FL 34102-8215

I - GEORGIA MATTINGLY
412 VERDANT CIR
LONGMONT, CO 80501-3908

I - GERALD BROOKMAN
715 MUIR AVENUE
KENAI, AK 99611-8816

I - GERALD FISHER
432 GRASSLAND CT
BLUFFTON, IN 46714-9277

I - GERALD LAIRD
65 ENFIELD RD
LINCOLN, ME 04457-1171

I - GERALD ORCHOLSKI
2400 BRIGDEN RD
PASADENA, CA 91104-3427

I - GERALDINE BASSETT
916 POLK ST
HOLLYWOOD, FL 33019-0000

I - GERI LAWRENCE
3 LOOKOUT TRL
WESTPORT, CT 06880-5143

I - GEROLYN JENKINS
10697 OAK BEND WAY
WELLINGTON, FL 33414-6175

I - GERRI REAVES
16442 TIMBERLAKES DR #204
FORT MYERS, FL 33908-0000

I - GERRY KNAM
7547 SOUTHEAST BAY CEDAR CIRCLE
HOBE SOUND, FL 33455-7877

I - GERRY MILLIKEN
PO BOX 1880
OROVILLE, WA 98844-1880

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222 E 87TH ST
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I - GINA SALAZAR
516 W 91ST CIR
DENVER, CO 80260-6894

I - GINA VENTOLA
8617 PARK HIGHLAND DRIVE
ORLANDO, FL 32818-5773

I - GINGER IGLESIAS
5428 EVELYN WAY
LIVERMORE, CA 94550-2325

I - GINNY & BOB FREEMAN
2650 PORTLAND ST
EUGENE, OR 97405-3129

I - GIOVANNI MASTRACCHIO
169 CHURCH ST
WHITE PLAINS, NY 10601-1210

I - GLEN BANKS
PO BOX 333
PLACITAS, NM 87043-0333

I - GORDON BARRETT
13591 BEAUMONT AVENUE
SARATOGA, CA 95070-0000

I - GORDON SCHOCHET
89 GEORGE STREET
89 GEORGE STREET, NJ 08903-0000

I - GORDON SHEILL
4291 EASTGATE DRIVE
ANN ARBOR, MI 48103-9412

I - GRACE BURSON
160 NICOLL ST
NEW HAVEN, CT 06511-2624

I - GRACE TRUAX
2303 GREGG RD SW
SOUTH BOARDMAN, MI 49680-9647

I - GREG DINNSEN
9012 WAGGONEER CIR
CHARLOTTE, NC 28270-0844

I - GREG JACKSON
2220 BANEBERRY DRIVE
BIRMINGHAM, AL 35244-1403

I - GREG RITTCHEN
278 MUNGERTOWN RD
MADISON, CT 06443-1933

I - GREG SCHNEIDER
540 EDGAR RD
WESTFIELD, NJ 07090-4119

I - GREG SWICK
1503 E BINGHAM ST
OZARK, MO 65721-9503

I - GREG WILSON
861 BALLSTOWN RD
LITITZ, PA 17543-8551

I - GREGG ROGERS
1752 SW OLD WIRE ROAD
LAKE CITY, FL 32024-0000

I - GREGORY ESTEVE
3655 N SCENIC HIGHWAY
LAKE WALES, FL 33898-6608

I - GREGORY J HARBER
2906 HIGHLAND AVENUE S APT. 5
BIRMINGHAM, AL 35205-1911

I - GREGORY TAYLOR
13086 52ND CT N
ROYAL PALM BEACH, FL 33411-0000

I - GRETCHEN HART-VONKELLER
306 S ANIMAS ST
TRINIDAD, CO 81082-3231

I - GRISELDA SLOAN
118 LEDGERWOOD LN
ROCKWOOD, TN 37854-5714

I - GUNN HONICAN
316_LAKEVIEW LN
WINTER HAVEN, FL 33884-2630

I - GUNTER WENDLAND
7985 SW 187TH AVE
DUNNELLON, FL 34432-2424

I - GUY WINIG
2766 NY ROUTE 23 PO BOX 780
HILLSDALE, NY 12529-0780

I - GUY ZAHLLER
146 CREEK DR UNIT C
APTOS, CA 95003-4577

I - GWYNNETH BAUER
8410 N PINEWOOD DR
CASTLE ROCK, CO 80108-9247

I - HANITA ROSENBOIM
17 CLOVER DR
GREAT NECK, NY 11021-1029

I - HAROLD A SAMUELS
5659 RAMARA AVE
WOODLAND HILLS, CA 91367-4057

I - HAROLD BOSWELL
4614 3RD AVE NW
SEATTLE, WA 98107-4405

I - HAROLD PIGGOTT
211 N MERIDIAN RD
GLEN CARBON, IL 62034-1333

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703 RIVERVIEW AVE
TEANECK, NJ 07666-2268

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PO BOX 86
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RONKONKOMA, NY 11779-5926

I - HARRIET HIRSCH
1903 MEMORY CT
VIENNA, VA 22182-3327

I - HARRIET JERNQUIST
195 MAIN ST APT 5C
MILLBURN, NJ 07041-1153

I - HARRIET MCCLEARY
2440 STEVENS AVE # 2
MINNEAPOLIS, MN 55404-3529

I - HARRIETTE FRANK
3603 WESTOVER RD
DURHAM, NC 27707-5032

I - HARRISON HILBERT
PO BOX 714
POCATELLO, ID 83204-0714

I - HARVEY BUCHBINDER
2301 EL CONTENTO DR BLDG 34
LOS ANGELES, CA 90068-2815

I - HEATHER CROSS
18500 GARFIELD
REDFORD, MI 48240-1716

I - HEATHER DUPUY
2015 S OSCEOLA AVE
ORLANDO, FL 32806-4036

I - HEATHER HALVORSON
1213 GILSON ST # 2F
MADISON, WI 53715-2119

I - HEATHER LANDIS
7425 DAKOTA AVE
CHESAPEAKE BEACH, MD 20732-9335

I - HEATHER PENNINGTON
546 SHOTWELL ST
SAN FRANCISCO, CA 94110-1916

I - HEATHER TUCKER
201 W SOUTHWEST PKWY APT 10112
LEWISVILLE, TX 75067-7738

I - HEIDI HARTMAN
72097 HWY 74
IONE, OR 97843-0000

I - HEIDI SMITH
10723 EDITH BLVD NE
ALBUQUERQUE, NM 87113-2503

I - HEIDI WELTE
18880 SW HART RD
BEAVERTON, OR 97007-5623

I - HELAINE MOYSE
2974 REYMOND
BATON ROUGE, LA 70808-1575

I - HELEN GREER
1170 W WABASH ST LOT 32
TUCSON, AZ 85705-1465

I - HELEN KOPP
12521 INDIAN HOLLOW RD
GRAFTON, OH 44044-9190

I - HELEN MALINAUSKAS
W2702 FOX LN
MONTELLO, WI 53949-9027

I - HELEN SCOTT
210 WALNUT AVENUE NORTHWEST
PORT CHARLOTTE, FL 33952-7945

I - HELEN TORRES
5624 SOUTHWEST 60TH AVENUE
MIAMI, FL 33143-2232

I - HELEN WARBINGTON
3814 N ALASKA ST
PORTLAND, OR 97217-7306

I - HELEN WARNICK
2830 ARMADILLO TRL
TITUSVILLE, FL 32780-0000

I - HELGA SABLE
1105 WHITEHALL AVE.
TAHOE VISTA, CA 96148-0000

I - HENRY MITCHELL
94 CENTER POINT RD
BOWDOINHAM, ME 04008-4825

I - HENRY MULLER
265 VILLA DEL MAR WAY
SATELLITE BEACH, FL 32937-3448

I - HENRY SMOKE
130 HAGUE DR
COLUMBUS, NC 28722-6412

I - HETY BROST
1613B
MEDANALES, NM 87548-0091

I - HILARY HOTT
PO BOX 88
AUGUSTA, WV 26704-0088

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1900 RED OAK WAY NW
KENNESAW, GA 30152-3312

I - HOLLY CHISHOLM
183 ORA RD
OXFORD, MI 48371-3229

I - HOLLY EATON
12407 SHADOWVISTA DR
HOUSTON, TX 77082-7308

I - HOLLY MOORE
1454 SEMINOLE ST
MOUNT PLEASANT, SC 29464-4825

I - HOPE ASHLEY
312 ELM ST
PALO ALTO, CA 90210-4916

I - HOPE SHEPPARD
319 E KIMBROUGH ST
MESQUITE, TX 75149-4401

I - HOWARD HOLDEN
204 BARRY ST
DECATUR, GA 30030-3424

I - HOWARD STEFFENS
11023 TUJUNGA CANYON BLVD
TUJUNGA, CA 91042-1243

I - HOWARD WOO
7748 HOSFORD AVE
LOS ANGELES, CA 90045-1145

I - HUGH CAROLA
30 MAPLE AVE
HACKENSACK, NJ 07601-4502

I - HYGI WAETERMANS
303 BLAZING STAR CT
WINDSOR, CA 95492-8615

I - I GAC
424 BROOKVIEW DR
ROCHESTER, NY 14617-4313

I - IAN NOAH
939 S. DUNSMUIR AVE
LOS ANGELES, CA 90230-7529

I - IAN NOAH
5109 SHOWBOAT LN
CULVER CITY, CA 90230-7529

I - IAN SHELLEY
9158 SW WILSHIRE ST
PORTLAND, OR 97225-4058

I - IKE WENNIHAN
PO BOX 1446
DOLORES, CO 81323-1446

I - INGRID STEPHEN
11646 SIR WINSTON WAY
ORLANDO, FL 32824-6008

I - INTERNATURAL ALINEMENT
PO BOX 641
WOOD RIVER, IL 62095-0641

I - IRENE ABBOTT
1902 NEW BEDFORD DR.
SUN CITY CENTER, FL 33573-6101

I - IRENE DRISS
629 CAROLINE ST APT 4
KEY WEST, FL 33040-6650

I - IRVING SPOKONY
PO BOX 201
LAKE ALFRED, FL 33850-0201

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161 W 61ST ST #20C
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I - ISAAC LUDWIG
16669 STEUBENVILLE PIKE
SALINEVILLE, OH 43945-9735

I - J. CAPOZZELLI
315 W 90TH ST
NEW YORK, NY 10024-1646

I - J. HOLLEY TAYLOR
5745 SW 75TH ST # 362
GAINESVILLE, FL 32608-5504

I - J. PERRYMAN
95 CLIFTON DR
DALY CITY, CA 94015-3436

I - J. STEPHEN ADAMS
646 LEONARD ST APT 1R
BROOKLYN, NY 11222-2950

I - J.B. COLEMAN
201 GINGER LN
EASLEY, SC 29642-1319

I - J.B. SCHWALLER, P.E.
2550 EVERGREEN ROAD
MINDEN, LA 71055-6081

I - JACK BALCH
3303 CUSTER AVENUE
LAKE WORTH, FL 33467-1003

I - JACK BROWN
334 3RD AVE N
PAYETTE, ID 83661-2308

I - JACK M. HIRSHON
P.O. BOX 3845
HOLIDAY, FL 34692-0000

I - JACK SAYLOR
4933 YORK RD
SOUTH BEND, IN 46614-3442

I - JACK STEINBERG
3506 WEST AZEELE STREET APT. 109
TAMPA, FL 33609-2947

I - JACK STEVENS
1158 26TH STREET #333
SANTA MONICA, CA 90403-0000

I - JACKIE MILLER
632 BRECKENRIDGE ST UPPR
BUFFALO, NY 14222-1508

I - JACKIE SEMIT
23 DAYTON PLACE
HERKIMER, NY 13350-1030

I - JACKIE TUCKER
13430 SUMMER RAIN DR.
ORLANDO, FL 32828-0000

I - JACKIE YUNG
590 W HILLS WAY NW
SALEM, OR 97304-4327

I - JACQUELINE SCOTT
553 HAWKINS CIRCLE
APOPKA, FL 32703-3323

I - JACUQELYN SMITHERS
2906 SHARON DR
ANN ARBOR, MI 48108-1861

I - JAIME HISEL
236 N WOOD ST
SPRING GREEN, WI 53588-9236

I - JAMES & GINA ROSS
3116 PLAZA DR NE APT C7
GRAND RAPIDS, MI 49525-2931

I - JAMES AND ELLEN HURST
7207 LUNAR DR
AUSTIN, TX 78745-6454

I - JAMES CARPENTER
1831 BLAKE ST
BERKELEY, CA 94703-1903

I - JAMES DENISON
6931 E 11TH ST
LONG BEACH, CA 90815-4937

I - JAMES EVANS
PO BOX 994
CLEARLAKE OAKS, CA 95423-0994

I - JAMES GEYER
6162 MCCUE RD
HOLT, MI 48842-9658

I - JAMES GILLAND
1600 N WILMOT RD UNIT 130
TUCSON, AZ 85712-4415

I - JAMES H JORGENSEN
4207 WESTBROOK DR
AMES, IA 50014-3472

I - JAMES KIRKS
11 HEMMING LANE
CHICO, CA 95973-1076

I - JAMES MARTIN
16039 S LEXINGTON DR
PLAINFIELD, IL 60586-8026

I - JAMES MCCARTHY
3972 LORA STREET
FORT MYERS, FL 33916-1316

I - JAMES MORMAN
26 PEVETTY DR
EAST HAVEN, CT 06512-4815

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PO BOX 16743
GOLDEN, CO 80402-6012

I - JAMES MOSS
7000 MONUMENT DR # A
GRANTS PASS, OR 97526-8516

I - JAMES MURPHY
MARAD
500 POYDRAS STREET, #1223
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I - JAMES R. HILL
13258 UNION ROAD
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GOLDEN VALLEY, MN 55422-4233

I - JAMES TORNATORE
4881 VERMILION DR
SAINT LOUIS, MO 63128-2353

I - JAMES WELMS
2601 BRADWELL CT
PARKVILLE, MD 21234-1518

I - JAMES WILDER
10 MANHATTAN SQUARE DRIVE APT 6E
ROCHESTER, NY 14607-3951

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2480 16TH ST NW APT 843
WASHINGTON, DC 20009-6707

I - JAN BROWN
2626 SHRIVER DRIVE
FORT MYERS, FL 33901-5836

I - JAN NOVOTNY
401 15TH AVENUE N
401 15TH AVENUE N, FL 32250-4710

I - JAN RAHM
1073 MADISON ST
DENVER, CO 80206-3435

I - JANE BOREN
9911 GERONIMO DRIVE
NORMAN, OK 73026-5919

I - JANE BRYANT
214 ASHMORE BRIDGE RD
MAULDIN, SC 29662-2841

I - JANE CHISCHILLY
420A TOMBSTONE CANYON
BISBEE, AZ 85603-2285

I - JANE CHISCHILLY
2017 CIR. 4114
ATLANTA, TX 75551-0000

I - JANE CONE
909 8TH AVENUE SW
RUSKIN, FL 33570-4515

I - JANE MACCRI
207 GRANADA BLVD.
207 GRANADA BLVD., FL 33905-0000

I - JANE MCRAE
63 BAGDAD RD
DURHAM, NH 03824-3220

I - JANE O'CONNOR
817 FAY ROAD APT# 07
SYRACUSE, NY 13219-0000

I - JANE VALERY
10 BROOKVIEW DRIVE
ATCO, NJ 08004-2930

I - JANE WINN
27 HIGHLAND AVE
PITTSFIELD, MA 01201-0000

I - JANET BARBER
5583 NEWLAND RD
PARADISE, CA 95969-5224

I - JANET CLEMENSON
3130 E. WEBBER DR.
PEARLAND, TX 77584-0000

I - JANET FOTOS
26 TRUELL RD
HOLLIS, NH 03049-6271

I - JANET HALLE
311 GERMAN STREET
WEST NEWTON, PA 15089-1215

I - JANET PEITAVINO
156 CORNELL ST
NEW BEDFORD, MA 02740-1714

I - JANET RAFFERTY
407 MYRTLE ST
STARKVILLE, MS 39759-2607

I - JANET SEARS
1632 POWDER RIDGE DR
PALM HARBOR, FL 34683-4844

I - JANET WEISBERG
820 MEADOWLAND DR APT J
NAPLES, FL 34108-2546

I - JANET WILLIAMS
1200 DON GASPAR AVE
SANTA FE, NM 87505-0626

I - JANET ZEHR
971 SWEENEY ST
NORTH TONAWANDA, NY 14120-4807

I - JANICE BORDELON
1121 E. WINDWOOD WAY
1121 E. WINDWOOD WAY, FL 32311-0000

I - JANICE BURGI
950 DANIEL ST
SUN PRAIRIE, WI 53590-1031

I - JANICE DLUGOSZ
409 COMPASS AVENUE
BEACHWOOD, NJ 08722-4119

I - JANICE FOSS
622 RICHMOND ST
EL CERRITO, CA 94530-3213

I - JANICE GLOE
3100 GUIDO ST
OAKLAND, CA 94602-3521

I - JARIAN WESTFALL
8623 EVERGLADE DR
SACRAMENTO, CA 95826-3618

I - JASON BERRY
3206 23RD ST N
ARLINGTON, VA 22201-4309

I - JASON HAMPTON
107 THORAIN
SAN ANTONIO, TX 78212-0000

I - JASON J GREEN
4 RICK CT
FREDERICKSBURG, VA 22407-0000

I - JASON TILLEY
1217 27TH ST
GULFPORT, MS 39501-5222

I - JAY BEYERSDORF
13407 106TH AVENUE
LARGO, FL 33774-5515

I - JAY DRAKE
1536 GREAT HWY APT 31
SAN FRANCISCO, CA 94122-2815

I - JAY GASSMAN
1919 MIDDLE COUNTRY RD
CENTEREACH, NY 11720-5600

I - JAY HUMPHREY
2373 NW 185TH AVE # 195
HILLSBORO, OR 97124-7076

I - JAY ROZNER
74 VENTNOR D
DEERFIELD BEACH, FL 33442-2445

I - JAYNE REED
450 S FORK RD
GARDEN VALLEY, ID 83622-1028

I - JC FINCH
299 ALLEN HOLLOW ROAD
COOKEVILLE, TN 38501-5774

I - JEAN JENKS
250 HILLSIDE AVENUE
SEDONA, AZ 86336-4136

I - JEAN LEWANDOWSKI
35485 COUNTY 39
LAPORTE, MN 56461-4049

I - JEAN WOODMAN
1501 ASHLAND AVE
EVANSTON, IL 60201-4089

I - JEANETTE HOBBS
11399 OVERSEAS HGWY, SUITE 4E
MARATHON, FL 33050-0000

I - JEANIE WILLIAMS-WEST
956 WYLIE
BATON ROUGE, LA 70808-5885

I - JEANINE ISHII
752 N LIVERMORE AVE APT 201
LIVERMORE, CA 94551-4392

I - JEANNE MORLON
8648 CLUB ESTATES WAY
LAKE WORTH, FL 33467-0000

I - JEANNE PANELL
27839 21ST ST
HIGHLAND, CA 92346-2646

I - JEANNE PLACE
204 N MACKINAW RD
LINWOOD, MI 48634-9444

I - JEANNE RUBENSTEIN
9937 ROSIER CREEK WAY
GLEN ALLEN, VA 23060-0000

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NEW PORT RICHEY, FL 34654-2602

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908 WOOTTON RD
BRYN MAWR, PA 19010-2228

I - JEFFREY DUBINSKY
16944 APACHE DRIVE
GREENWELL SPRINGS, LA 70739-6201

I - JEFFREY STREED
1200 N QUAKER LN
ALEXANDRIA, VA 22302-3004

I - JEFFREY WILES
921 11TH AVE S APT 3
HOPKINS, MN 55343-7941

I - JEFFREY WOMBLE
11277 N HIGHWAY 99
LODI, CA 95240-6810

I - JEN ECKER
8740 MANAHAN DR
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I - JENNA RYTINA
106 TROUT CREEK CT
LAS VEGAS, NV 89123-3456

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SOUTHBURY, CT 06488-1952

I - KATHY KUYPER
PO BOX 764
GRAND JUNCTION, CO 81502-0764

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19347 LINDEN STREET
SONOMA, CA 95476-6347

I - KATHY RUOPP
9631 S VANDERPOEL AVE
9631 S VANDERPOEL AVE, IL 60643-1229

I - KATHY SHIMATA
3453 PAWAINA ST.
HONOLULU, HI 96822-1356

I - KATY FLANAGAN
2001 CANAL ST
BOISE, ID 83705-4822

I - KAY FREEMAN
520 RICHBURG ROAD
PURVIS, MS 39475-3318

I - KAY GALLIN
10364 ALMAYO AVE
LOS ANGELES, CA 90064-2680

I - KAY PAUL
2507 1ST ST, APT E
IND RKS BCH, FL 33785-0000

I - KAY SHRADER
PO BOX 511
BIG BEND, WI 53103-0000

I - KAY YEUELL
220 WHITE OAK CIRCLE
MAITLAND, FL 32751-0000

I - KEITH GAGOMIROS
821 F ST
SACRAMENTO, CA 95814-1305

I - KEITH KOLISCHAK
133 QUEENSBURY RD
WINSTON SALEM, NC 27104-3537

I - KEITH TEETER
604 ESSEX PLACE
EULESS, TX 76039-0000

I - KELLE PEEPLEZ
255 CARRIAGE CIRCLE DR APT 206
PONTIAC, MI 48342-3367

I - KELLEY UPDIKE
2041 WHITNEY NICOLE LN
JACKSONVILLE, FL 32216-3189

I - KELLY DREY-HOUCK
921 WHITE AVE
MULLENS, WV 25882-1544

I - KELLY GARBATO
19400 MISSION ROAD
STILWELL, KS 66085-9117

I - KELLY KARKI
15 NEW SUDBURY ST RM 1375
BOSTON, MA 02203-0000

I - KELLY LYON
2415 ANDREW DR
SUPERIOR, CO 80027-8202

I - KELLY O'DONNELL
511 S EL MOLINO AVE APT 16
PASADENA, CA 91101-4205

I - KELLY REICE
329 KENILWORTH AVE
MOORESTOWN, NJ 08057-2317

I - KELLY RILEY
704 ALISON AVE
MECHANICSBURG, PA 17055-6652

I - KELLY TVEIT
447 BRIDALWOOD DR
MANDEVILLE, LA 70448-0000

I - KEN AND VAL HANSEN
2200 S 29TH ST APT 54N
GRAND FORKS, ND 58201-5837

I - KEN DUFFY
BEM SYSTEMS, INC.
8550 UNITED PLAZA, SUITE 702
BATON ROUGE, LA 70809

I - KEN DUNCAN
5000 E RIDGE DR S
FORT COLLINS, CO 80526-4620

I - KEN ODINET
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I - KENNETH BIRD
131 ARAGON AVE
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I - KENNETH BOWMAN
2838 RIVERS END RD
ORLANDO, FL 32817-2949

I - KENNETH CAROLUS
447 CHERRY DR
DAYTON, OH 45405-3011

I - KENNETH LINN
7 ELGIN PL. - 711
DUNEDIN, FL 34698-0000

I - KENNETH PAYNE
10817 NELLE AVE NE
ALBUQUERQUE, NM 87111-3940

I - KENT STROBEL
1041 SINCLAIR DR
STOWE, VT 05672-4156

I - KERMIT CUFF, JR.
338 MARIPOSA AVE APT 2
MOUNTAIN VIEW, CA 94041-1160

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I - KEVIN CLARK
850 POINTE PACIFIC APT 1
DALY CITY, CA 94014-3409

I - KEVIN CLIFFORD
8718 0RCHID DR
SEMINOLE, FL 33777-0000

I - KEVIN HOBAN
126 E ACAPULCO DR
SOUTH PADRE ISLAND, TX 78597-7017

I - KEVIN MERWIN
2329 W 35TH PL # 9
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I - KEVIN MUELLER
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STATE COLLEGE, PA 16803-3028

I - KEVIN MURPHY
1055 S AVON RD
DEARY, ID 83823-9637

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MIAMI BEACH, FL 33140-1673

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LANCASTER, CA 93535-3025

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PO BOX 1117
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WYANDOTTE, MI 48192-2410

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I - KIMBERLY LOWE
612 SYCAMORE MILL DR
GAHANNA, OH 43230-2262

I - KIMBERLY MILLER
1170 PENHURST DR
FLORISSANT, MO 63033-6038

I - KIMBERLY PETERSON
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CLOVERDALE, CA 95425-3762

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I - KIRK RHOADS
301 COOPER ST
MOUNTAIN HOME, AR 72653-4270

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720 CHERRY STREET
PANAMA CITY, FL 32401-3854

I - KIRSTIN LITCHFIELD
3118 SE 8TH AVE
PORTLAND, OR 97202-2505

I - KIRSTIN WRIGHT
6259 HAMPTON DR. N
SAINT PETERSBURG, FL 33710-4833

I - KONSTANZE HICKEY
404 WOODLEY WOODS
WINNETKA, IL 60093-3720

I - KRISTEN DRESSLER
33 SOUTH RONKS ROAD
RONKS, PA 17572-0000

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LEHIGH ACRES, FL 33936-4816

I - KRISTINE DEMPZE
1121 16TH ST N
WISC RAPIDS, WI 54494-3038

I - KYLE GRACEY
201 NADONA AVE
JOHNSTOWN, PA 15904-2417

I - KYLE TUCKER
RR 1 # 54
ORONOGO, MO 64855-9801

I - L. M. DRUCKER
6546 HALEY DR
COLUMBIA, SC 29206-1015

I - L. MOJICA
9236 TRUE AVE
DOWNEY, CA 90240-2547

I - L.D. STROH
CG SECTOR NEW ORLEANS
U.S. COAST GUARD
201 HAMMOND HIGHWAY
METAIRIE, LA 70005

I - LACEE GONZALEZ
5238 EL CLARO CIRCLE
WEST PALM BEACH, FL 33415-0000

I - LANA SCHAFFER
1458 UPPER AFTON RD
SAINT PAUL, MN 55106-6835

I - LARA COMPTON
611 WESTVIEW TERRACE CIR
SEALY, TX 77474-3116

I - LARRY DENNIS
35170 GARCIA ST
UNION CITY, CA 94587-5206

I - LARRY LAITNER
801 PINECREST TER
ASHLAND, OR 97520-3460

I - LARRY LYONS
1714 N ROSE ST
BURBANK, CA 91505-1712

I - LARRY MIX
106 CAMELLIA DR
LEESBURG, FL 34788-0000

I - LAURA BILGER
8120 COUNTY BRIDGE RD
SLATINGTON, PA 18080-3663

I - LAURA FELTON
1709 VINEYARD DR #6
WILSON, NC 27893-0000

I - LAURA GEIGER
202 12TH ST SE
AUBURN, WA 98002-6647

I - LAURA HERNDON
125 N BRIGHTON ST APT 231
BURBANK, CA 91506-2356

I - LAURA HUDDLESTONE
5222 18TH AVE SW
SEATTLE, WA 98106-1549

I - LAURA KRACUM
1555 N ASTOR ST APT 41E
CHICAGO, IL 60610-5783

I - LAURA KREBS
517 HALFMOON ST
BELLEFONTE, PA 16823-1211

I - LAURA MCKEE
9582 TORTOISE LANE
MICCO, FL 32976-3329

I - LAURA PHILLIPS
635 PARK DR
OXFORD, MS 38655-2824

I - LAURA SAUNDERS
65 HIGHLAND AVE
FITCHBURG, MA 01420-0000

I - LAURA SHOLTZ
384 FOGLER RD
EXETER, ME 04435-3409

I - LAUREL COVINGTON
207 ORANGE DR
LUTZ, FL 33548-0000

I - LAUREL ECKERT
4801 ROANOKE PKWY APT 506
KANSAS CITY, MO 64112-0000

I - LAUREN CHIONG
8 CRUM LEDGE LN
SWARTHMORE, PA 19081-1301

I - LAURI PEACOCK
718 N. BURK
HOBBS, NM 88240-4936

I - LAURIE BERINGER
22455 LAKE RD
ROCKY RIVER, OH 44116-1056

I - LAURIE BROWN
3861 MISTY BLEAU DR
POWDER SPRINGS, GA 30127-2351

I - LAURIE MCLAUGHLIN
4075 HILLDALE RD
SAN DIEGO, CA 92116-2015

I - LAURIE MEYER
221 NE FREMONT ST APT 107
PORTLAND, OR 97212-2066

I - LAURIE SUDOL
580 ANTELOPE DR
CLARKDALE, AZ 86324-3612

I - LAURIE ZALESKI
9612 KINO ST
DIAMONDHEAD, MS 39525-0000

I - LAWRASON CLEMENT
106 1ST ST E APT 111
TIERRA VERDE, FL 33715-0000

I - LAWRENCE CROWLEY
441 PHEASANT RUN
LOUISVILLE, CO 80027-1141

I - LAWRENCE FISCHMAN
153 PARK ROW STE B
BRUNSWICK, ME 04011-2053

I - LAWRENCE RICHARDS
2451 PALESTA DR
TRINITY, FL 34655-5160

I - LAWRENCE TOUSH
132 W MAIN PO BOX 368
MARCELLUS, MI 49067-0368

I - LAWRENCE TURNER
214 S SAN JOSE DR
GLENDORA, CA 91741-3732

I - LAWRENCE WARNER
68 MONTROSE DR PO BOX 896
FISHERSVILLE, VA 22939-0896

I - LEANN MUNSON
11024 GREENAIRE DRIVE
TAMPA, FL 33624-4881

I - LEE & CHARLOTTE TERBOT
327 CURIA CREEK LN
CAVE CITY, AR 72521-9084

I - LEE & GEORGE HAINES
8 BARBERRY LANE
MADISON, CT 06443-3241

I - LEE BASNAR
1900 E KACHINA TRL
SIERRA VISTA, AZ 85650-8703

I - LEE FRANK
14648 TUSTIN ST
SHERMAN OAKS, CA 91403-4103

I - LEE GIBSON
5924 E UNIVERSITY BLVD APT 209
DALLAS, TX 75206-4665

I - LEE PETTENGER
21 DIAMOND J ROAD
SEIAD VALLEY, CA 96086-0675

I - LEE SUTTON
231 LILAC ST
RIDGECREST, CA 93555-0000

I - LEIGH SAVOYE
20 ONDAORA PKWY
HIGHLAND FALLS, NY 10928-4011

I - LEIGHANNE BOONE
12929 WATER POINT BLVD
WINDERMERE, FL 34786-0000

I - LEO RICHARDSON
107 STELLA STREET
METAIRIE, LA 70005

I - LEON BIGGS
9317 W SR 114
RENSSELAER, IN 47978-0000

I - LEON HAMMER
8620 NW 13TH ST #216
GAINESVILLE, FL 32653-0000

I - LEONARD CONLY
1252 GILMAN ST
BERKELEY, CA 94706-2353

I - LEONARD HESS
316 OLD DISTILLERY RD
STAHLSTOWN, PA 15687-1100

I - LESA HANSON
845 LAKELAND AVE.
NAPLES, FL 34110-1319

I - LESLEY HUNT
236 WARWICK DR
WALNUT CREEK, CA 94598-3213

I - LESLEY ROYCE
4520 FULTON RD
JACKSONVILLE, FL 32225-0000

I - LETITIA YARBOROUGH
7517 MASON LANDING RD
WILMINGTON, NC 28411-7225

I - LIANE KIRBY
4704 W AZEELE STREET
TAMPA, FL 33609-2509

I - LIANE RUSSELL
130 TABOR RD
OAK RIDGE, TN 37830-5537

I - LIDIA BELKNAP
7 HERBING LANE
KENTFIELD, CA 94904-2812

I - LIGIA VARGAS
16292 SOUTHWEST 66TH STREET
FORT LAUDERDALE, FL 33331-4630

I - LILA MCCAULEY
3040 ASHLEY DR.
CONWAY, AR 72034-0000

I - LILLIAN KENNEY
1701 PINEHURST RD. #20-C
DUNEDIN, FL 34698-0000

I - LILY LEUNG
1106 BISMARCK LN
ALAMEDA, CA 94502-6936

I - LINDA ASHTON
2618 ECTOR RD N
JACKSONVILLE, FL 32211-3862

I - LINDA AUSTIN
2109 JESSIE PLACE
FORT WORTH, TX 76134-2728

I - LINDA BACH
504 FRANCES MCQUEEN RD
VILAS, NC 28692-9670

I - LINDA BARROWS
16735 RIDGEVIEW DRIVE
BROOKFIELD, WI 53005-1353

I - LINDA BAUMGARTEN
170 WEA
NEW YORK, NY 10023-5451

I - LINDA BURIANEK
3443 CLIME RD
COLUMBUS, OH 43223-3438

I - LINDA CHVARAK
3211 SUNDANCE CIRCLE
NAPLES, FL 34109-0000

I - LINDA COX
1073 GREENWOOD LN
LEWISVILLE, TX 75067-5304

I - LINDA DALLES
50 OLCOTT WAY
RIDGEFIELD, CT 06877-3934

I - LINDA DAY
4224 LEHIGH AVE
HOUSTON, TX 77005-1935

I - LINDA GAZZOLA
500 HIGH CLIFFE LN
TARRYTOWN, NY 10591-0000

I - LINDA GLYNN
2739 VISSCHER PLACE
ALTADENA, CA 91001-0000

I - LINDA HOWE
66 SELWYN RD
BELMONT, MA 02478-3556

I - LINDA HUBBLE
10950 JEFFERSON HWY APT C24
NEW ORLEANS, LA 70123-1776

I - LINDA LYERLY
825 MUNEVAR RD
CARDIFF BY THE SEA, CA 92007-1332

I - LINDA QUINET
21 EST 10TH 12B
NEW YORK, NY 10003-5922

I - LINDA RICKS
112 WILLOW ST
BEAUFORT, NC 28516-1735

I - LINDA SCHEEREN
410 NORTHWEST 60TH COURT
MIAMI, FL 33126-4628

I - LINDA SEGALL ANABLE
13805 CALVERT ST
VAN NUYS, CA 91401-2910

I - LINDA SESSINE
6900 POST OAK DR
WEST BLOOMFIELD, MI 48322-3839

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I - LINDA VANDERVEEN
4327 BESSEMER ROAD
BROOKSVILLE, FL 34602-0000

I - LINDA WILLIAMS
33 SWEETSER TER
LYNN, MA 01904-2608

I - LINDSAY MARTIN
1300 S ARLINGTON RIDGE RD APT 307
ARLINGTON, VA 22202-1932

I - LISA BALACH
510 TEMONA DR
PITTSBURGH, PA 15236-4275

I - LISA BROHL
PO BOX 155
PUT IN BAY, OH 43456-0155

I - LISA COPELAND
118 LINCOLN AVE APT 1F
FALL RIVER, MA 02720-3638

I - LISA CRUM-FREUND
356 FAIRBREEZE DR
PORT TOWNSEND, WA 98368-9584

I - LISA D'ANTONIO
3300 PORT ROYALE DR N. # 108
FORT LAUDERDALE, FL 33308-0000

I - LISA GARCIA
346 SANDALWOOD LN
SAN ANTONIO, TX 78216-6841

I - LISA HAUGEN
15225 COUNTRY LN
KEARNEY, MO 64060-8004

I - LISA LANGCAKE
7268 CODDIN LN
FORT MILL, SC 29715-7175

I - LISA MARIOTTI
49 S MAIN ST
RANDOLPH, VT 05060-1348

I - LISA MASTRO
2051 SENASAC AVENUE
LONG BEACH, CA 90815-3308

I - LISA RICE-WILLIAMS
3101 PALM TRACE LANDINGS DR #1308
DAVIE, FL 33324-0000

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KANSAS CITY, MO 64111-0000

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7751 10TH AVE SW
SEATTLE, WA 98106-2021

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13622 7TH AVE CIRCLE NE
BRADENTON, FL 34212-0000

I - LIZ LAUDADIO
2215 WINDSOR DRIVE
MERRITT ISLAND, FL 32952-0000

I - LIZ MURPHY
47 CRESCENT PL
MONROE, CT 06468-1608

I - LIZ RYAN COLE
VERMONT LAW SCHOOL CHELSEA
SOUTH ROYALTON, VT 05068-0096

I - LIZ SIMPSON
1410 14TH ST. N
SAINT PETERSBURG, FL 33704-4114

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28944 HUBBARD ST. LOT 75
LEESBURG, FL 34748-8377

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503 N WASHINGTON ST PO BOX 351
ATKINSON, IL 61235-0351

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14051 EARIE LN
POWAY, CA 92064-4803

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7349 STARFISH DR
SARASOTA, FL 34231-5429

I - LOIS ROBIN
4701 NOVA DR
SANTA CRUZ, CA 95062-4523

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MUIR BEACH, CA 94965-9757

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I - LOREN CLIFT
4120 DAY DR
SAN MARCOS, TX 78666-9540

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FT. MYERS, FL 33967-3302

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1216 9TH AVE NW
ROCHESTER, MN 55901-6761

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VIRGINIA BEACH, VA 23464-1722

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PO BOX 1916
SAN PEDRO, CA 90733-1916

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I - LORI PENICHE
12660 HILLCREST
DALLAS, TX 75230-2032

I - LORI PIPER
1460 21ST STREET SOUTHWEST
NAPLES, FL 34117-4314

I - LORNE BEATTY
573 MAXFIELD RD
BRIGHTON, MI 48114-9649

I - LORRAINE KLEIN
PO BOX 850
ALTOONA, FL 32702-0000

I - LORRAINE MASON
395 LENOVER HILL RD
PARKESBURG, PA 19365-1603

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1517 ASHLEY WOOD CIRCLE
BIRMINGHAM, AL 35216-3051

I - LOUISE MANN
10201 RIVER RD
PETERSBURG, VA 23803-1048

I - LOUISE MC GOWAN
9690 ASTI LA
LAKE WORTH, FL 33467-7036

I - LOUISE TERZIA
2200 WEST RD
LITTLE ROCK, AR 72207-0000

I - LOWELL SMITH
2548 CRUMS CHURCH RD
BERRYVILLE, VA 22611-2016

I - LUANNE SERRATO
1910 BURRY CIRCLE DRIVE
CREST HILL, IL 60403-2004

I - LUCI UNGAR
3 SEMINOLE AVE.
CORTE MADERA, CA 94925-0000

I - LUCY MCCRONE
501 E 32ND ST
CHICAGO, IL 60616-0000

I - LUKE ASBURY
1744 BROCKTON AVE APT 202
LOS ANGELES, CA 90025-3897

I - LUKE LUNDEMO
597 WARRIOR TRAIL
JACKSON, MS 39216-0000

I - LUKE OURADNIK
824 3ND ST N
FARGO, ND 58104-0000

I - LUKE SHAFNISKY
5220 PENNSYLVANIA ST
WHITEHALL, PA 18052-2114

I - LURA IRISH
PO BOX 578
LAKEBAY, WA 98349-0578

I - LYDIA GARVEY
429 S 24TH ST
CLINTON, OK 73601-3713

I - LYLE BROWN
4504 SUN DEVILS AVENUE
BAKERSFIELD, CA 93313-5430

I - LYNDA KEY
5569 E SAGINAW WAY
FRESNO, CA 93727-7538

I - LYNDA LEIBOWITZ
57 CROWS NEST RD APT 3
TUXEDO PARK, NY 10987-4265

I - LYNDA LEIXNER
1045 SOUTHWEST 13TH STREET
BOCA RATON, FL 33486-5404

I - LYNDA TURLEY
10002 SWEET GUM LN
BAYTOWN, TX 77521-4940

I - LYNDE WILLIAMS
2814 COUNTRY CLUB RD
DENTON, TX 76210-8602

I - LYNDSEY BAUER
352 NW 46TH ST
SEATTLE, WA 98107-4441

I - LYNN COFFEY-EDELMAN
27 FOXWOOD DR E
HUNTINGTON STATION, NY 11746-2128

I - LYNN ELLIOTT
2614 WOODMONT DR
DURHAM, NC 27705-2760

I - LYNN MACDONALD
27321 VIA OLMO
MISSION VIEJO, CA 92691-2249

I - LYNN PITNEY
14803 SHEILA ANN DR
HUDSON, FL 34669-0000

I - LYNNE BANTA
1443 N AVENUE 49
1443 N AVENUE 49, CA 90042-1615

I - M ABDELNOUR
350 CROSSING BLVD. APT. # 808
ORANGE PARK, FL 32073-5668

I - M ERICKSON
PO BOX 2448
MONTEREY, CA 93942-2448

I - M HOWELL
2600 NE MINNEHAHA ST
VANCOUVER, WA 98665-1300

I - M. ADDISON
6305 TOCOBEGA DRIVE
LAKELAND, FL 33813-0000

I - M. FISCHER
3400 NW 67TH ST
GAINESVILLE, FL 32606-5747

I - M. ST. VINCENT
7648 INMAN AV S
COTTAGE GROVE, MN 55016-5103

I - M.H. WILKINSON
10817 BREWINGTON ROAD
RICHMOND, VA 23238-4109

I - MACKIE JACKSON
PO BOX 343
LEWISVILLE, NC 27023-0343

I - MADELINE ELSEA
1706 ALTA VISTA DR
BAKERSFIELD, CA 93305-0000

I - MAGGIE DEVANE
AP 204A 200 CAROLINA AV
WINTER PARK, FL 32789-6422

I - MAGGIE DEVANE
4325 S ATLANTIC AVENUE APT 204A
NEW SMYRNA BEACH, FL 32169-0000

I - MAILIE LA ZARR
2805 YOSEMITE BLVD APT 178
MODESTO, CA 95354-4084

I - MALCOLM BRAID
340 COMANCHE STREET
MONTEVALLO, AL 35115-3624

I - MALI HENIGMAN
494 27TH AVENUE APT. 26
SAN FRANCISCO, CA 94121-1807

I - MANDY MERRITT
805 FIRST ST
MERRITT ISLAND, FL 32953-0000

I - MARA WILLIAMS
19337 ORANGE AVE
SONOMA, CA 95476-6215

I - MARC BESCHLER
5 E 51ST ST APT 4A
NEW YORK, NY 10022-5912

I - MARC FLEISHER
2444 BLAINE RD
MOSCOW, ID 83843-7479

I - MARC MCCORD
PO BOX 835994
RICHARDSON, TX 75083-5994

I - MARC SUGARS
2332 18TH AVE
SAN FRANCISCO, CA 94116-2425

I - MARCELLA HAMMOND
4181 UTAH ST
SAN DIEGO, CA 92104-1871

I - MARCELLA MATTHAEI
7172 A1A SOUTH
ST. AUGUSTINE, FL 32080-0000

I - MARCIA DAVID
661 SW 54TH AVENUE
PLANTATION, FL 33317-0000

I - MARCIA HARVEY
5370 MORNING STAR PL
PASO ROBLES, CA 93446-8370

I - MARCY BALLIS
990 SEMINOLE RD
ATLANTIC BEACH, FL 32233-5456

I - MARE WAHOSI
PO BOX 12541
PRESCOTT, AZ 86304-2541

I - MARGARET DEARDO
1311 FAIRSTEAD LN
PITTSBURGH, PA 15217-2585

I - MARGARET EMERSON
THE REGATTA #R-205
901 N PENN ST UNIT R205,
PHILADELPHIA, PA 19123-3131

I - MARGARET ENGLAND
380 RIVERVIEW DRIVE
LABELLE, FL 33935-0000

I - MARGARET NICHOLSON
1810 ORCHARD AVE
GLENDALE, CA 91206-4146

I - MARGARET PETERSON
249 ELMS AVE
TAWAS CITY, MI 48763-9313

I - MARGARET SHERMOCK
18180 KELLY LAKE RD
CARVER, MN 55315-9664

I - MARGARET SIFFERLIN
9470 GALECREST DR
CINCINNATI, OH 45231-3908

I - MARGARET SILVER
1829 SEA OATS DR
ATLANTIC BEACH, FL 32233-4511

I - MARGARET WELKE
410 CLEMONS AVE
MADISON, WI 53704-5504

I - MARGE FISHER
2822 CIRCLE DRIVE
PORTSMOUTH, OH 45662-2445

I - MARGE WEIMER
169 BRIAR LN
169 BRIAR LN, CA 94403-3339

I - MARGIE & OREST SZYMANKYJ
3607 LINDSAY LN
CRYSTAL LAKE, IL 60014-4785

I - MARGUERITE CLARK
750 WEAVER DAIRY RD APT 3115
CHAPEL HILL, NC 27514-1443

I - MARGUERITE PANZICA
12528 STILLMAN ST
LAKEWOOD, CA 90715-1818

I - MARI DEVLIN
1522 W MAIN ST
HOUSTON, TX 77006-4710

I - MARIA DIFIORE
2418 W EASTWOOD AVE
CHICAGO, IL 60625-2908

I - MARIA NASIF
6601 N LONGFELLOW DR
TUCSON, AZ 85718-2417

I - MARIA PAPAZIAN
4800 GRANADA BOULEVARD
COCONUT GROVE, FL 33146-2023

I - MARIA STAHL
605 EMPIRE ST
MONTPELIER, OH 43543-1414

I - MARIAN CRUZ
661 4TH ST
HOLLISTER, CA 95023-3601

I - MARIAN O'DONNELL
4601 S. ATLANTIC AVE UNIT 101
PONCE INLET, FL 32127-0000

I - MARIANNE BITHELL
1019 ALDER GROVE RD
ARCATA, CA 95521-9212

I - MARIANNE CORRIERE
752 SE CEPHAS LISTON RD
BRANFORD, FL 32008-5197

I - MARIANNE PENDLETON
2741 BAYSIDE LN
FLUSHING, NY 11358-1055

I - MARIE D'ANNA
516 RUSSELL AVE
RIDGEFIELD, NJ 07657-2111

I - MARIE PLANTE
9209 TOPEKA ST
BETHESDA, MD 20817-3307

I - MARIE ROSS
127 ARGUELLO AVE
VALLEJO, CA 94591-7905

I - MARILYN BROWN
4609 PEBBLE CREEK COURT
PENSACOLA, FL 32526-4380

I - MARILYN SAUNDERS
43 GRAND AVE
RIDGEFIELD PARK, NJ 07660-1215

I - MARILYNN HEILMAN
163 GRIER AVENUE
BARNESVILLE, PA 18214-2226

I - MARIO G RIVERA
1528 AVENUE L NW
1528 AVENUE L NW, FL 33881-2326

I - MARION AUSTIN
134 TRISTRAM DRIVE
BOZEMAN, MT 59718-0000

I - MARION BERNSTEIN
PO BOX 673
SANDISFIELD, MA 01255-0673

I - MARION HILLIARD
2902 GREENRIDGE RD
ORANGE PARK, FL 32073-6412

I - MARJORIE EWELL
3316 SE 22ND PLACE
3316 SE 22ND PLACE, FL 33904-0000

I - MARK BUESE
SENIOR VICE PRESIDENT
KIRBY CORPORATION
P.O. BOX 1745
HOUSTON, TX 77251

I - MARK FELDMAN
137 WINCHESTER DR
SANTA ROSA, CA 95401-9137

I - MARK FORD
COALITION TO RESTORE COASTAL LA
6160 PERKINS ROAD, SUITE 225
BATON ROUGE, LA 70808

I - MARK HAYDUKE GRENARD
1030 E MORROW DR
PHOENIX, AZ 85024-2926

I - MARK HENSMAN
8514 TIMBER PINE CT
ELLICOTT CITY, MD 21043-6063

I - MARK LEESON
44 HICKORY CT
ORWIGSBURG, PA 17961-9124

I - MARK LESHER
25021 159TH ST
LEAVENWORTH, KS 66048-7337

I - MARK LUCE
8263 E PIMA ST
TUCSON, AZ 85715-5217

I - MARK PARSI
150 DOMINION PARK DR. #938
HOUSTON, TX 77090-0000

I - MARK RAUSCHER
305 CAMELOT DR
OCEANSIDE, CA 92054-4514

I - MARK SCHNEIDER
11682 BROOKSHIRE AVE
GARDEN GROVE, CA 92840-3622

I - MARLA BOTTESCH
PO BOX 458
NORRIDGEWOCK, ME 04957-0458

I - MARLA SORRELLS
933 TIDEWATER LN
CAROLINA BEACH, NC 28428-4642

I - MARLANA PITAS
90 PITAS AVE
SOUTH ATTLEBORO, MA 02703-7119

I - MARLENA LANGE
23 ROYCE AVE
MIDDLETOWN, NY 10940-4708

I - MARLIESE BONK
1335 COMMERCIAL ST
PITTSBURGH, PA 15218-1151

I - MARSHA ALEXANDER
428 LEAFY BRANCH TRAIL
CARMEL, IN 46032-7402

I - MARSHA ARMSTRONG
19618 WEEBURN LANE
TARZANA, CA 91356-0000

I - MARSHA BASSETT
235 ISBEL DRIVE
SANTA CRUZ, CA 95060-1959

I - MARTA BLACK
41 CLINTON AVE
RIDGEWOOD, NJ 07450-3602

I - MARTHA ATKINSON
4161 DEER CREEK RD
VALLEY, WA 99181-9718

I - MARTHA BUSHNELL
502 ORD DR
BOULDER, CO 80303-4732

I - MARTHA CLARK
903 S ELM ST
DENTON, TX 76201-6811

I - MARTHA FELICE
APT 133 200 STARCREST DR
CLEARWATER, FL 33765-3804

I - MARTHA FULTON
412 228TH ST SW #201
BOTHELL, WA 98021-0000

I - MARTHA GLENN
3509 LISA LN
LAKELAND, FL 33801-9778

I - MARTHA GREEN
1314 E. GORE ST. APT. A
ORLANDO, FL 32806-0000

I - MARTHA HOGARTH
345 ROCK CREEK PARK AVE NE
ALBUQUERQUE, NM 87123-4834

I - MARTHA J. KENNEY
5785 THOMPSON RD
CLARENCE CTR, NY 14032-9724

I - MARTHA JANE RIPPLE
915 WELHAM GREEN RD
GREAT FALLS, VA 22066-1517

I - MARTHA OLVER
PO BOX 28
AMHERST, MA 01004-0028

I - MARTHA RESK
1021 ANGELA STREET
KEY WEST, FL 33040-0000

I - MARTHA SWAIM
2722 5TH AVENUE
SACRAMENTO, CA 95818-3508

I - MARTI LEWIS
5059 HIGHWAY 100 W
PLEASANTVILLE, TN 37033-2735

I - MARTIN BASKIN
2121 JAMIESON AVENUE UNIT 1201
ALEXANDRIA, VA 22314-5713

I - MARTIN BIDNEY
912 TAYLOR DR
VESTAL, NY 13850-3934

I - MARTIN COOK
16 SABAL BEND
PALM COAST, FL 32137-4328

I - MARTIN GROMULAT
4605 FARGREEN ROAD
HARRISBURG, PA 17110-0000

I - MARTINA CLARK
8 SHERWOOD LN
WESTAMPTON, NJ 08060-3727

I - MARVIN & CAROL SOROOS
2876 WYCLIFF RD
RALEIGH, NC 27607-3035

I - MARY & RICHARD KING
590 WEBER
AKRON, OH 44303-1829

I - MARY ANN HILGEMAN
6400 MINNESOTA AVE
SAINT LOUIS, MO 63111-2807

I - MARY ANN WILSON
10433 WILSHIRE BLVD APT 902
LOS ANGELES, CA 90024-4629

I - MARY ANNA FEITLER
1957 COUNTY ROAD 68
AUBURN, IN 46706-9521

I - MARY BERNSTEIN
912 CENTER ST
SANTA CRUZ, CA 95060-3808

I - MARY BRADSHAW
23920 N LINE CAMP STREET
SAN ANTONIO, TX 78255-2005

I - MARY CENTORE
65 CARRELL RD
RANDOLPH, NJ 07869-2922

I - MARY CERULLO
FRIENDS OF CASCO BAY
43 SLOCUM DR
FALMOUTH, ME 04105-1881

I - MARY ECHOLS
917 11TH ST. NORTH
NAPLES, FL 34102-0000

I - MARY ELLEN WHITWORTH
3201 ALLEN PKWY STE 200
HOUSTON, TX 77019-1800

I - MARY FAZEKAS
1008 EAST SUNNYSLOPE ROAD
PETALUMA, CA 94952-0000

I - MARY HICKEY
208 W UNIVERSITY ST
WOOSTER, OH 44691-2865

I - MARY JACKSON
6011 QUIET VILLAGE CT
HOUSTON, TX 77053-0000

I - MARY JANE HILES
1126 ERWIN ST
ELKHART, IN 46514-3533

I - MARY JO FARCO
587 MIDWAY DR A
587 MIDWAY DR A, FL 34472-0000

I - MARY KARCH
600 BROADWAY SUITE 200
KANSAS CITY, MO 64105-0000

I - MARY KEARNEY
20740 VIA ROJA
YORBA LINDA, CA 92886-3115

I - MARY KOZUB
280 PEBBLECREEK DR
LAKE ZURICH, IL 60047-2721

I - MARY LELLOUCHE
18510 66TH AVE NE
KENMORE, WA 98028-7927

I - MARY LOU CAMPBELL
7030 2AND3/4 MILE EAST
MERCEDES, TX 78570-9522

I - MARY NELL BRYAN
810 SUMMERLY DR
NASHVILLE, TN 37209-4221

I - MARY OWENS
311 CURTIS ST.
WARNER ROBINS, GA 31093-0000

I - MARY PROPHET
1514 CHESTNUT ST
BERKELEY, CA 94702-1133

I - MARY RAPP
814 PERSHING ST
WILLARD, MO 65781-8150

I - MARY RAUSCH
15201 ADMIRALTY WAY UNIT C7
LYNNWOOD, WA 98087-2437

I - MARY RAWL
1345 PLUMOSA DR
FORT MYERS, FL 33901-7727

I - MARY REIMER
5471 S LIBBY RD SPC 36
PARADISE, CA 95969-5932

I - MARY REMER
421 HAWTHORNE BLVD
LEESBURG, FL 34748-0000

I - MARY ROCHESTER
4300 NW 103RD DR
CORAL SPRINGS, FL 33065-2368

I - MARY SCHILDER
3603 SLEEPY HOLLOW DR
SANTA ROSA, CA 95404-1530

I - MARY WEST
7234 SE 18TH AVE
PORTLAND, OR 97202-0000

I - MARYANN RICHMOND
56 BUTTONWOOD DR
LITITZ, PA 17543-8487

I - MARYELLEN HEALY
1213 BURLINGHAM RD
PINE BUSH, NY 12566-7324

I - MARYELLEN REDISH
671 S RIVERSIDE DR APT 6
PALM SPRINGS, CA 92264-0648

I - MARYLOU KLEIN
19200 SW 101ST PLACE RD
DUNNELLON, FL 34432-0000

I - MATT BRENNAN
2141 26TH ST UNIT 201
SAN FRANCISCO, CA 94107-3299

I - MATT MCCABE
1021 N GARFIELD ST APT 102
ARLINGTON, VA 22201-2549

I - MATT STOECKER
3130 ALPINE RD STE 288-411
PORTOLA VALLEY, CA 94028-7549

I - MATTHEW & BLANCHE FREUND
12155 ROMA RD
BOYNTON BEACH, FL 33437-0000

I - MATTHEW BRADY
633 ELDORADO BLVD APT 1026
BROOMFIELD, CO 80021-8830

I - MATTHEW COPLAN
3040 DREXMORE DR
CUYAHOGA FALLS, OH 44223-3527

I - MATTHEW KENNEDY
102 SHAMROCK DR
CONWAY, AR 72034-6706

I - MATTHEW NEKOLA
7860 ZIKES RD S
BLOOMINGTON, IN 47401-9177

I - MATTHEW PINTAR
618 LOUISE COURT
CANONSBURG, PA 15317-0000

I - MATTHEW R. COURTER
10612 DIXON DRIVE SOUTH
SEATTLE, WA 98178-2717

I - MAUREEN FAHLBERG
1735 TEAKWOOD ST
BOULDER CITY, NV 89005-2052

I - MAUREEN POWERS
PO BOX 2826
HOMER, AK 99603-2826

I - MAUREEN WRIGHT
2816 KENTUCKY ST NE
ALBUQUERQUE, NM 87110-3408

I - MAY DORN
8718 VAN HEUSEN RD
CLAY, NY 13041-9604

I - MEL HENSHAW
2125 5TH AVE APT 3
SAN DIEGO, CA 92101-2137

I - MELANIE DELANEY
18 MALLARD COVE
BALLSTON LAKE, NY 12019-0000

I - MELINDA BASHEN
PO BOX 12862
ARLINGTON, VA 22219-2862

I - MELINDA HENDERSON
4340 B NORMANDY DR
NAPLES, FL 34112-0000

I - MELINDA WEISSER-LEE
3864 W KIMBALL ST
THATCHER, AZ 85552-5112

I - MELISSA DARCO
755 ASBURY AVENUE SOUTH
OCEAN CITY, NJ 08226-3720

I - MELISSA EPPLE
20 VILLAGE LN
SANTA FE, NM 87505-9368

I - MELISSA FONG
1306 WILDERNESS DR
AUSTIN, TX 78746-0000

I - MELISSA GASKINS
5785 SAINT JOE RD
TALLAHASSEE, FL 32311-8585

I - MELISSA GONZALEZ
191 14TH AVE
HOLTSVILLE, NY 11742-2347

I - MELISSA JUDGE
1711 W AILEEN ST
1711 W AILEEN ST, FL 33607-2019

I - MELISSA LEMKE
533 GLEN ST
GLENS FALLS, NY 12801-2206

I - MELISSA PARKER
543 STEERE FARM ROAD
HARRISVILLE, RI 02830-0000

I - MELISSA SAMET
SENIOR DIRECTOR, WATER RESOURCES
AMERICAN RIVERS
6 SCHOOL STREET, STE. 200
FAIRFAX, CA 94930

I - MELISSA SAMET
AMERICAN RIVERS
6 SCHOOL STREET, SUITE 200
FAIRFAX, CA 94930

I - MELISSA SAMET
83 VALLEY RD
SAN ANSELMO, CA 94960-1531

I - MELISSA WILSON
1210 W TOWANDA AVE
EL DORADO, KS 67042-2446

I - MELODIE PAULSEN
19003 CHANNEL LN NE
WYOMING, MN 55092-9507

I - MELVA PADILLA
PO BOX 4060
SAN FELIPE PB, NM 87001-4060

I - MERCY DRAKE
320 E MCKELLIPS RD LOT 165
MESA, AZ 85201-2153

I - MEREDITH SCHNELLE
25176 W EDGAR AV
ANTIOCH, IL 60002-8976

I - MERLE NEIDELL
40 BACON RD
SAINT JAMES, NY 11780-1011

I - MICHAEL BAKUNAS
3532 N OPAL AVE
CHICAGO, IL 60634-3028

I - MICHAEL BILECKI
31 LOCUST RD
BROOKHAVEN, NY 11719-9627

I - MICHAEL BORDENAVE
951 N ADOLINE AVE
FRESNO, CA 93728-2941

I - MICHAEL BRENNAN
452 MAIN ST APT 215
EAST HARTFORD, CT 06118-1430

I - MICHAEL CHARNOFSKY
3018 CAPP ST
3018 CAPP ST, CA 94602-0000

I - MICHAEL CRAGO
801 RUE DAUPHINE # 304
METAIRIE, LA 70005-4608

I - MICHAEL DEWAN
24 RUTHERFORD CIRCLE
STERLING, VA 20165-6219

I - MICHAEL DORNBERG
800 NW 18TH AVE APT 16
GAINESVILLE, FL 32609-0000

I - MICHAEL DUFFY
1412 CANTON STREET
ORLANDO, FL 32803-3306

I - MICHAEL GARNER
2ND AVE
SACRAMENTO, CA 95817-2115

I - MICHAEL GARVIN
1 SPRING HILL CIR
SAUSALITO, CA 94965-1776

I - MICHAEL GODLEWSKI
3757 N PIEDRA CIR
MESA, AZ 85207-1150

I - MICHAEL HAMMOND
442 S BROAD ST
LITITZ, PA 17543-2602

I - MICHAEL HUBER
PO BOX 22
ORCAS, WA 98280-0022

I - MICHAEL JANSKY
REGIONAL EIS COORDINATOR
U.S. ENVIRONMENTAL PROTECTION AGENCY
1445 ROSE AVENUE, SUITE 1200
DALLAS, TX 75202-2733

I - MICHAEL KEMMERER
52 BELMONT SQ
DOYLESTOWN, PA 18901-4432

I - MICHAEL LAUGHLIN
523 MONICA DR
LEBANON, IL 62254-1769

I - MICHAEL LETENDRE
92 CASS ST # 1
PORTSMOUTH, NH 03801-4941

I - MICHAEL LEVREAULT
10504 NE 137TH PL
KIRKLAND, WA 98034-2018

I - MICHAEL MAHONEY
2953 S MILWAUKEE CIR
DENVER, CO 80210-6755

I - MICHAEL MAYO
143 SHOTWELL PARK
SYRACUSE, NY 13206-3256

I - MICHAEL MCFARLAND
6377 VISTA DR APT 7209
WEST DES MOINES, IA 50266-5539

I - MICHAEL MCMANUS
800 E LINCOLN AVE APT 5
ROYAL OAK, MI 48067-3349

I - MICHAEL ROGERS
1887 VAN NESS AVE
KLAMATH FALLS, OR 97601-1842

I - MICHAEL SAXE
6279 S.E. 8TH LANE
OCALA, FL 34472-0000

I - MICHAEL STOCKER
100 RIVERSIDE DR
NEW YORK, NY 10024-4822

I - MICHAEL SUTHERLAND
1114 WELLINGTON DR
CHARLESTON, SC 29412-4846

I - MICHAEL TOOBERT
212 MALLARD DR
GRASS VALLEY, CA 95945-5745

I - MICHAEL W. EVANS
12325 CHARNOCK RD
LOS ANGELES, CA 90066-3105

I - MICHAELA OLDFIELD
2300 WASHINGTON BLVD APT 203
ARLINGTON, VA 22201-1101

I - MICHELE DEIBLER
13104 BRANDENBURG HOLLOW RD
SMITHSBURG, MD 21783-9292

I - MICHELE GIELIS
147 DUDLEY ST
CAMBRIDGE, MA 02140-2444

I - MICHELE MCRAE
61 STONEDELL DRIVE
DALLAS, GA 30157-0000

I - MICHELLE CAUFIELD
315 N 2ND ST
HARRISON, NJ 07029-2543

I - MICHELLE HUDAK
11610 COLONY LAKE DRIVE
TAMPA, FL 33635-0000

I - MICHELLE HUTCHINS
1177 JACKSON ST
MISSOULA, MT 59802-3839

I - MICHELLE JORDAN
3913 CASTRO VALLEY BLVD SPC 41
CASTRO VALLEY, CA 94546-6038

I - MICHELLE LEMLEY
1209 S MILLS AVE
LODI, CA 95242-3900

I - MICHELLE MICHLEWICZ
1923 BRIGHTON DAM RD
BROOKEVILLE, MD 20833-0000

I - MICHELLE SCHUMAN
2240 SEARLES RD.
BALTIMORE, MD 21222-0000

I - MIDGE JOLLY & TOM WEYANT
18930 ROSALIND RD
SUMMERLAND KEY, FL 33042-3217

I - MIJANOU BAUCHAU
1941 LOOKOUT DR
AGOURA HILLS, CA 91301-2928

I - MIKASA MOSS
300 N RIDGE LN
TEMPLE, GA 30179-4850

I - MIKE CAFFREY
1631 POPLAR ST
GREENSBURG, PA 15601-5455

I - MIKE GLICK
615 JACKSON ST
LA CROSSE, WI 54601-5339

I - MIKE HORTON
705 VALLEY OAKS RD
GREENWOOD, IN 46143-0000

I - MIKE KEARNEY
KEARNEY COMPANIES
4000 FRANCE ROAD PARKWAY
NEW ORLEANS, LA 70126

I - MIKE KEMPF
PO BOX 784
LOTUS, CA 95651-0784

I - MIKE LENNEY
411 WALNUT STREET # 2374
GREEN COVE SPRINGS, FL 32043-3443

I - MIKE LORINO
ASSOCIATED BRANCH PILOTS
3813 N. CAUSEWAY BLVD.
METAIRIE, LA 70002

I - MIKE MACDOUGALL
10105 N PARKSIDE DR
NINE MILE FALLS, WA 99026-9269

I - MIKE RABASCO
11130 DRAKE ST NW
COON RAPIDS, MN 55433-3770

I - MIKE RUSSO
3559 GLEN RIDGE DR
CHINO HILLS, CA 91709-2813

I - MIKE SEXTON
2524 COMMONWEALTH DR LOT 52
JUNCTION CITY, KS 66441-4286

I - MIKE WEBB
1503 SOUTHPORT DR APT 124
AUSTIN, TX 78704-7814

I - MIKKI CHALKER
119 PROSPECT ST
BINGHAMTON, NY 13905-2328

I - MILES CROOM
ASSISTANT REGIONAL ADMINISTRATOR
U.S. DEPARTMENT OF COMMERCE, NOAA
263 13TH AVENUE SOUTH
ST. PETERSBURG, FL 33701

I - MINDY MAYERS
33 CRYSTAL LAKE LN
THE WOODLANDS, TX 77380-1893

I - MINDY SCHLIMGEN
639 TIBURON DR
PRESCOTT, AZ 86303-7219

I - MIRIAM KARL
621 HIGHLAND CT
MANDEVILLE, LA 70448-7024

I - MISTI JANCOSEK
51832 VANCE VISTA CT
SOUTH BEND, IN 46628-9297

I - MITSUKA HORIKAWA
1427 LINDA WAY
ARCADIA, CA 91006-4434

I - MOGI KINSEY-O'NEIL
54 SUNSET ROAD
KEY LARGO, FL 33037-0000

I - MOLLY MCCARTY
2838 S 9TH PLACE
MILWAUKEE, WI 53215-3946

I - MOLLY WEIGEL
8 DIVERTY RD
PENNINGTON, NJ 08534-5009

I - MONROE JEFFREY
802 E 6TH ST APT 303
LOS ANGELES, CA 90021-1045

I - MORGAN CRAWFORD
113 GALAX LN
DURHAM, NC 27703-9273

I - MYRIEM LE FERRAND
PO BOX 2171
DURANGO, CO 81302-2171

I - MYRNA POTOTSKY
428 NORTHEAST 17TH AVENUE
FORT LAUDERDALE, FL 33301-1346

I - N.J. MAC
2570 MCMILLAN STREET
EUGENE, OR 97405-3115

I - NADA WAREHAM
P.O.BOX 656
ELM MOTT, TX 76640-0656

I - NADIA INGRAM
5170 LEMON BAY DRIVE
VENICE, FL 34293-0000

I - NANCY BAUR
14288 SOUTHEAST JOHNSON ROAD
MILWAUKIE, OR 97267-2335

I - NANCY BEAVERS
3988 MOORE HOLLOW RD
WOODLAWN, TN 37191-9202

I - NANCY CAILLOUET
100 PEARL DRIVE
LAUREL, MS 39440-1322

I - NANCY DOUCETTE
1117 E SHORE DR
WEST PALM BEACH, FL 33406-5124

I - NANCY ECKEL
9 SHEPARD RD
NORFOLK, CT 06058-1197

I - NANCY EMBLOM
260 S STEEL ST
ISHPEMING, MI 49849-2641

I - NANCY FORTUNATO
249 N MARION STREET
PALATINE, IL 60074-5470

I - NANCY G CHESNUTT
PO BOX 1070
SAINT HELENA ISLAND, SC 29920-1070

I - NANCY GATHING
3701 TULANE AVE
MADISON, WI 53714-2952

I - NANCY GRUTTMAN-TYLER
307 BEAUREGARD HEIGHTS
HAMPTON, VA 23669-1461

I - NANCY HODGKINS
1400 N BARCELONA ST
PENSACOLA, FL 32501-2004

I - NANCY HOUGH
808 W END AVE APT 706
NEW YORK, NY 10025-5310

I - NANCY JACKSON
550 RED MAPLE RD
BLOUNTSVILLE, AL 35031-4761

I - NANCY L REICHER
401 W 58TH TERRACE
KANSAS CITY, MO 64113-1269

I - NANCY MCGEE
1726 N 1ST ST
MILWAUKEE, WI 53212-3969

I - NANCY MENASCO
503 HAYNES AV
SHREVEPORT, LA 71105-3825

I - NANCY O'HARROW
4124 ORCHARD WAY
LAKE OSWEGO, OR 97035-1842

I - NANCY PATUMANOAN
1506 THORNTON RD
HOUSTON, TX 77018-4143

I - NANCY SHAW
35 VAGABOND LANE
WINTER HAVEN, FL 33881-9229

I - NANCY SMITH
1564 RODMAN ST
FALL RIVER, MA 02721-3640

I - NANCY SPEARS
15 SOUTHGATE DRIVE
BOSSIER CITY, LA 71112 8603

I - NANCY STALEY
4788 LIBERTY GROVE ROAD
LIBERTY, NC 27298-8042

I - NANCY STEVENSON
1331 FOREST ST
ST PAUL, MN 55106-0000

I - NANDITA SHAH
7024 MINK HOLLOW RD
HIGHLAND, MD 20777-9770

I - NAOMI GREENFIELD
4491 NW 99TH TERRACE
SUNRISE, FL 33351-4748

I - NATALIE ABRAM
11416 UNITED BLVD
LOUISVILLE, KY 40229-2572

I - NATALIE QUIET
2154 ORCHARD PL APT D22
FORT COLLINS, CO 80521-6006

I - NATALIE SANCHEZ
6035 KENNEDY BLVD E
WEST NEW YORK, NJ 07093-3834

I - NATALIE SNIDER
COALITION TO RESTORE COASTAL LA
6160 PERKINS ROAD, SUITE 225
BATON ROUGE, LA 70808

I - NATALIE SNIDER
SCIENCE DIRECTOR
COALITION TO RESTORE COASTAL LOUISIANA
6160 PERKINS ROAD STE.225
BATON ROUGE, LA 70808

I - NATASHA SAMTO
356 CHICAGO AVENUE
356 CHICAGO AVENUE, FL 32580-1123

I - NATASHA SHPILLER
5601 N SHERIDAN RD
CHICAGO, IL 60660-4804

I - NATHAN JAMES LEIN
810 THIRD AVENUE SOUTH WEST
OELWEIN, IA 50662-0000

I - NATHAN KRAUSE
SOLUTIA
3000 OLD CHEMSTRAND ROAD
CANTONMENT, FL 32560

I - NAYEEM ASLAM
135 ELK TRAIL
CAROL STREAM, IL 60188-0000

I - NEAL HALLORAN
317 MUELLER RD
COCHECTON, NY 12726-5134

I - NEIL BOCCANFUSO
212 MAXSON AVE
POINT PLEASANT BORO, NJ 08742-2127

I - NELSON LOCK
29 CIRCLE DR
DECATUR, IL 62521-4128

I - NETA VILLALOBOS-BELL
5085 BLACKNELL LANE
SANFORD, FL 32716-0000

I - NEWTON LOGAN
4517 APPLE WAY
BOULDER, CO 80301-1740

I - NIA DOHERTY
1558 S 6TH ST W
MISSOULA, MT 59801-3342

I - NICHOLAS ROMANO
703 E 133RD ST
BRONX, NY 10454-3425

I - NICK GORDY
5405 BEEBE ST NE
5405 BEEBE ST NE, NM 87111-1903

I - NICKOLAS GUTIERREZ
8240 LINGER LODGE RD DIAMOND K RANCH
BRADENTON, FL 34202-0000

I - NICOLAS WIENDERS
571 OAKLAND AVENUE
TALLAHASSEE, FL 32301-0000

I - NICOLE MIANI
3652 LORIMER LN
ENCINITAS, CA 92024-5507

I - NICOLE SAMPIERI
7426 CAPITAL HEIGHTS STREET
ENGLEWOOD, FL 34224-0000

I - NICOLE TURNER
1901 GARFIELD AVE
WILMINGTON, DE 19809-1366

I - NIKI PESTEL
974 KAHENA ST
HONOLULU, HI 96825-1077

I - NIKKI WOJTALIK
3723 GREEN OAK CT
PARKVILLE, MD 21234-4258

I - NIYATI BROWN
PO BOX 82
PAAUILO, HI 96776-0082

I - NK ACEVEDO
33 WAVE AVE # 3
REVERE, MA 02151-5452

I - NOEL BEDNAZ
PO BOX 709
SOUTHWICK, MA 01077-0709

I - NOEL HOLLAND
222 W 83RD ST
NEW YORK, NY 10024-4909

I - NORAH RENKEN
5603 N SYRACUSE ST
PORTLAND, OR 97203-5241

I - NOREEN KENNY
3730 BILL DOWNING RD
RAYMOND, MS 39154-0000

I - NORMAN BENDROTH
35 GRANVILLE RD
CAMBRIDGE, MA 02138-6806

I - NORMAN F. WADE
920 SHERWOOD ST
MISSOULA, MT 59802-2604

I - O. BISOGNO SCOTTI
5078 LEMON GROVE AVE
LOS ANGELES, CA 90029-3760

I - OLIVIA DUSOLD
6903 WAYNE AVE
6903 WAYNE AVE, PA 19119-0000

I - OSCAR PENA
SHAW GROUP
97 ELYSIAN DRIVE
HOUMA, LA 70363

I - OTTO ONASCH
262 HAMILTON DR.
DELHI, NY 13753-0206

I - P. MAGEE
3 HEARTWOODS CT APT A
SAINT LOUIS, MO 63132-4452

I - PALMER CRAIG
206 ARROWHEAD TRAIL
WARNER ROBINS, GA 31088-5330

I - PALOMA NAVARRETE
PO BOX 2251
TAOS, NM 87571-2251

I - PAMELA CHIPMAN
36320 ROAD N
MANCOS, CO 81328-9118

I - PAMELA COHEN
320 KOCH AVE APT 1
ANN ARBOR, MI 48103-5446

I - PAMELA DANNACHER
2519 PERSHING AVE
DAVENPORT, IA 52803-2645

I - PAMELA HANSON
304 SPRING STREET APT. 1
SAINT JOHNSBURY, VT 05819-0000

I - PAMELA HOPKINS
452 S.E. EDGEWOOD DRIVE
STUART, FL 34996-0000

I - PAMELA KOSINSKI
6500 KNIGHT DRIVE SOUTHEAST
PORT ORCHARD, WA 98367-9097

I - PAT BARBUTTI
1159 NIMITZ LN
FOSTER CITY, CA 94404-3623

I - PAT GALLWAY
PORT OF NEW ORLEANS
P.O. BOX 60046
NEW ORLEANS, LA 70160

I - PAT HARDEN
5200 S.W. 25TH BLVD #3224
GAINESVILLE, FL 32608-0000

I - PAT KULTGEN
115 BRANDY HL
LORENA, TX 76655-9745

I - PAT MURRELL
187 W 19TH ST
ALTON, IL 62002-0000

I - PAT PASCUAL
1216 ROUTE 311
PATTERSON, NY 12563-2823

I - PAT SHARP
312 MARSHALL ST
GRASS VALLEY, CA 95945-7212

I - PAT WATKINS
110 CHRISTOPHER CIRCLE
SLIDELL, LA 70460-0000

I - PATRICIA ASHTON
269 E CRESCENT AVE
269 E CRESCENT AVE, CA 92373-6811

I - PATRICIA BRADDY
6 MAISONS DRIVE
LITTLE ROCK, AR 72223-0000

I - PATRICIA BROTMAN
16 SNOWDEN RD
BALA CYNWYD, PA 19004-2633

I - PATRICIA BURCHARD
122 MAIN ST
CAMDEN, NY 13316-1138

I - PATRICIA COFFEY
2253 WOODBINE RD
LANGLEY, WA 98260-8222

I - PATRICIA DISHMAN
914 BRIARWOOD CRST
NASHVILLE, TN 37221-4351

I - PATRICIA FEAREY
20 IRWIN WAY APT 738
ORINDA, CA 94563-2587

I - PATRICIA GEORGE
706 S SGT WOODALL DR
CAMP VERDE, AZ 86322-7136

I - PATRICIA MACKURA
1338 WINSTON RD
SOUTH EUCLID, OH 44121-2516

I - PATRICIA MATEJCEK
PO BOX 2067
SANTA CRUZ, CA 95063-2067

I - PATRICIA MCCAIN
1405 JIM MATHIS RD
BRYAN, TX 77808-8041

I - PATRICIA MICHAELOFF
1206 W PONTOON RD
GRANITE CITY, IL 62040-2233

I - PATRICIA PARSONS
1314 W PATTERSON STREET
TAMPA, FL 33604-4722

I - PATRICIA PHILLIPS
487 WOLCOTT AVE
KENT, OH 44240-2355

I - PATRICIA ROSSI
1 MAPLEWOOD DR
LEVITTOWN, PA 19056-1016

I - PATRICIA SIKORA
1229 AMERICAN LEGION HWY
WESTPORT, MA 02790-1125

I - PATRICIA SNOWDEN
5145 WESTBARD AVE
BETHESDA, MD 20816-1413

I - PATRICIA SUNNY WALTER
12525 206TH PL SE
ISSAQUAH, WA 98027-8543

I - PATRICIA WALLACE
66 EDGEWOOD AVENUE
NEW HAVEN, CT 06511-4615

I - PATRICK BOSOLD
202 N 5TH ST
FAIRFIELD, IA 52556-2501

I - PATRICK EGGLESTON
69 TIMBERLANE DR
KEENE, NH 03431-2069

I - PATTI CONSTANTINO
17249 HELEN K DR
SPRING HILL, FL 34610-7720

I - PATTY KOTELES
9002 AVERY RD
BROADVIEW HTS, OH 44147-2508

I - PATTY MAJORS
4875 SUMMERFIELD RD
PETERSBURG, MI 49270-9708

I - PAUL BECHTEL
734 CAJON STREET
REDLANDS, CA 92373-5940

I - PAUL BUECHLER
2211 LA COSTA DR
ROWLETT, TX 75088-6205

I - PAUL BUSCH
1523 LAUREL AVE
SAINT PAUL, MN 55104-6739

I - PAUL HARRISON
ENVIRONMENTAL DEFENSE
1875 CONNECTICUT AVE NW, STE 600
WASHINGTON, DC 20009

I - PAUL HOFFERKAMP
512 HERITAGE DR
OSWEGO, IL 60543-8689

I - PAUL HOLM
11521 HOLM RD SW
ROCHESTER, WA 98579-9625

I - PAUL HOPKINS
1168 W MAIN STREET APT. 3
BELLEVUE, OH 44811-9014

I - PAUL HUDDY
5233 E WOODSPRING DRIVE
TUCSON, AZ 85712-1364

I - PAUL KEMP
LOUISIANA STATE UNIVERSITY
COASTAL AND ENVIRONMENT BUILDING
LSU 1002Q ENERGY
BATON ROUGE, LA 70803

I - PAUL KRIPLI
11445 SHILLING DR
STERLING HEIGHTS, MI 48314-3556

I - PAUL KUTRUBES
23 ASHUELOT ST APT B
WINCHESTER, NH 03470-3221

I - PAUL LIMA
9648 BIG SPRINGS RD
CHRISTIANA, TN 37037-5952

I - PAUL MALONEY
4243 BRUSSELS DR
JACKSON, MS 39211-6106

I - PAUL MARTINEZ
16725 BUCK PATH
LOCKPORT, IL 60441-7646

I - PAUL MILLER
10306 KERRIGAN ST
SANTEE, CA 92071-1207

I - PAUL ROHRBACH
P.O. BOX
OAKLAND, CA 94619-0000

I - PAUL SCHMALZER
6109 GALLOP COURT
TITUSVILLE, FL 32780-0000

I - PAUL WILKINS
2303 CEDROS CIR
SANTA FE, NM 87505-5252

I - PAUL YATES
112 GANO AVE
GEORGETOWN, KY 40324-1912

I - PAULA DODSON
246 RIVER HILLS DR
JACKSONVILLE, FL 32216-8925

I - PAULA ELLIOTT
26 CHERRY HILL CIRCLE
METHUEN, MA 01844-0000

I - PAULA FELDMAN
1651 ROSLYN DRIVE
COLUMBIA, SC 29206-2931

I - PAULA GRUGINSKI
2819 NORTHEAST 47TH STREET
VANCOUVER, WA 98663-2124

I - PAULA MENYUK
162 MASON TER
BROOKLINE, MA 02446-2772

I - PAULA PHILLIPS
8 SAN ROSSANO DR
GOLETA, CA 93117-1914

I - PAULETTE WHITCOMB
9085 W 95TH AVE
WESTMINSTER, CO 80021-4313

I - PEG SCHULTE
6034 N MARMORA AVE
CHICAGO, IL 60646-3904

I - PEG (MARGARET) LAUBER
3419 MCELROY COURT
EAU CLAIRE, WI 54701-0000

I - PEGGY CADIGAN
8975 FILLMORE RD
FREDONIA, WI 53021-0000

I - PEGGY FUGATE
6685 STILLWELL BECKETT RD
OXFORD, OH 45056-9246

I - PEGGY OGATA
2002 MENTONE AVENUE
PASADENA, CA 91103-1431

I - PEGGY RETHERFORD
10350 HOOVER WOODS RD
GALENA, OH 43021-9413

I - PEGGY ROBINSON
2020 WILLOWAY CT S
COLUMBUS, OH 43220-0000

I - PEGGY SEARS
1648 ARBOR KNOLL LOOP
TRINITY, FL 34655-7182

I - PEGGY STUBBS
35724 US 231 N PO BOX 31
ASHVILLE, AL 35953-0031

I - PEGGY WYNN
122 BAG END RD
HENDERSONVILLE, NC 28739-2286

I - PEGGY-JO SCHULTE
6034 N MARMORA AVENUE
CHICAGO, IL 60646-3904

I - PENELOPE JOHNSTONE
PO BOX 2882
OAKHURST, CA 93644-2882

I - PENNY WIRT
4311 CRYSTAL LAKE DRIVE APT. #314
POMPANO BEACH, FL 33064-1296

I - PERRIE'LEE PROUTY
5213 NORBECK RD.
ROCKVILLE, MD 20853-0000

I - PETE RICHARDSON
10 WHITE OAK DR APT 113
EXETER, NH 03833-5320

I - PETER & MARY ALICE BELOV
325 W DARLAND DR
GOLDENDALE, WA 98620-9557

I - PETER ADAMS
516 WATERS EDGE
NEWTOWN SQUARE, PA 19073-2131

I - PETER BARNETT
12086 99TH AVENUE
SEMINOLE, FL 33772-2126

I - PETER BROMER
13205 NORTHEAST 3RD COURT
MIAMI, FL 33161-3927

I - PETER BRUCKER
PO BOX 1089
SAWYERS BAR, CA 96027-1089

I - PETER CAMARATA
4015 BOWEN FALLS PLACE
SARASOTA, FL 34243-4256

I - PETER HAY
11727 COUNTRY SPRINGS ST
SAN ANTONIO, TX 78249-2657

I - PETER THEIS
3203 N BAYVIEW LN
MCHENRY, IL 60051-9621

I - PHILIP CROLL
52 BALLARD BRANCH RD
WEAVERVILLE, NC 28787-9761

I - PHILIP NARO
124 E MAIN ST APT 1
BOZEMAN, MT 59715-4728

I - PHILIP O'HARTIGAN
726 DAYLILY LN
BAINBRIDGE ISLAND, WA 98110-2919

I - PHILIP VIRGIL
4504 ABBOTT AVE APT 8
DALLAS, TX 75205-3935

I - PHILLIP GOUBEAUD
2950 PINE NECK RD PO BOX 5
SOUTHOLD, NY 11971-0005

I - PHILLIP HALL
RHODIA ECO SERVICES
1275 AIRLINE HWY
BATON ROUGE, LA 70817

I - PHILLIP J. CRABILL
430 COPPERAS TRL
HIGHLAND VILLAGE, TX 75077-7256

I - PHILLIP SHERMAN
2507 NW HOLIDAY, CT.
STUART, FL 34994-0000

I - PHILLIP WEBSTER
903 SUGARCANE WAY
CLARKSVILLE, TN 37040-2883

I - PHYL MORELLO
984 HARRISON FERRY
WHITE PINE, TN 37890-0000

I - PHYLLIS RUTH
113 ELMTOWNE BLVD
HAMMONTON, NJ 08037-2544

I - PIER HARDIN
8 LANCASTER RD
MOBILE, AL 36608-1928

I - PINE DUBOIS
93 ELM ST
KINGSTON, MA 02364-1901

I - PINKY JAIN PAN
PO BOX 14982
SANTA ROSA, CA 95402-6982

I - POLLY SEARFOS
2620 CLUBHOUSE CIR
POWELL, OH 43065-8632

I - POLLY VICTOR
5543 N FRESNO ST APT D
FRESNO, CA 93710-8326

I - POPPY GLOR
14901 SE 272ND ST APT P204
KENT, WA 98042-8182

I - PRISCILLA & ROGER WALDMAN
6594 WALDMANN LANE
SEVEN VALLEYS, PA 17360-8840

I - PROBYN GREGORY
1766 N LAS PALMAS AVE
LOS ANGELES, CA 90028-4810

I - QUENTIN & JACQUELYN WENZEL
17 CIRCLE DR
STROUDSBURG, PA 18360-8883

I - R. VANSTRIEN
PO BOX 301
LIBERTY CORNER, NJ 07938-0301

I - RACHAEL DENNY
2680 LYNCH CANYON RD
BRADLEY, CA 93426-9656

I - RACHAEL STERN
3318 NUNDY ROAD
TAMPA, FL 33618-2526

I - RACHEL DOLNEY
2315 ORLANDO PL
PITTSBURGH, PA 15235-2768

I - RACHEL DOLNEY
1315 MONTE LN
WINTER PARK, FL 32792-2203

I - RACHEL WEAVER
768 QUEEN ANNE RD
AMSTERDAM, NY 12010-8188

I - RACHEL WOLF
403 EMELINE AVE
SANTA CRUZ, CA 95060-2244

I - RACHELLE GIULIANI
RIDGE STREET
MARQUETTE, MI 49855-3163

I - RACHELLE GREENE
13042 CLAREWOOD DR
HOUSTON, TX 77072-1765

I - RACHELLE WARD
9630 S BIG THUNDER DR
VAIL, AZ 85641-6035

I - RAE NEWMAN
7921 SW 100TH ST
MIAMI, FL 33156-2521

I - RAINEY LAMEY
2319 PACKARD ST APT 205B
ANN ARBOR, MI 48104-6359

I - RALPH BOCCHETTI
939 ARCADIA AVE
ARCADIA, CA 91007-7151

I - RALPH SANCHEZ
PO BOX 223153
CARMEL, CA 93921-6607

I - RANDEL ROGERS
5931 BAYTREE DR
GALLOWAY, OH 43119-9288

I - RANDI KUHNE
5641 SOUTH OAKRIDGE DRIVE
HOMOSASSA, FL 34448-4957

I - RANDOLPH GYULAY
3735 RANDOM DR
AKRON, OH 44319-2240

I - RANDOLPH SCHOEDLER
3709 W MICHIGAN ST
MILWAUKEE, WI 53208-3714

I - RANDY MOERTLE
BILOXI MARSH LANDS CORPORATION
1008 MAR DRIVE
LOCKPORT, LA 70374

I - RANDY MOERTLE
BILOXI MARSHLANDS CORP.
1008 MAR DRIVE
LOCKPORT, LA 70374

I - RANDY SAILER
1018 CHERRY LN
BEULAH, ND 58523-6421

I - RANDY TASHJIAN
1031 TRAFALGER DR
GLENDALE, CA 91207-1139

I - RAUL DE BRIGARD
8 CHRISTIAN HILL RD
HIGGANUM, CT 06441-4030

I - RAVIN CARLSON
117 AVENIDA LUCIA
SAN CLEMENTE, CA 92672-3414

I - RAY CUNNINGHAM
526 S HUNT CLUB BOULEVARD
APOPKA, FL 32703-4960

I - RAY MORRIS
7319 PEMBROKE AVE
BAKERSFIELD, CA 93308-3702

I - RAY SCHRAFT
113 SUMMERDALE ROAD
ANGOLA, NY 14006-9027

I - RAYMOND BRAGAR
250 E 54TH ST APT P-5
NEW YORK, NY 10022-4810

I - RAYMOND BUTLER
EXECUTIVE DIRECTOR
GULF INTRACOASTAL CANAL
2010 BUTLER DRIVE
FRIENDSWOOD, TX 77546

I - RAYMOND BUTLER
GULF INTRACOASTAL CANAL ASSOC.
2010 BUTLER DRIVE
FRIENDSWOOD , TX 77546

I - RAYMOND GILL
200 217TH PL SW
BOTHELL, WA 98021-8227

I - RAYMOND GILL
310 PASEO ENCINAL ST
SAN ANTONIO, TX 78212-1708

I - RAYMOND KEELING
762 PANORAMA DR
MILFORD, MI 48381-1552

I - REBECCA BUERKETT
PO BOX 37
RAINBOW LAKE, NY 12976-0037

I - REBECCA GEMMILL
101 SANDY BOTTOM DR
HARDYVILLE, VA 23070-0001

I - REBECCA GILBERT
821 SYCAMORE DR
CANTON, GA 30115-9487

I - REBECCA GOFF
6394 TERRACE LN
SALIDA, CO 81201-3650

I - REBECCA HARGROVE
112 RAMUNNO CIRCLE
HOCKESSIN, DE 19707-0000

I - REBECCA HARPER
2616 CORDELIA ROAD
LOS ANGELES, CA 90049-1220

I - REBECCA KOO
1050 JOHNSON AVE
SAN JOSE, CA 95129-3126

I - REBECCA LONG
61 MAY AVE PO BOX 353
CHAUNCEY, OH 45719-0353

I - REBECCA OLSEN
35 LIBERTY LN
PETALUMA, CA 94952-0000

I - REBECCA SWEAT
PO BOX 476
CRAWFORDVILLE, FL 32326-0066

I - RED MCGEE
3038 S RICHARDT AVE
INDIANAPOLIS, IN 46239-1365

I - RENEE BAUERLY
310 S MIRALESTE DR UNIT 88
SAN PEDRO, CA 90732-6031

I - RENEE DOLNEY
2315 ORLANDO PL
PITTSBURGH, PA 15235-2768

I - RHETT LAWRENCE
6445 N COMMERCIAL AVE
PORTLAND, OR 97217-2024

I - RHONDA LAWFORD
855 PINE BLUFF RD
MORRIS, IL 60450-7373

I - RHONDA ROTHROCK
7398 HICKORY RIDGE RD.
CARBONDALE, IL 62901-0000

I - RHONDA WEST
608 HILL ST
COPPERAS COVE, TX 76522-1521

I - RICH & LINDA KOLEHMAINEN
4125 SIEFER DR
ROOTSTOWN, OH 44272-9615

I - RICH SPISAK
4284 AIMEE LANE
WILLOUGHBY, OH 44094-7902

I - RICHARD & YVETTA WILLIAMS
29841 KNOLL VIEW DR
RANCHO PALOS VERDES, CA 90275-6437

I - RICHARD BERGMANN
1025 SUMMER LAKES DR
ORLANDO, FL 32835-5128

I - RICHARD CAMPBELL
88 HICKORY PL
ROCKAWAY, NJ 07866-2812

I - RICHARD CARDELL
1528 CORNELL RD
JACKSONVILLE, FL 32207-7702

I - RICHARD CHURRAY
P.O. BOX 505
PORT HAYWOOD, VA 23138-0000

I - RICHARD FELS
3417 CHIMNEY ROCK ROAD
MANHATTAN, KS 66503-2407

I - RICHARD FERNALD
PO BOX 1320
BEND, OR 97709-1320

I - RICHARD FLETCHER
11055 FORESTVIEW LN
SAN DIEGO, CA 92131-1327

I - RICHARD FRAZIER
522 ALAMO TRL
GRAPEVINE, TX 76051-8004

I - RICHARD HARDIN
105 NW SINCLAIR DR
GRANTS PASS, OR 97526-3363

I - RICHARD HEANING
12 SENECA DR
N MASSAPEQUA, NY 11758-1026

I - RICHARD J. TREITNER
PO BOX 222 9 ACADEMY ST
PINE HILL, NY 12465-0222

I - RICHARD KENNON
37814 NE 234TH AVE
YACOLT, WA 98675-4812

I - RICHARD KRAMER
8505 SOUTHWEST 80TH PLACE
MIAMI, FL 33143-7003

I - RICHARD LEE
2001 W SUPERIOR ST # 228
DULUTH, MN 55806-2019

I - RICHARD LETOURNEAU
386 HUNT CUTOFF
HALLSVILLE, TX 75650-3104

I - RICHARD PASICHNYK
1007 W MAIN ST LOT 11
MESA, AZ 85201-7127

I - RICHARD RASKIN
13724 BLUEFIN DR
WOODBRIDGE, VA 22193-0000

I - RICHARD ROTHSTEIN
11600 SOUTHWEST 96TH TERRACE
MIAMI, FL 33176-2593

I - RICHARD SANDERS
2022 DRIFTSTONE DR
GLENDORA, CA 91740-5388

I - RICHARD SONNENBERG
419 ORLENA AV
LONG BEACH, CA 90814-0000

I - RICHARD SPOTTS
1125 W EMERALD DR
SAINT GEORGE, UT 84770-6026

I - RICHARD STRAWSER
6548 KINGS CHARTER RD
REYNOLDSBURG, OH 43068-1941

I - RICHARD TILL
1436 SE STARK ST APT 205
PORTLAND, OR 97214-1491

I - RICHARD WREDE
305 MAIN ST
RIVERTON, NJ 08077-1240

I - RICK BLANCHETT
1441 SW 97TH AVE
PEMBROKE PINES, FL 33025-0000

I - RICK MEYERS
7015 N 90TH ST
MILWAUKEE, WI 53224-4706

I - RICKI BENNETT
65 RIVERSIDE AVE APT 32
MEDFORD, MA 02155-4604

I - RICKY TAYLOR
4221 114TH ST SE
EVERETT, WA 98208-7761

I - RITA SANFORD
454 REQUEZA STREET APT. 218A
ENCINITAS, CA 92024-6760

I - RIVER EYES
1918 N 7TH ST
BOISE, ID 83702-2805

I - ROB BRODERICK
818 QUEEN DR
WEST CHESTER, PA 19380-1442

I - ROB CAYLOR
5458 LIPPAN WAY
INDIANAPOLIS, IN 46221-4893

I - ROB ROCKE
98 LINDEN ST APT A
NEW HAVEN, CT 06511-2453

I - ROB SACCOCCIO
4609 GRAMERCY CT
RALEIGH, NC 27609-5580

I - ROB SELTZER
6465 KANAN DUME RD
MALIBU, CA 90265-4040

I - ROBBY STROZIER
130 CALLOWAY DR. APT. B
MACON, GA 31204-2944

I - ROBERT A. SARGENT
320 MAIN ST
SALEM, NH 03079-2498

I - ROBERT APPERSON
1311 LORIMER ROAD
RALEIGH, NC 27606-0000

I - ROBERT B. KAPLAN
PO BOX 577
PORT ANGELES, WA 98362-0105

I - ROBERT BARRINGTON
32 THORNDIKE ST
BEVERLY, MA 01915-5837

I - ROBERT C. DAVENPORT
50 WINCHESTER ST APT 305
BROOKLINE, MA 02446-2754

I - ROBERT CARRINGTON
1138 18TH AVENUE S.
BIRMINGHAM, AL 35205-0000

I - ROBERT FINKBINE
8150 S OPEN TRAIL LN
APACHE JUNCTION, AZ 85218-5121

I - ROBERT FURSICH
9 LONGFELLOW ST
HARTSDALE, NY 10530-0000

I - ROBERT GARTNER
6319 SHERINGHAM ST
HOUSTON, TX 77085-3244

I - ROBERT HILL
E1251 CHANNEL PARK DR
WAUPACA, WI 54981-9737

I - ROBERT HOLSTON
BUZZI UNICEM
14900 INTRACOASTAL DRIVE
NEW ORLEANS, LA 70129

I - ROBERT J. MOLDOVAN
90 LOON MOUNTAIN LANE
CENTER CONWAY, NH 03813-0000

I - ROBERT JANUSKO
43 UPSALA PATH
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SALEM, OR 97301-4450

I - ROBERT KEISER
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CORAL GABLES, FL 33143-8145

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S ATTLEBORO, MA 02703-7820

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I - ROBERT MAGILL
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MARIETTA, GA 30066-4804

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I - ROBERT PALSHA
2720 TERRACE DRIVE
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I - ROBERT PANCNER
7936 REDONDO CT
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1542 SW 18TH TER
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3099 E VIRGO PL
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I - ROBERT WOLF
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I - ROBERTA CLAYPOOL
350 OCEAN DR
KEY BISCAYNE, FL 33149-1611

I - ROBERTA E. NEWMAN
300 MONTE VISTA AVENUE
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I - ROBERTA HYLTON
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ABINGDON, VA 24211-6772

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ST AUGUSTINE, FL 32080-5906

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200 JANZEN WAY
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I - ROGER PACKARD
N7550 N SHORE ROAD
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1290 7TH ST, CA 90254-4946

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7000 MONUMENT DR # A
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35 VIA ENCANTO
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I - RUSSELL WEISZ
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STONE RIDGE, NY 12484-5004

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LOS ALTOS, CA 94022-2121

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I - SANDY LEVINE
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2905 W GENESEE ST, NY 13219-0000

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I - SHARON RUSSICK
2851 S OCEAN BOULEVARD APT. 4L
BOCA RATON, FL 33432-8405

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I - SHEILA WARD
265 CALLE SORBONA # 2 URB UNV. GDNS
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2700 N A1A 6-102
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77 SIRCY RIDGE LANE
PLEASANT SHADE, TN 37145-3324

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8216 BART AVE NE
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11281 E 13 MILE RD
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I - STACEY BAKER
178 GARRISON XING
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I - STACEY CYRUS
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ITHACA, NY 14850-5606

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I - SUE KAUFLIE
840 JACKSON ST.
LANSDALE, PA 19446-5262

I - SUE STEINMANN
7046 REIMANN RD
ARENA, WI 53503-9536

I - SUMNER PEIRCE
1501 NORTHWEST 42ND STREET
FORT LAUDERDALE, FL 33309-4527

I - SUSAN BLAKER
SAN ANTONIO, TX 78223-0000

I - SUSAN BROADHEAD
328 MARTINS CREEK RD
BARNARDSVILLE, NC 28709-8705

I - SUSAN BURGENBAUCH
275 ANDSBURY AVE
MOUNTAIN VIEW, CA 94043-4801

I - SUSAN C. HINZPETER
2375 H STREET
BAKER CITY, OR 97814-1872

I - SUSAN CARROLL
3203 150TH ST
FLUSHING, NY 11354-3245

I - SUSAN CHANDLER
1060 S US HIGHWAY 1 LOT 99
VERO BEACH, FL 32962-5681

I - SUSAN CUMMINS
5913 RAMSGATE ROAD
BETHESDA, MD 20816-1127

I - SUSAN DAVIS
6348 POCAHONTAS CLUB RD
VIRGINIA BEACH, VA 23457-1260

I - SUSAN EMERY
6906 ARBOR OAKS COURT
BRADENTON, FL 34209-7435

I - SUSAN EVILSIZER
20529 BROOKSTONE TRL
CLEVELAND, OH 44130-2489

I - SUSAN GEEAR
2211 SPRING ST
MEDFORD, OR 97504-6377

I - SUSAN GOLDIN
141 BEEBE POND RD
CANAAN, NY 12029-2505

I - SUSAN HARDIN
804 KONRAD COURT
LITTLE ROCK, AR 72223-9201

I - SUSAN HASKEW
PO BOX 1504
SIERRA VISTA, AZ 85636-1504

I - SUSAN KEPNER
105 MILL RD
HAMPTON, NH 03842-3338

I - SUSAN KUHN
9807 NE SKIDMORE ST
PORTLAND, OR 97220-3565

I - SUSAN L. D. SHAMBLIN
1230 KINGLET DR
MORGANTON, NC 28655-6739

I - SUSAN LAHEY
206 14TH AVENUE NE
ST. PETERSBURG, FL 33701-0000

I - SUSAN MARKOWITZ
PO BOX 656
LAHASKA, PA 18931-0656

I - SUSAN MERRITT
19924 BUHRSTONE DR
GAITHERSBURG, MD 20886-1017

I - SUSAN MOCK
2705 CHESTNUT ST
WILMINGTON, NC 28405-3039

I - SUSAN P. VESSICCHIO
66 POPE STREET
NEW HAVEN, CT 06512-0000

I - SUSAN ROSS
3510 NYLAND WAY
LAFAYETTE, CO 80026-8900

I - SUSAN SCHNEIDER
1326 SW 104TH COURT
MIAMI, FL 33174-0000

I - SUSAN SELBIN
600 ALCALDE PL SW UNIT 2B
ALBUQUERQUE, NM 87104-1055

I - SUSAN SILBERBERG
1127 EAGLE WAY
LYONS, CO 80540-8434

I - SUSAN SMART
16280 72ND RD. N
LOXAHATCHEE, FL 33470-3107

I - SUSAN SNYDER
1894 TUDOR RD
NORTH PALM BEACH, FL 33408-0000

I - SUSAN STRAND
107 SIMMONS WAY
FOLSOM, CA 95630-1831

I - SUSAN WOLF
405 GARDEN STATE DR
CHERRY HILL, NJ 08002-1915

I - SUSAN YORKE
7501 SW SPRINGHAVEN AVE
INDIANTOWN, FL 34956-0000

I - SUZANN GILMORE
610 FELLOWSHIP DRIVE
FERN PARK, FL 32730-2781

I - SUZANNE GREENE
JONES FALLS WATERSHED
3000 CHESTNUT AVE STE 100
BALTIMORE, MD 21211-2756

I - SUZANNE MURPHY LARRONDE
7101 LA RONDA COURT BA293
SARASOTA, FL 34238-0000

I - SUZANNE PIERSON
1845 DEER VALLEY RD
BOULDER, CO 80305-5227

I - SUZANNE WONG
1041 NE 166 ST
NORTH MIAMI BEACH, FL 33162-0000

I - SYBIL KOHL
18103 NE 159TH AVE
BRUSH PRAIRIE, WA 98606-8738

I - SYDNEY COFFEE
LACPR
1051 N 3RD ST., STE 138, CAPITOL
BATON ROUGE, LA 70804

I - SYLVIA BARNARD
84 WILLETT ST
ALBANY, NY 12210-1038

I - SYLVIA CARDELLA
4570 BLUFF TOP
HYDESVILLE, CA 95547-9416

I - SYLVIA KANEKO
22 PETTEE ST
NEWTON, MA 02464-1213

I - SYLVIA RODRIGUEZ
227 E 5TH ST APT 3FW
NEW YORK, NY 10003-8556

I - T. CRUGNOLA
VENDITTO RD.
REVERE, MA 02151-2894

I - T. LOGAN RUSSELL
PO BOX 2052
MADISON, MS 39130-2052

I - T.S. MCMILLIN
299 E COLLEGE ST
OBERLIN, OH 44074-1354

I - TAMARA BONECK
505 MESA CT
WAUKESHA, WI 53188-4413

I - TAMARA CROLL
N7703 EVERGREEN DR
CHRISTMAS, MI 49862-8958

I - TAMERA BRYANT
990 BRYDEN RD
COLUMBUS, OH 43205-1812

I - TAMMY AMBLER
16259 LONE STAR RANCH DR
CONROE, TX 77302-8303

I - TAMMY ROBINSON
1588 LAKE COUNTRY DR
ASHEBORO, NC 27205-0508

I - TAMRA MCCONOUGHEY
1532 W HIGH STREET
DAVENPORT, IA 52804-2117

I - TANYA COWPERTHWAITE
8622 CHAPEL DR
ANNANDALE, VA 22003-3618

I - TASH HODGES
PO BOX 78
FAYETTEVILLE, OH 45118-0078

I - TAWNYA SHIELDS
2975 KELLY RD
HERNANDO, MS 38632-7962

I - TED FISHMAN
790 VILLA TERESA WAY
SAN JOSE, CA 95123-2639

I - TERI MUROFF
5613 CATALPA AVE
RIDGEWOOD, NJ 11385-4833

I - TERRENCE PAVLETIC
12810 W NORTH LANE
NEW BERLIN, WI 53151-9055

I - TERRI GREENWELL
8610 HIGHLAND RD
MARTINSVILLE, IN 46151-8320

I - TERRI HUCK
8713 WADEBROOK TER
SPRINGFIELD, VA 22153-3417

I - TERRY CUMMINGS
6740 E 10TH AVE
ANCHORAGE, AK 99504-1814

I - TERRY HUEY
PO BOX 22253
LEXINGTON, KY 40522-2253

I - TERRY KILCREASE
308 FOREST AREA RD
KINSTON, AL 36453-6044

I - TERRY MILLER
106 WARRINER AVE
LITCHFIELD, MI 49252-9741

I - TERRY PROEGER
755 INDIAN BEACH LANE
SARASOTA, FL 34234-5744

I - TERRYANN TOWERS
141 WELLINGTON RD
RINDGE, NH 03461-7804

I - THADDEUS CHAUVIN
1218 DOGWOOD AVENUE
NEW IBERIA, LA 70560-5733

I - THERESA EVERETT
500 HIGH CLIFFE LANE
TARRYTOWN, NY 10591-0000

I - THERESA JAQUESS
417 13TH ST APT C
HUNTINGTON BEACH, CA 92648-4560

I - THERESA PERENICH
215 RIVERHILL DR
ATHENS, GA 30606-4039

I - THERESA SISKIND
11763 7TH LANE NORTH BLD#8 APT#4
ST. PETERSBURG, FL 33716-0000

I - THERESA TERHARK
8602 JEWEL AVE S
COTTAGE GROVE, MN 55016-4901

I - THOMAS ALEXANDER
499 BELL LANE

QUINCY, CA 95971-9682

I - THOMAS BRENNER
512 BELLA ST

HOLLIDAYSBURG, PA 16648-2304

I - THOMAS C. JACKSON
SE LA FLOOD PROTECTION AUTHORITY-EAST

203 PLAUCHE COURT
HARAHAN, LA 70123

I - THOMAS CONROY
1466 11TH ST
MANHATTAN BEACH, CA 90266-6108

I - THOMAS FEDORKA
7472 GORDON LOOP
BROOKSVILLE, FL 34601-7041

I - THOMAS GROSS
11409 PERICO ISLE CIR
BRADENTON, FL 34209-0000

I - THOMAS KALIHI
95-185 HOKUULA PLACE
MILILANI, HI 96789-1029

I - THOMAS KLEM
725 KUSER RD APT E4
HAMILTON, NJ 08619-0000

I - THOMAS MULLIGAN
222 SUNSET AV
ISLAND PARK, NY 11558-2242

I - THOMAS NELSON
105 DREXEL AVE
LANSDOWNE, PA 19050-1304

I - THOMAS PASS
1304 7TH ST
LAKE CHARLES, LA 70601-6320

I - THOMAS PATNAUDE
2460 SUMAC WAY
SAINT PAUL, MN 55125-3944

I - THOMAS SAAM
2651 PINEAPPLE AVE
MELBOURNE, FL 32935-0000

I - THOMAS WELTON
202 MARSHALL ST
BROOKNEAL, VA 24528-0000

I - THOR BAHRMAN
PO BOX 724
CORBIN, KY 40702-0724

I - TIA TRIPLETT
4073 BLEDSOE AVE
LOS ANGELES, CA 90066-5429

I - TIM BARLOW
923 RIVER MOUNTAIN DR
HENDERSON, NV 89015-2740

I - TIM FLOOD
503 E MEDLOCK DR
PHOENIX, AZ 85012-1512

I - TIM GLOVER
9660 ESTUARY WAY
SEBASTIAN, FL 32958-6337

I - TIM REEDE
3302 24TH AVE S
MINNEAPOLIS, MN 55406-2404

I - TIM ROBBINS
1131 N MARYLAND AVE
GLENDALE, CA 91207-1606

I - TIM WALTERS
1458 PARAMOUNT DRIVE APT 4A
HUNTSVILLE, AL 35806-0000

I - TIMOTHY BROWN
520 W 15TH ST
THE DALLES, OR 97058-1527

I - TIMOTHY COLEMAN
30 HORSESHOE LN
REPUBLIC, WA 99166-9537

I - TIMOTHY DEVINE
24702 BROADMORE AVE

HAYWARD, CA 94544-1126

I - TIMOTHY DODDY
SE LA FLOOD PROTECTION AUTHORITY-EAST

203 PLAUCHE COURT
HARAHAN, LA 70123

I - TIMOTHY DOODY
PRESIDENT-SOUTHEAST LOUISIANA FLOOD PROTECTION AUTHORITY-EAST
FLOOD PROTECTION AUTHORITY-EAST
203 PINACHE COURT, SUITE B
HARAHAN, LA 70122

I - TIMOTHY KENNEDY
2527 WEST 49TH STREET
DAVENPORT, IA 52806-0000

I - TIMOTHY KNECHT
1716 SE 49TH AVE
PORTLAND, OR 97215-3225

I - TIMOTHY MOSSMAN
4105 CHRISTACY WAY
MARIETTA, GA 30066-2780

I - TIMOTHY SHANAHAN
10470 FALCON AVE
FOUNTAIN VALLEY,, CA 92708-7412

I - TINA BURNS
241 VALLEY RD
ROCHESTER, NY 14618-2511

I - TINA FRITTS
715 MINNESOTA AVE
OWATONNA, MN 55060-3614

I - TINA HENIZE
PO BOX 421162
SUMMERLAND KEY, FL 33042-0000

I - TINA HOROWITZ
4701 PINE ST APT M8
PHILADELPHIA, PA 19143-7002

I - TINA MCQUISTON
1816 CHANDRAPURA LN APT A
FAIRFIELD, IA 52556-9098

I - TINA MOSSBARGER
5567 CYNTHIA LANE
SARASOTA, FL 34235-0000

I - TOBI ZAUSNER
137 E 38TH ST APT 6J
NEW YORK, NY 10016-2620

I - TODD FRIEDMAN
5707 15TH ST N
ARLINGTON, VA 22205-2856

I - TODD SOMODEVILLA
568 10TH ST
BROOKLYN, NY 11215-4402

I - TODD WEBSTER
4000 SOUTHWEST 47TH STREET LOT E3
GAINESVILLE, FL 32608-2203

I - TODD WILSON
1504 HENRY ST
NORMAL, IL 61761-4824

I - TOM BURKETT
1793 RIVER RD
GRANVILLE, OH 43023-9523

I - TOM FERGUSON
543 N MACDONALD
MESA, AZ 85201-5017

I - TOM HEINRICH
14651 W COUNTY ROAD B
HAYWARD, WI 54843-6627

I - TOM HISSONG
408 GOLD KEY BLVD
DAYTON, OH 45415-2129

I - TOM HOLDER
2103 PLUM RD
STARKVILLE, MS 39759-2727

I - TOM MERRIMAN
2515 MERIDIAN ST
HUNTSVILLE, AL 35811-0000

I - TOM SCIAMANNA
1329 W HILE RD
MUSKEGON, MI 49441-4829

I - TOM WALLS
PO BOX 130265
CORAM, MT 59913-0265

I - TOMAR LEVINE
191 CLAREMONT AVE APT 43
NEW YORK, NY 10027-4035

I - TONI SNIDOW
9323 MANCHACA RD APT 1124
AUSTIN, TX 78748-6257

I - TONJA G.
631 MILL STREET
EXCELSIOR, MN 55331-0000

I - TONY DEFALCO
4347 NE SUMNER ST
PORTLAND, OR 97218-1543

I - TONY KOROMILAS
3640 ALAN DRIVE
TITUSVILLE, FL 32780-5213

I - TRACY HART
25 BLUE HERON RD
WAKEFIELD, RI 02879-5648

I - TRINITY ROWLES
2912 WEST 31ST AVENUE
VANCOUVER, BC V6L 2A4

I - TRISHA STEPHENS
10761 NORTHWEST 14TH STREET #287
PLANTATION, FL 33322-6950

I - V. ALEXANDER
PO BOX 11302
ALBUQUERQUE, NM 87192-0302

I - VALERIE FRIEDMAN
7948 SNOWBERRY CIRCLE
ORLANDO, FL 32819-0000

I - VALI FLYNN
3030 GOPHER CANYON RD
VISTA, CA 92084-1212

I - VAN VIVES
1501 SADDLE LN
BARTLESVILLE, OK 74006-5745

I - VERNETTA MULLINS
11222 ELMFIELD DRIVE
TAMPA, FL 33625-5704

I - VESNA GLAVINA
1703 KOSOLA AVE APT A2
FAIRFIELD, IA 52556-9227

I - VIC LANDRY, SR.
EVANS-GRAVES-HPO
329 VIRGINIS STREET
NEW ORLEANS, LA 70124

I - VIC MILES
5917 WORNALL RD
KANSAS CITY, MO 64113-1401

I - VICKI BAROCO
1182 E LAKEVIEW AVE
PENSACOLA, FL 32503-5324

I - VICKI DODSON
1004 UNION AVE
BALTIMORE, MD 21211-1820

I - VICKIE DUFFOURC
SCI / JEFF PARISH
615 4TH STREET
WESTWEGO, LA 70094

I - VICKY MIERAU
1766 HOLLY ST
DENVER, CO 80220-1445

I - VICTORIA BUCHANAN
7126 DARTMOUTH AVENUE N
SAINT PETERSBURG, FL 33710-7544

I - VICTORIA BUTTS
4008 TURQUOISE DRIVE
PENSACOLA, FL 32507-9299

I - VICTORIA RAY
15006 134 AVE EAST
PUYALLUP, WA 98374-0000

I - VIOLET RESTALL
820 NOCTURNE DR
CHULUOTA, FL 32766-0000

I - VIRGINIA ADKINS
2506 THORNTON RD # B
AUSTIN, TX 78704-4910

I - VIRGINIA ANDERSON
310 SUNSHINE DRIVE
COCONUT CREEK, FL 33066-1845

I - VIRGINIA DALE PEARCE
207 DONALDSON ST
STATESBORO, GA 30458-7128

I - VIRGINIA DOWNS
3701 40TH ST
LUBBOCK, TX 79413-2647

I - VIRGINIA ILARDI
2786 N STAR DR
BARTLETT, TN 38134-4712

I - VIRGINIA LAMARCHE
1838 HWAY 35 WEYBRIDGE D-3
WALL, NJ 07719-3523

I - VIVIAN FAHLGREN
1837 SALLY CREEK CIR
HAYWARD, CA 94541-5442

I - WADE ALBRECHT
10014 WOODSTOCK RD
GARDEN PRAIRIE, IL 61038-0000

I - WALTER PHILLIPS
610 BENHAM AVE
NEOSHO, MO 64850-1101

I - WALTER SYKES
PO BOX 733
JOSEPH, OR 97846-0733

I - WAYNE KELLY
1257 SISKIYOU BLVD # 1133
ASHLAND, OR 97520-2241

I - WAYNE LAUBSCHER
749 E CROAK HOLLOW RD
LOCK HAVEN, PA 17745-8153

I - WAYNE SALMON
9300 KERWOOD DR
INDIANAPOLIS, IN 46240-1326

I - WAYNE TEEL
3715 HIDDEN MEADOW LN
KEEZLETOWN, VA 22832-2033

I - WAYNE THIBEAULT
6348 16 PLACE SOUTH
WEST PALM BEACH, FL 33415-5468

I - WAYNE UDE
4249 NUTHATCH WAY
CLINTON, WA 98236-8714

I - WENDY BROWN
1773 TANGLEWOOD COURT APT. 2
BURLINGTON, KY 41005-0000

I - WENDY EAMES
2100 MEADOW BROOK DR
ROUND ROCK, TX 78664-2332

I - WENDY KRUPNICK
4993B OCCIDENTAL RD
SANTA ROSA, CA 95401-5638

I - WHITE BEAR
15240 40TH AVE S PO BOX 69533
TUKWILA, WA 98168-9533

I - WHITNEY SCHUTT
3694 FELIZ CREEK RD
HOPLAND, CA 95449-9701

I - WILHELMINA MYENBURG
11300 SW 94TH AV
MIAMI, FL 33176-4200

I - WILLIAM & MARIANNE SHERMAN
106 FLINTRIDGE DR
MOUNTAIN HOME, AR 72653-6352

I - WILLIAM BELKNAP
629 DON VINCENTE DR
BOULDER CITY, NV 89005-3018

I - WILLIAM BRANSON
3933 N MARSHFIELD AVENUE
CHICAGO, IL 60613-2515

I - WILLIAM BUSS
449 RECLINING ACRES RD
CORRALES, NM 87048-0000

I - WILLIAM GONZALEZ GARCIA
5 SLINN AVE APT B6
SPRING VALLEY, NY 10977-4262

I - WILLIAM KENNEDY
5935 CARGO CIR
KEARNS, UT 84118-8235

I - WILLIAM MORRISON
PO BOX 215
KENNESAW, GA 30156-0215

I - WILLIAM O. JENKINS
562 SOUTHWEST COMET TERRACE
PORT SAINT LUCIE, FL 34953-2942

I - WILLIAM OBERJOHN
3645 RAMBO AVENUE
ALLIANCE, OH 44601 5260

I - WILLIAM O'CONNOR
427 S.W. 5 ST
GAINESVILLE, FL 32601-0000

I - WILLIAM SARBELLO
933 E PINE HILL DR
SCHENECTADY, NY 12303-5559

I - WILLIAM SCHULTHEIS
S46W39028 COUNTY ROAD ZC
DOUSMAN, WI 53118-9568

I - WILLIAM SNYDER
124 ROSEWOOD DR
GREENBELT, MD 20770-1622

I - WILLIAM WOLLSCHLAGER
4068 COQUINA DRIVE
SANIBEL, FL 33957-0000

I - WILLIS WHITTAKER
4651 MARYSVILLE ROAD
DELAWARE, OH 43015-9528

I - WILMA BRADBEER
130 STRIBLING AVE
CHARLOTTESVILLE, VA 22903-2941

I - WRETHA SWINEHART
116 BRUSHWOOD DRIVE
MANSFIELD, OH 44907-2878

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435 7TH LANE SOUTHWEST
VERO BEACH, FL 32962-4718

I - YVONNE LARUE
1820 DAPPLEGREY LN
AUSTIN, TX 78727-4546

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251 E 51ST ST
NEW YORK, NY 10022-6534

I - ZABRINA LEITH
526 BROAD ST
526 BROAD ST, NJ 08010-1504

I - ZAK RAINES
77 BLARE CASTLE DRIVE
PALM COAST, FL 32137-7380

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SPOKANE, WA 99203-4007