

infrastructure. In addition, significant coordination would be required for operation of the storage sites. Sections 8.4.2 and 8.4.3 of Appendix O of the FEIS contain more information on wetlands and grassland restoration measures.

### **A-18 Storage and Wetlands/Grasslands Restoration Alternatives Improve Environmental Quality and Benefit Wildlife**

Many comments asked the Corps to consider the environmental quality improvements that could be provided by storage and wetlands/grasslands restoration alternatives. Wetlands and grasslands provide habitat for migratory birds, fish, and other wildlife; they improve water quality and decrease storm water runoff; and they contain a variety of native plant vegetation. In addition, wetlands play a role in water supply as they recharge ground and surface waters. Storage and wetlands/grasslands restoration alternatives could provide opportunities to improve environmental quality. Viable wetlands could also bring in tourism dollars to help boost the regional economy.

#### **Response:**

Section 8.4.3 of Appendix O of the FEIS considers flood storage alternatives. Flood storage opportunities and wetland and grassland restoration opportunities do exist, and with the right operational scheme, storage impoundments could improve environmental quality. Flood storage alternatives could be effective basin-wide and produce cumulative benefits basin-wide. However, these measures are not the most effective or efficient measures to reduce flood risk to Fargo-Moorhead. Any combination of flood storage systems would be costly and relatively ineffective at addressing the flooding problems in Fargo-Moorhead.

### **A-19 Flaws in Benefit/Cost Analysis**

The process used to analyze costs and benefits is flawed. The negative effects are minimized, the recreation benefits are exaggerated, and the death projections are unrealistic.

#### **Response:**

The economic analysis presented in the FEIS uses the standard methodology prescribed by the Water Resources Council's "Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies" and the Corps of Engineers' Engineer Regulation 1105-2-100. Recreation benefits are not used to justify the flood risk management features of the project, but the economic analysis of recreation benefits is included to show that recreation features are economically justified as additional features. Loss of life is not monetized or included in the economic benefits presented in the FEIS.

### **A-20 Solution to Red River Basin Flooding Problems**

The project does not even guarantee to solve the Red River Basins catastrophic flooding problems.

#### **Response:**

There is no measure that can guarantee to solve flooding problems; however, existing data and hydraulic modeling indicate that the LPP would substantially reduce flood risk in the Fargo-