

November 7, 2011

**VIA U.S. MAIL AND E-MAIL (terryl.l.williams@usace.army.mil)**

Headquarters, U.S. Army Corps of Engineers  
ATTN: CECW-P (IP)  
7701 Telegraph Road  
Alexandria, VA 22315-3860

Re: Comments on Final Feasibility Report and Environmental Impact Statement on the Fargo-Moorhead Metropolitan Area Flood Risk Management Project on the Red River of the North

Dear Ms. Williams:

The following are comments from the Minnesota Center for Environmental Advocacy (MCEA) on the Final Feasibility Report and Environmental Impact Statement on the Fargo-Moorhead Metropolitan Area Flood Risk Management Project on the Red River of the North (FEIS). MCEA is a Minnesota non-profit environmental organization whose mission is to use law, science, and research to protect Minnesota's wildlife, natural resources and the health of its people. MCEA has statewide membership. For more than 10 years, MCEA has been actively involved in numerous efforts to reduce flood damages in the Red River Basin.

We have followed the process and reviewed draft document prior to publication of the FEIS. We are familiar with the substantive comments provided by Minnesota Department of Natural Resources (MN DNR) on August 6, 2010, January 24, 2011, and June 16, 2011 and endorse them, herein. We are also aware that MN DNR has a number of remaining and additional legitimate concerns with the FEIS including the benefit:cost analysis, effects of the diversion and water staging on sediment transport and geomorphology upstream and downstream of the project area, and fish passage. We believe that these areas of concern warrant further clarification before this FEIS can be considered complete.

We also have the following additional concerns with the FEIS:

- The modified locally preferred plan (LPP) includes storage of 200,000 acre-feet immediately upstream of the diversion structure. Adding this option to the plan reduced the size of the diversion channel from 35,000 cfs to 20,000 cfs. No consideration or analysis is given for the potential effects that additional upstream storage would have on reducing the size of diversion channel needed to achieve flood damage reduction goals. Numerous efforts are ongoing to retain water upstream of Fargo-Moorhead that will reduce the size of diversion channel needed (e.g. Bois de Sioux watershed districts projects, \$10 million available for wetland reserve program targeted to floodwater retention).

- The FEIS includes new operational details that have not been adequately described or analyzed. Related to fish passage, the FEIS now states on page 274:  
*“To further improve the potential success of the fish passage channels under the LPP, several options will be considered. This could include installation of additional gates to provide additional fish passage channels that would function across more of the hydrograph. It also could include methods to reduce the amount of staging needed, or the duration of time staging is needed, for the LPP. It also could include options to pass additional water through the metro area, above 9,600 cfs at Fargo. This would allow the project to operate less frequently, and potentially require staging less water, which could help mitigate the impact on fish.”*

This paragraph leaves the door wide open for significant and previously unidentified changes to the LPP. Passing more water through the metro area will likely require additional levees in town. This option was determined to be not economically feasible in previous documents and appears to be a substantial enough change to be considered a new alternative that needs complete analysis.

Thank you for the opportunity to submit these comments on the FEIS.

Sincerely,

**Henry Van  
Offelen**

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