

Aaron Carlson
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October 31, 2011

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

Dear Sir or Madam,

I am writing to inform you that some information in Appendix G - Real Estate of the Fargo-Moorhead Metropolitan Area Flood Risk Management Final Feasibility Report and Environmental Impact Statement dated July 2011 (Final Report) is incomplete and therefore inaccurate. I am also including in this letter some concerns I have with values of land and property, ambiguity of wording in Appendix G, lack of language regarding payment of mitigation costs, and inconsistencies throughout the Final Report and other documents issued by the U.S. Army Corps of Engineers related to the Final Report. I would appreciate your written response to this letter.

I live one-half mile north of North Dakota State Highway 46 on Cass County Road 81 in the upstream staging area of the Locally Preferred Plan (LPP) of the proposed Red River diversion. As I review the maps on pages 19-22 of Appendix G, I am unable to locate the red dot that corresponds to my family's home. I am also unable to locate the red dots that correspond to my in-laws' home and a neighbor's home ½ mile north of us. My home and my in-laws' home were both built in 2008 and our neighbor's home was built in 2009. The two outbuildings on my in-laws' land were built in the early to mid-2000s and show up on the map, but none of the above mentioned homes. I submitted an online comment in the spring of 2011 voicing this same concern, but never received a response. I would like the Final Report to be amended to include a list of addresses for all residential structures, non-residential structures, and businesses included in the upstream staging area and Staging Area 1 of the LPP. I would like a response in writing from the Army Corps of Engineers that explains why these homes do not show up on the maps of the Final Report.

Page 12 of Appendix G shows a spreadsheet of costs for lands/damages incurred for upstream storage. I am concerned about the 'value/acre or site' column not adequately representing the value of my property. I am wondering if these values are hard numbers or ballpark estimates. Also, does the 'number of sites' column include our home, or, since we were omitted from the maps (as mentioned in the first paragraph) have we been omitted from this spreadsheet as well? I would appreciate a written response from you in regard to this question.

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There is ambiguity in the wording on page 6 of Appendix G of the Final Report regarding the mitigation measures of businesses. I am employed by KayJay Ag Services of Horace, ND and am hoping to become a shareholder in the near future. We perform agricultural research on a contract basis. We do not sell the commodities we grow, but rather are paid for the service we provide agricultural companies in collecting research-based data. This business is owned by my father-in-law and operates out of his home and the outbuildings located immediately north of my home; we grow crops for research purposes on the surrounding 67 acres my father-in-law owns. The wording on page 6, paragraph 3 says *"The proposed mitigation for the area is broken into two parts, one for homes, structures, and businesses and the other for agricultural lands. Impacted homes, structures, and businesses...with 1 to 3 feet of flooding would be considered for ring levees or a purchase....Impacts to agricultural lands in the staging area would be mitigated through the acquisition of flowage easements."* What happens when the land is a vital and necessary part of my father-in-law's incorporated business? Will someone pay to ring levee the entire 67 acres of land? The first part of the wording makes it sound like someone will, but the second part makes it sound like someone won't. I understand that a *"property-by-property analysis will be conducted to ensure that the specifics of each parcel are taken into account when determining the appropriate mitigation."*, but the language as written leaves room for interpretation over what mitigation measure would be taken. Will the mitigation measure chosen guarantee the successful continuation of this business? I would appreciate your written response to this question.

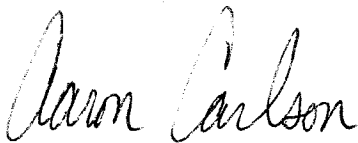
There is no language that I could find throughout the Final Report that address the issue of who pays for increased costs of living for those residents whose flood mitigation method is a ring dike surrounding their home. For example, I have never been required, nor desired, to buy flood insurance for the home we built in 2008. My home is not currently in the 100-year flood plain and, in fact, is not in the 500-year flood plain either. If my home is not bought out and a ring dike is the mitigation method chosen for my family, I would now desire (and probably be required by my mortgage company) to have flood insurance. Would the Army Corps of Engineers, or the Cities of Fargo and Moorhead, or Cass County pay for the flood insurance, or would I be responsible to pay for this new burden? Other items like paying for hard-wired emergency generators, boats or four wheelers for transportation during a flood event, raising my driveway, or perhaps even raising the level of my house, are items that I may require if the LPP of the diversion is constructed. Please include in the Final Report more information on how mitigation related expenses like these would be paid for. I would also appreciate your personal response in writing as to how expenses like these would be paid for.

I would also like to bring to your attention several inconsistencies listed throughout the various publications related to and preceding this Final Report.

1. In the document titled Fargo Moorhead Metropolitan Feasibility Study found at <http://www.internationalwaterinstitute.org/feasibility/Project_Description.pdf> the 'Background information' states that "Average annual flood damages are estimated at over \$65 million."
2. In the Alternatives Screening Document Fargo-Moorhead Metropolitan Area Flood Risk Management dated December 2009 page 2 under the heading '1.2 PROJECT BACKGROUND' the statement is made that "Average annual flood damages in the Fargo-Moorhead Metropolitan Area are currently estimated at over \$74 million."
3. Under the heading "Flood History" on page ES-4 of the Final Report the following statement is made: "Equivalent expected annual flood damages in the Fargo-Moorhead metropolitan area are estimated to be over \$194.8 million in the future without project condition."
4. The footnote of Table 1 on page ES-5 of the Final Report states "Expected average annual damages without a project were \$195.9 million."
5. The footnote of Table 5 on page 36 of the Final Report states "Note: Expected average annual damages without a project were \$73.7 million."
6. The footnote of Table 7 on page 62 of the Final Report states "Expected average annual damages without a project were \$77.1 million."

Please include in the Final Report the actual cost of damages for the Fargo-Moorhead Metro area for the floods of 1997, 2009, 2010, and 2011. This would provide a comparison between actual costs and estimated costs. Also, please include a statement listing the variables and their respective estimated costs for how "expected average annual damages without a project" were calculated. I would also appreciate your written response as to why there is over \$100 million in variability in estimating "annual damages without a project" throughout these documents.

There are other issues I have with this project as a whole, but, as they do not pertain to the Final Report, I will refrain from including them. Thank you for reading and considering my concerns/comments and I look forward to your written response regarding these points.



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