

U.S. Army Corps of Engineers:

Upon attentive review of the proposed Fargo-Moorhead, "locally preferred" diversion plan, I have come to question not only the economical and environmental impacts that the plan imposes upon our region, but furthermore the ethical issues that will arise if this endeavor is to be carried to completion.

As a lifelong resident of the Fargo-Moorhead area and a student at North Dakota State University, I feel it my innate duty to call to attention the shortfalls that the U.S. Army Corps of Engineers' ND 35K diversion plan entails. In a time of national economic distress, it is not logical nor is it reasonable to burden a region with funding such an expensive project when THERE ARE more cost effective solutions available. It has been shown (in your own reports) that alternatives, including the proposed MN federally preferred plan are much more economically viable. After speaking with a local engineer, I have been informed that Fargo is already beginning to implement floodwall protection, which will protect the city to a water level of 44 feet. It is preposterous to even consider building a 36 mile long diversion, costing billions of dollars, to add only 2 feet of protection (a 500 year flood event calls for protection to 46 feet) to our area. When the city is already capable of protecting its citizens through the use of more practical solutions, there is NO NEED to ultimately WASTE money on a project that may or may not be used for consecutive years. What is the economical reason to go through with this horrendously expensive project when our city will be protected to 44 feet without it?

In conjunction with its economic infeasibility, environmental risks of the "locally preferred" plan are inevitable. Rechanneling rivers will induce habitat changes for various wildlife, including native fish and deer species. The National Wildlife Federation, Minnesota Conservation Federation and South Dakota Wildlife Federation have released statements addressing their similar concerns. On top of the loss of wildlife, agricultural practices will be devastated in the nearly 55,000 acres of affected water staging areas. Agriculture accounts for a substantial source of revenue in both North Dakota and Minnesota; by holding water upon 55,000 acres of land, not only will this land become useless to the farmers who rely on it to make their living, the states as a whole will take a hit. Corps leaders have stated that this water will have no affect upon farming. This is NOT TRUE in the slightest. Coming from a farm family, I am familiar with the negative effects that water staging will have on the families, farmland and rural communities in the water staging zone. The already heavy, clay filled soil found in such North Dakotan and Minnesotan fields will become super-saturated, filled with debris and rendered fruitless. Problematic crop insurance issues will arise. Organic farmers will lose their certification. A one-time mitigation, as proposed, will not even make up for one years' worth of a farmer's crop production. If water is to be staged at a level near 30 feet (as stated by an Army Corps representative with whom I spoke), affected fields would have been underwater for TWO MONTHS this past spring/summer; talk about purposely ruining the MOST FERTILE land in the nation while underpaying landowners. The environmental risks in concurrence with this plan are irreversible.

Finally, and perhaps of most concern are the ethical matters brought about by the proposed diversion. It is UNJUST and IMMORAL to flood and buy out the rural communities of

Comstock, Oxbow and Hickson (among others), to provide flood protection to the soon to be protected (with 44 ft floodwalls) metropolitan area of Fargo-Moorhead. To flood land that has never before been flooded, to evict homeowners who have done nothing to assist in the stupidity of building homes along the river (homes which should never have been built in the first place because they are in the KNOWN FLOOD ZONE) and to tax these citizens in order to pay for the diversion is BEYOND belief. Recently, Fargo city officials inducted a building moratorium, stating that building permits will be required to build in zones located in the flood plain (within 450 feet of a river); this is a step forward. By continuing with buy outs along the river, controlling where new construction can and cannot occur and building 44 foot flood walls, there is no reason why Fargo should not be able to protect itself without the aid of a diversion.

The Red River Valley is a great place to live. It is filled with rich heritage, culture and customs, most of which originated from our agriculturally based, homesteading immigrants. By flooding and refusing to relocate the cemeteries of Comstock and Hoff, among others, not only will you be showing *my own* relatives an unfathomable disrespect, you will undeniably demonstrate your ignorance of all that these people have done for the Fargo-Moorhead region. It would not be questioned to relocate a Native American burial ground. Homesteading immigrants deserve the same amount of respect as such native populations.

In summation of the above stated, it is uneconomical, environmentally unfriendly and highly unethical to proceed with the proposed diversion plan. I do not deny that the Red River Valley needs flood protection; I have stood in flood lines and assisted both friends and relatives in sandbagging their homes over the past three years and know the importance of protecting our city. Let's protect EVERYONE'S homes and livelihood. The needs of the few are as important as the needs of the many. Sacrifice will be inevitable, however the sacrifices that you have bestowed upon the affected regions are too much to ask of an undeserving people. This is not the Hoover Dam. We are not utilizing previously unusable land to design a useful structure. We are taking USEFUL land to build an UNNECESSARY structure.

It's time to set a precedent: It is time to be economical. It is time to protect the environment and to defend nature's resources. It is time to consider the consequences of this plan before planning the "recreational activities, park benches and shrubs" that the project will bring to our community. It is time to reconsider the proposed diversion plan. The U.S. Army Corps of Engineers is known for its dedication, reliability and state of the art, innovative structures. If your team does not realize that there are better alternatives to assist Fargo-Moorhead, a community that is already working toward protecting itself, then you have lost sight of your goal.

Thank you for your consideration.



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