

Headquarters, U.S. Army Corps of Engineers,
ATTN: CECW-P (IP),
7701 Telegraph Road,
Alexandria, VA 22315-3860

Fargo-Moorhead Metropolitan Area Flood Risk Management Project Final EIS

RE: Loss of Life

The “loss of life” probability assessment contained in the FEIS main report, July 2011 Appendix D Attachment 1 and Attachment 2 are deficient.

Preservation of “life” should be the paramount focus in any and all flood mitigation efforts. However, the SDEIS and FEIS contain excessive postulation to preserving Fargo, ND as an economic engine for the region. Fargo, ND (as indicated on page 298 of Appendix O) has driven the alignment location and excessive flood mitigation for primary economic development of Fargo, ND.

(page 11) Appendix U | A-19 response

Loss of life is not monetized or included in the economic benefits presented in the FEIS.

(page 13) Appendix O - 4.3 Phase 1 Key Assumption

Loss of life was not considered as part of the initial economic analysis. The vertical team requested that a loss of life analysis be completed to supplement the Other Social Effects (OSE) account, but no dollar value was to be placed on the loss of life.

Specific Loss of Life Deficiencies

The FEIS and/or Appendix D Attachment 1 and Attachment 2 do not adequately reflect or offer corollary for “loss of life” as it pertains to the current LPP or FCP.

- does not contain adequate benchmarks
- does not contain projections adjusted to population growth
- does not adequately illustrate differences between temporary or permanent flood protection
- does not contain metrics relating to population density for inundations of areas removed from flood plain
- does not address evacuation complicated by permanent flood protection
- does not reflect geographical complications presented for emergency evacuation
- does not reflect augmented loss of life induced by permanent flood protection

Flood control consists of physically altering the floodplain to reduce the danger of a flood. However, the current LPP fails on two counts. 1) the flood plain is altered in such a way as to increase the danger of flooding in areas outside the project area, 2) the staging area presents a greater threat to the city of Fargo, ND due to excessive water levels held above the elevation of the entire city on historically unstable ground.

Page 60 of Appendix D: The USACE assumes that *"98% of the population would evacuate upon receiving the warning of imminent levee failure."* However, the USACE does not make a distinction between temporary or permanent levee failures. It only suggests that emergency levees would increase the loss of life potential.

It is generally accepted that populations that have permanent protection in place are less likely to evacuate because the flood protection offers an unwarranted sense of security that does not reflect a true flood risk specific to the given area. At greater risk are those population(s) that live in areas that were previously flood plains that have been developed due to permanent mitigation structures.

Further study and accurate risk assessment relating to "loss of life" is needed, as the current FEIS main report, July 2011 Appendix D Attachment 1 and Attachment 2 are deficient.



Marcus E. Larson
513 7th St
Hickson, ND 58047
701-588-4412

2011-11-07