

10/22/2015

Comments: Minnesota DNR draft EIS Fargo-Moorhead flood management project

To: Minnesota DNR

Thank you for allowing public comment regarding this document. Also, thank you for resisting pressure and for ensuring there is public discussion and input on issues such as this project. I am writing as a citizen who will be directly affected if the project is approved and I hope you will take my concerns seriously. First, let me explain who I am, and then I will briefly organize the comments I have.

I am the owner of a small farm located on the Minnesota bank of the Red River between Comstock and Wolverton, about 18 miles south of Moorhead. I am the 4th generation here. My great-grandparents bought a cabin at Fort Abercrombie after it closed in the late 1870's and disassembled it and floated it down the river to their land, where they reassembled it and lived and raised 10 kids until they could build a big house in 1902. My grandfather built his place 1/2 mile away in 1919. He remembered Indians riding along the river as a boy, and described the Red as a clear running gravel bottom river until the 1930's. Later, I came to own his farm. It consists now mostly of woods along the river for about 2 miles. My great grandparents and grandparents lived their whole lives along this river, and I have numerous relatives along the Minnesota side. My great-grandfather's brother started Concordia College in Moorhead. I grew up in south Moorhead a block and a half from the river and was down there almost every day as a kid. My paper route was on Rivershore Drive (now torn down for flood control and replaced with a dike). I graduated from Moorhead High and from Concordia College with a degree in biology. One summer I worked collecting and doing the microbiology testing on water samples from various USACE controlled sites in the area from Lake Traverse to Fergus Falls to Moorhead as part of a study for USACE. My point in all this is to tell you that I am very familiar with the Red River both in town and out in the area which will be "newly inundated". I am also familiar with both communities of people. Therefore, I hope you will give my comments some credence. Fargo- Moorhead, the farm, and the river have each always been a big part of

my life. I love the river and both communities.

General Criticism of DNR draft EIS:

This exhaustive document appears to be quite comprehensive, but in fact has numerous areas where it lacks detail and information about how various conclusions were arrived at, especially where judgments were made as to appropriateness of alternatives based on workability, engineering, cost data, etc. The reader is left to "trust us". It also lacks serious analysis of potential unanticipated adverse effects. The DNR states it was working closely with the USACE and the Diversion Authority throughout development of this document, and in many cases accepted their earlier work and incorporated their data rather than develop it independently on their own, and it shows. This, in my view, causes some problems, as both the **USACE and the Diversion Authority are interested parties and are not just interested in flood control**. They are interested in flood control that maximizes economic development for Fargo. Furthermore, neither group carries any substantial credibility in the area of environmental concern, and this bias not surprisingly shows through in the DNR's report. Being a Minnesota citizen, I would have expected much greater environmental scrutiny from the Minnesota DNR over this project, and a much closer look at alternatives, as well as a recognition that the best solution for the Fargo flooding problem may not have even been discovered yet. Fargo and the USACE have long been certain their plan is the only best one, that they are the "big town", and that they should get what they want. DNR has been cautious about a class one dam on a major river system. To their credit, DNR has at least considered some of the downside of this project in their report, but they could have said a lot more about why that is prudent. An ideal plan would control flooding without the environmental risk and social cost of the USACE plan, and has been achieved by other cities along this river without a dam.

Specific Comments re: Environmental Data

1. The DNR shows the federal/USACE environmental reports rating all the rivers in this project to be of only fair to poor quality, using a QHEI survey instrument. Thus, by inference, they **imply these streams are not really worthy of a serious analysis as to how this habitat will be degraded by the project**. This QHEI grading does not fairly describe these rivers, particularly the Red, which as the DNR knows and states in it's report is a "world class" fishing river, and home to 50 kinds of fish, and a wonderful population of wild creatures including things like snowy owls and otters and oysters. One then wonders how a "fair to poor" stream does this. The QHEI is meant to be used in the context of the region the waterway is in. While the Red is a prairie river and thus will never be like the Crow Wing, it never-the-less is a very healthy river outside of the urban area. The DNR's stream biologists all know this and the DNR should have pointed this out in it's report. It is not a resource that should be lightly regarded.

2. DNR EIS goes on to correctly note there are Significant Potential Adverse Effects from this project to riverbank structure, flood plain woods, fish, invertebrates, birds, wetlands, wildlife, cultural resources, and socioeconomics. The individual discussions and proposed mitigations are invariably weak, dismissive, and short on detail. The overriding feeling one gets is that "we don't really expect anything too serious", even though as noted above, just about everything in this ecosystem is going to be adversely affected. The report needs to at least look at the worst case possibilities and list them, and discuss what happens if they start to snowball.

3. My greatest specific concern involves the Flood Plain Woods and transitional forest. Again, the federal/USACE report only lists 62 acres of woods at risk. (probably right where the dam will be built.) The reality is that the woods from the dam half way back to Breckenridge could be badly damaged by higher, deeper, or more prolonged flooding. These are lovely old woods: ash and basswood close to the river, and oaks further back. The oaks particularly are at risk with **deep or prolonged flooding. In a worst case scenario where the diversion needed to be run for several weeks, or multiple times, or in warm weather, the entire flood plain forest could be wiped out, and all the creatures it shelters as well, driven out in a stressed condition onto the prairie.** Over the course of the lifespan of this dam, it is almost inevitable that at some point such a scenario will arise. This should be considered by the DNR in this report. Evidence should be sought, if any exists, from other projects of this scale where the USACE has successfully implemented this kind of project to see what the upstream effects were on the Flood Plain Forest.

4. The human environment in the "unbenefited" area is also correctly identified by the DNR in this report as an area that will suffer significant damage. This will be cultural, economic, and social, as people are dispersed from the area they've lived in their whole lives, extended family ties are lost, school districts and churches are eliminated or altered, tax bases are destroyed, farming on thousands of acres of the best farmland in the country is disrupted, other businesses go under, and communities are expected to live behind ring dikes. The DNR also incorrectly surmises that people will move in to these ring diked villages. Many of those that I know that are uprooted will leave for a different state or location where this cannot happen again, and a check from the government will not particularly make them feel better about it. In my own case, I doubt I can find this kind of farmland along a river full of fish with 2 miles of beautiful woods that my great grandfather used to own 20 minutes from town and surrounded by friends and family for what the government would pay for it. That combination is not really replaceable. Many others are in the same situation. The DNR could certainly recognize this dilemma, and it's unique character better in it's report. These impacts are serious, and there's hundreds of Minnesota citizens who will be so treated. There are also likely to be impacts continuing upstream far out of the project area that go unmentioned. It is interesting that there is supposed to be protection for premier farmland from such projects, but it is simply bypassed by USACE because over 90% of the farmland in this area is premiere farmland. Disingenuous?

Other recommendations for the DNR before deciding to consider permitting this dam

1. Please consider the best interests of all the taxpayers in Minnesota who would have to pay the bill for part of this project with little benefit and significant environmental loss. They are unbenefitted.

2. Consider that other major cities (including Moorhead) have solved their flooding issues without dams. Fargo likely could as well with dikes and/or a diversion alone and in town mitigation.

3. Please consider that at least some of the pressure from the Fargo Diversion Authority comes as much for political and economic development reasons as for flood control. Fargo seems to care little for the river. It's a nuisance to them. Condos and strip malls in the flood plain generate \$. This project will give them flood control and lots of new ground to develop, and it **will be paid for by others, with little or no suffering by anyone in town. OF COURSE THEY WANT THIS PROJECT!**

4. A solution to Fargo's flooding problem that actually enhanced the Red River and the wild area it supports would be the best of all solutions for everyone, and if the will existed could be done!

No state action significantly affecting the quality of the environment shall be allowed, nor shall any permit for natural resources management and development be granted, where such action or permit has caused or is likely to cause pollution, impairment, or destruction of the air, water, land or other natural resources located within the state, so long as there is a feasible and prudent alternative consistent with the reasonable requirements of the public health, safety, and welfare and the state's paramount concern for the protection of its air, water, land and other natural resources from pollution, impairment, or destruction. Economic considerations alone shall not justify such conduct."

Lastly, please talk to your DNR river biologists who have been down on this river. It is a really pretty wonderful in its own unique way.

Thanks.

Dave Ness