

TO: MRRP Management Plan Team and MRRIC HC Ad Hoc Group

FROM: Independent Social Economic Technical Review (ISETR) Panel

RE: ISETR Follow-up Comments to Agency Responses to ISETR May MRRIC Meeting Comments Presented on July 13 HC Ad Hoc Group Call

DATE: July 17, 2015

ISETR would like to thank the COE for their thoughtful and thorough responses to our comments. The COE responses helped provide ISETR with valuable insights on where the COE is in the analysis process, the analysis constraints the COE faces, and when certain types of analyses will be performed.

We had a few follow up comments: Our major point is that by pursuing some of the work we proposed now, as opposed to later, the COE could better use the results to Design the Alternatives, and not just to Evaluate Final Alternatives:

1. We suggest that the COE
 - a. Utilize estimates of cost per acre for mechanical construction as an input into designing cost effective bird recovery alternatives. It is ISTER's understanding that estimates of costs per acre and in total have been developed. If even a rough cost per acre is known, this can be applied to "cost out" the all-mechanical and partial-mechanical alternatives to determine the most cost effective way to meet the bird targets.
 - b. Consider a wide range of alternatives for mechanical habitat. The COE's response to ISETR comments indicated that NEPA does require the COE to develop and consider a wide range of alternatives, even those outside of the COE's immediate area of authority. In the spirit of considering a wide range of alternatives ISETR recommends that the cost of mechanical construction of habitat be estimated for: (a) in the riverine channel and (b) outside of the riverine channel.

2. In response to our concern about a rainfall event that occurs after a release that might exacerbate downstream flooding in the period before the COE can halt the release, the Agency's response is that "*We recognize this scenario would result in an increased risk of higher stages downstream due to travel time between Gavins Point and the downstream locations.*" The COE then proposed to evaluate this risk "*...if any of those options proceed further within the Management Plan study.*"

We suggest that this additional modelling be performed now so that it can inform the Proxy process. As the Proxy results are currently constructed, there is no additional flood risk. This outcome is not intuitive and it is a result of the assumptions that were made. An analysis that includes the flood risk described above would allow for a more informed Proxy process. Section f of the COE response to this concern states "The Management Plan HH PDT will prepare a response paper that further evaluates

ESH creation releases in more detail.” The panel urges this be completed in time to inform the proxy process.

3. We understand from your response to our comment number 11, and from further clarification from Kate Buenau, that the land not recovered from the 2011 flood generally is downstream from the current plover nesting range and that there likely is little current use of such lands or off-channel but nearby areas such as gravel pits by the birds along the Missouri River. Given continued stakeholder interest in the possibility of such off-channel use of such sites by the birds, and an apparent cost benefit for use of such sites, we urge the Corps and FWS to issue a definitive assessment of why such areas should not be further considered for bird habitat, and/or continue evaluation of actual and potential use of such sites as part of the adaptive management process to be proposed. Perhaps the referenced FWS response to come will do this.
4. In our comment 14 we provided an example where there was a 1 day increase in days above flood stage in one scenario and a 1.3 day increase in a second. This was then rounded to 1 day in each scenario. Our suggestion was to report the differences across scenarios in percent terms. In our example this would cause flood risk to increase by 30% rather than the zero that is reported. We still think the rounding process may be masking some useful and significant information.