

**American Rivers * Coalition for Alternative Wastewater Treatment
Clean Water Network * Colorado Watershed Assembly
Corps Reform Network * Institute for Agriculture and Trade Policy
Minnesota Ornithologists' Union * National Wildlife Federation**

August 9, 2010

Aaron Snyder
Corps of Engineers Planner and Project Manager
180 E. Fifth Street, Ste. 700
St. Paul, MN 55101

Re: Comments on Draft Feasibility Report and Environmental Impact Statement on the Fargo-Moorhead Metropolitan Area Flood Risk Management Project on the Red River of the North. These comments are in addition to comments that organizations may be sending individually.

Dear Mr. Snyder:

The Corps of Engineers, in its efforts to identify and implement a solution to flooding of Fargo, ND and Moorhead, MN, has a tremendous opportunity that could change the very direction of water management in the Sheyenne and Red River Valley, and potentially catapult U.S. Water policy out of the 19th century and into the 21st century. By departing from the traditional structural approach diversion canal favored in the draft EIS, and instead fully-evaluating and implementing a more modern restoration solution, such as the Waffle approach developed by the University of North Dakota's Energy Environmental Research Center, the Corps of Engineers can solve the flooding issues in these communities at a fraction of the cost, while generating ancillary social, economic, environmental and public health benefits.

Fargo, North Dakota and Moorhead, Minnesota have always been threatened by flooding from the Red River of the North. In the last two decades, however, floods have become more frequent and more severe because of a combination of a changing climate and the drainage of thousands of wetlands throughout the Red River Basin. The traditional approach of mitigating this flooding recommended in the draft EIS would ditch and move water off the land as fast as possible, only to create more problems down-stream. The DEIS recommends building a 36-mile-long, 100 – 300 ft. wide, \$1.4 billion diversion canal around Fargo/Moorhead.

The undersigned organizations have serious concerns about this currently-recommended approach because the diversion canal will change sedimentation in the 5 rivers it would cross, including the North Branch, Rush, Maple, Sheyenne and Wild Rice, adversely affect fish spawning and impact more than 200 acres of wetlands, while only providing an inadequate measure of flood protection for Fargo and Moorhead. All other downstream cities and communities will not receive flood protection, and will likely see more flooding due to increased water flow from the diversion channel.

Rather than mitigating flooding through the construction of yet another traditional, structural approach, the undersigned organizations urge the Corps to fully analyze upper basin storage options, like the Waffle approach. The plan is simple – the Waffle uses micro-basins or preexisting areas, such as depressed agricultural lands bordered by raised roads, for short-term water storage. One square mile, one foot deep, would store more than 200 million gallons of water. The combination of the waffle concept and wetland restoration would provide a long-term, environmentally beneficial flood protection plan. This watershed approach would provide basin-wide flood protection, produce positive environmental benefits, recharge the aquifer, improve water quality, and create recreation opportunities. According to EERC (<http://www.undeerc.org/waffle/>), not only would such a system reduce the flood crests by as much as seven feet, it would also provide sustaining economic benefits to participating landowners, while also improving water quality and providing fish and wildlife habitat. Wetland restoration will provide important habitat for migratory birds, improve water quality, and increase recreational opportunities.

We therefore urge the Corps, in a Supplemental Draft EIS, to:

- Develop an integrated, basin wide evaluation of flood damage reduction and better water management strategies;
- Develop an alternative that evaluates the use of wetland restoration as a primary tool for flood management - this evaluation should consider various levels of wetland restoration, including restoring 100,000 acres and 250,000 acres;
- Develop an alternative that combines wetland restoration with other water retention strategies, such as the Waffle concept and the other watershed approaches, such as the Red River Basin Commission Flow Reduction Strategy.

Supplementing the DEIS with this information is also required by the National Environmental Policy Act, which requires the Corps to adequately evaluate reasonable alternatives, which include the aforementioned and other non-structural and flood storage project alternatives. *See* 42 U.S.C. § 4332(C) and (E) (federal agencies must “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves conflicts concerning alternative uses of available resources”).

This project, if designed properly, could be the pivotal point in a transition to a real watershed and integrated approach to our water resources challenges. Getting this project right can make the way for other enlightened solutions to the nation’s water resource challenges that meet the classic triple bottom line of sustainability: social, economic and environmental performance.

Sincerely,

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