

David Zumeta

The Ford Area C Feasibility Study is fundamentally flawed in that it included only an analysis of a 100-year flood event as opposed to including both a 100-year flood event and a 500-year flood event. I did a Google search asking the question: "When would a 500-year flood analysis be performed?" The AI-generated answer, based on multiple federal government sources, is as follows:

"A 500-year flood analysis - which model a flood event with a 0.2% chance of occurring - is generally performed to assess risks for critical infrastructure, comply with federal regulations for specific projects, or update flood maps to reflect lower-probability, high-consequence events.

Key scenarios requiring a 500-year flood analysis include...

- * Critical Infrastructure & Storage: Areas involving the storage of hazardous or contaminated materials are often regulated to the 500-year flood elevation....

- * Climate Change Assessment: As climate change increases flood risks, 500-year analyses are used to understand how extreme events may become more frequent."

By not analyzing the potential impacts of a 500-year flood event, the Feasibility Study did not adequately evaluate the risks of such an event potentially causing severe erosion, downstream sedimentation, and release of contaminated and toxic materials into the Mississippi River, with potentially adverse impacts on water quality, human health, and fish and wildlife habitat. Given the increasingly severe extreme precipitation events occurring in Minnesota in recent decades, the likelihood of a flood event exceeding the 1965 flood levels in the Twin Cities in the next 30 years is considerably higher than one percent.

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