

November 5, 2011

Dear Project Manager:

We have identified areas of your latest environmental impact statement which we have concerns with that require additional attention and because of these cannot support your preferred plan.

Your latest EIS does not adequately address the issue of BASIN-WIDE flood risk management as a tool which needs to be incorporated into the plan. It needs to be examined as part of a comprehensive plan for flood control throughout the basin, not as a stand-alone option in a small part of the basin upstream of the F-M area. Only a basin-wide approach to flood management can leave all communities and farms intact. Less than adequate attention is given to flood storage within the entire basin, as well as grassland restoration and wetland restoration to solve flooding issues. The Red River Basin Commission plan can reduce flooding by as much as 20% within the basin and if all tributaries upstream of the Red River participate in this plan, flood protection for the entire basin can be substantial and also more cost effective than the LPP. Options for flood management with federal taxpayer dollars can and must protect all communities within the Red River Basin, not just the communities of Fargo-Moorhead.

There was no formal cost-benefit analysis done for the above option which we believe would show that that upstream STORAGE THROUGHOUT THE BASIN would give protection to all farms and communities within the basin at a cost very comparable to or less than the proposed diversion option while also benefitting more people and the environment. This option MUST BE EVALUATED before proceeding with your preferred option.

If a diversion is the only option given for flood protection for the area, the federally comparable plan is more cost effective and does not have as many harmful effects to the environment as the locally preferred option. This option needs to be re-examined if a diversion is the only option given for flood control for the F-M area.

If you examine lidar photography from the 1997 F-M flood event both before, during the event and after, you can see that the area that Fargo is currently developing and wants to continue to develop is land that is at a very low elevation and is subject to flooding. This area was completely covered with water during the 1997 flood event. The locally preferred plan is all about protecting a "future" Fargo and the land which Fargo wants to develop-it is not about providing flood protection for current Fargo-Moorhead which the much more economical Federally Preferred Plan accomplishes. This land should not be developed in the first place and the burden for this future development is being placed directly on the area upstream of the diversion in the water staging area, the federal government and the taxpayers This is immoral and should not be done. Also from this photography, you can see that Fargo did an adequate job to protect its infrastructure in its

developed area at this time. Much work has been done since 1997 to raise flood protection levels. Home buyouts in low-lying areas have been done and continue to occur along with raising flood wall protection to levels where both communities will have protection to a river elevation of 44'- a level which, when combined with basin-wide water storage, can and will protect current Fargo and Moorhead from future flooding events. Continuation with this plan as proposed is not needed and is a waste of federal taxpayer dollars--duplicating the flood protection which the F-M area is currently doing.

In your latest draft, on page 402, 5.5.2.5 it is stated that you may PASS MORE WATER THROUGH TOWN as a mitigation strategy. What are your plans for doing this? How much additional water are you planning on moving through town? If the F-M area has flood protection levels with flood walls to as high as 44', WE DO NOT SEE THE NEED FOR THE WATER STORAGE area upstream of the metropolitan area. You should be able to make the DIVERSION CHANNEL SMALLER than previously planned if the F-M area has the capability of moving water levels of 40 or more feet through town. The flood walls which are currently under construction were previously stated to be too expensive to do, but yet, are being done anyway. This lessens the overall need for the diversion and at the very least requires downsizing of the current locally preferred plan. Because of the possibility of this increased flow through town, and a WHOLE NEW PLAN being implemented, further analysis as to the size and scope of the locally preferred plan must be done. FURTHER ANALYSIS OF THIS NEW ALTERNATIVE MUST BE DONE!

Also in this draft you state that the only real impacted agricultural lands are the approximately 6500 acres that will be used for the diversion channel itself stating that the other lands will still be able to be used for agricultural purposes. Being one of at least 4 farmers in this staging area who farm organically, we will all LOSE our ORGANIC CERTIFICATIONS. The total acreage that the 4 farms will lose organic certification on is almost 5,000 acres of this 50,000 or 10% of the area. How will you handle this? This is not insignificant to us! Furthermore, all farms in this staging area will LOSE the ability to obtain Federal Crop INSURANCE for WATER events due to flooding and not be able to obtain prevent planting on these acres either. This will DIMINISH the property VALUATIONS on all farmland within the staging area and in years when water staging occurs a CROP may NEVER BE PLANTED on these acres or RUINED DURING THE GROWING SEASON. How can you say that this land will still be continued to be used for agricultural purposes and that the staging of water on them is not significant?

The latest draft does not adequately address many of the GEOMORPHIC ISSUES upstream of the dam. More analysis must be done to determine what effects the dam structure will have upstream on how water storage will change the surrounding landscape over time and what issues will arise from them.

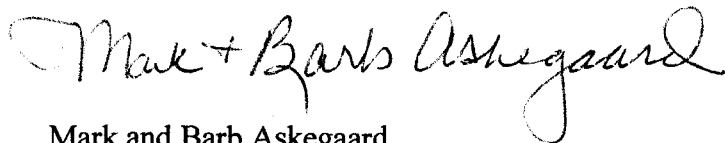
Adequate analysis of impacted areas upstream from the water staging have also not been addressed sufficiently and their appropriate costs have not been stated. After consultation

with a private engineering firm, they believe that the areas that will be impacted are much more comprehensive than stated and that all costs have not been revealed.

The main drivers behind the LPP is the city of Fargo and the state of North Dakota's congressional delegation. This plan's main benefactor is the city of Fargo. They chose this plan. If the LPP plan is chosen, we should not be using federal tax dollars to do it. It is a plan which as stated in the corps minutes is more expensive and does more environmental damage than any other option given--it just removes more land from a flood plain for Fargo's future development. At a time when our country faces many challenges, many of them being financial, we CANNOT and SHOULD NOT use federal taxpayer dollars to fund a PROJECT which is the MOST EXPENSIVE and MOST ENVIRONMENTALLY DAMAGING.

For the above stated issues, WE URGE YOU TO REEXAMINE YOUR MOVING FORWARD WITH THE LOCALLY PREFERRED PLAN AS BEING PROPOSED and readdress the need, size and scope of the diversion channel as well as the proposed water storage area.

Thank you for considering these comments and we look forward to your addressing these concerns as well as the need, size and scope of this plan.

A handwritten signature in black ink that reads "Mark + Barb Askegaard". The signature is written in a cursive, flowing style.

Mark and Barb Askegaard  
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