



THE WILDLIFE SOCIETY
North Dakota Chapter

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P.O. Box 1442 • Bismarck, ND 58502

U.S. Army Corps of Engineers – Omaha District
North Dakota Regulatory Office
3319 University Drive
Bismarck, ND 58504-7565

RE: Public Notice NWO-2015-00669-BIS
City of Horace River's Edge Development Project

Dear U.S. Army Corps of Engineers – Omaha District personnel:

The North Dakota Chapter of The Wildlife Society (NDCTWS) appreciates the opportunity to provide comments on the proposed City of Horace River's Edge Development Project and its impact on existing wetlands habitat. The mission of the NDCTWS is to inspire, empower, and enable current and future wildlife professionals to sustain healthy wildlife populations and habitats in North Dakota through science-based management for the benefit of all.

The applicant proposes to construct a 165-acre residential housing development that features 330 residential lots and, also, includes the construction of a storm water retention pond that will outlet into the Sheyenne River. All 165 acres of the proposed project are currently in agriculture production. This proposed residential development will require the filling and leveling of 7.85 acres of wetlands habitat. Fill material generated from the excavation of the retention pond will be used to embank roadway subgrades and as backfill around future house foundations. A total of 8.56 acres of farmed wetlands are present within the project area and will be negatively impacted by this proposed project.

Since this acreage will become high density residential housing with a small and deep, storm water retention pond, any wetland mitigation efforts on site are not possible. The surrounding landscape includes additional residential housing and agriculture production fields, which would, again, prevent any nearby wetland mitigation action. Because there is not wetland mitigation opportunity near the project location, we would recommend that the applicant be responsible for wetland mitigation work at a location(s) in southeastern North Dakota. Since wetland mitigation is not possible near the impacted wetlands habitat, and irreparable damage will occur to the entire 8.56 acres of wetland habitat located on the project area, we suggest and strongly recommend that wetland mitigation be 2X the wetland acreage impacted negatively by the city of Horace River's Edge Development Project or 17.12 acres of restored, enhanced or created wetland habitat. The applicant has proposed to purchase credits from the North Central Mitigation program at a 1:1

ratio, but since the full 8.56 acres of wetland habitat on the project area will be destroyed and become non-functional, we strongly encourage that a 2:1 mitigation ratio be required. We also recommend that a grass buffer along the Sheyenne River between the housing development and the river be maintained by the developer to allow stream migration.

The North Dakota Chapter of The Wildlife Society thanks you for the opportunity to offer comments on this proposed housing development project.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Rachel Bush', with a long horizontal flourish extending to the right.

Rachel Bush
President, North Dakota Chapter of The Wildlife Society