



COUNTY PLANNING & ZONING DEPARTMENT

913 SOUTH DUBUQUE STREET, SUITE 204

P O BOX 1350

IOWA CITY, IA 52244

PHONE (319) 356-6083

FAX (319) 356-6086

RICHARD J. DVORAK
Planning & Zoning Administrator

R. J. MOORE AICP
Assistant Planning & Zoning
Administrator

Date: July 25, 2000

To: Johnson County Board of Supervisors

Re: Staff Response to Environmental Assessment
Application for MYCA Real Estate Lease

As you are aware, the U.S. Army Corps of Engineers has contracted with Zambrana Engineering Inc. to conduct an EA (Environmental Assessment) analysis for a proposed real estate lease application by MYCA (Muslim Youth Camps of America). Part of the EA study process to evaluate the proposed *Camp Horizon* includes assessing potential impacts on residents and on the natural environment. The EA document also considers various alternatives to the current MYCA proposal. The alternatives are: 1) *acceptance of the MYCA proposal*; 2) *rezone the area to low density recreation or reserve forest so it would no longer be available for lease, and structures would be removed*; 3) *solicit applications for a non-profit lease at a reduced level of use*; 4) *take no immediate action, leave the site in its current state and consider other non-profit applications*.

Based on the information gathered by the County, it appears that this site may not be compatible with surrounding land uses, resulting in possible significant negative impacts for the area. One of the primary concerns the County has with this application is the potential for detrimental effects on the existing road network serving the area.

Beyond road infrastructure issues, there are additional burdens placed on emergency services including sheriff, fire and ambulance protection. Environmental impacts as a result of this development also need to be examined more carefully. The clearing of trees and vegetation has been proposed and will occur if the application proceeds, but it is unclear as to what extent. Finally, some of the 106-acre site is within the floodplain, and may limit the placement of buildings on the site.

In addition to environmental concerns, socio-economic impacts of having residential development within close proximity to a development of this scale could result in negative externalities accruing to surrounding homeowners. These externalities may be manifested by increased noise levels due to both camp operation and construction. Additional noise and light effects due to possible hours of operation may also need to be considered. In addition, area

residents may also experience a reduced ability to access this property (it is unknown whether MYCA will grant access to area residents, or, if access is granted, what limitations on access may be attached). There is also the potential for property owners in the adjacent area to experience property value diminution. While this can only be determined by analyzing historical property value data, this claim has been advanced by some of the adjacent property owners.

Perhaps the strongest argument against the proposed lease arrangement with the MYCA is the incompatibility with existing plans and adopted policies that guide all land use decisions in the county today. The 1998 Johnson County Land Use Plan and the 1996 North Corridor Plan make up the framework for guiding development where it is most compatible and determine which kinds of uses are preferred in the various areas of the county.

History and Background

The proposed site is located approximately 4 miles north of North Liberty, and is accessed from 200th St. on the eastside of Scales Bend Road NE. It is a 106-acre property adjoining the Coralville Reservoir, being part of sections 31 and 32, in township 81 N, range 6 west of the 5th P.M. in Johnson County. The site was initially leased to the Mississippi Valley Girl Scout Council on December 17, 1965. The 25-year lease ran from March 1, 1966 to February 28, 1991. The Girl Scout Camp, known as *Camp Daybreak*, ceased operations in 1990 following a fire.

Camp Daybreak had several buildings that were put up over the course of the lease. A lodge that was 40'x40', which had a main assembly room; a open shelter building which was 30'x40' and used for crafts, assembly etc.; 8 tent platforms that could house eight campers per tent/ per platform; two pit-type outhouses, each with four stalls; a 4'x6' storage building; 10-12 parking spaces. The camp was used primarily as a day camp, and had no facilities in place to operate as an extended stay camp.

By contrast, the proposed use by MYCA would contain a main convention/ lodge that would be approximately 260'x100'. In addition, there would be 12 tent-pad sites, 11 multi-use cabins, one canoe house, a caretakers residence which doubles as a gate/guard house. One of the greatest differences between *Camp Horizon* and the previous camp is that the MYCA facility is intended to be an extended stay camp. There is planned to be a total of 52 parking stalls for the camp guests along with a beach and a floating boat dock.

The projection of the number of potential campers at Camp Horizon does not necessarily correspond with the possible number of visitors at the camp at any given time. According to the proposal submitted by the MYCA, the central lodge could hold 200 people; 11 cabins can hold 8 people each for a maximum of 88; 12 tent pad sites which can house 96 people. A simple calculation tells us that 384 people could be housed overnight on this site. The question then becomes where all of these individuals will park. Assuming that only 25-30% of these people are driving, there still would be a need for an additional 45-65 parking spaces to accommodate this number of visitors. While the MYCA proposal claims significantly lower attendance numbers, the potential for a greater number of visitors needs to be considered.

Transportation Infrastructure Concerns

There seems to be a lack of rigorous analysis on the part of the U.S. Army Corps of Engineers and their consultant Zambrana regarding how the proposed use will impact the County's road infrastructure. Under the Scope of Work (SOW) document for the proposed lease, Section 5.5.6.3, one of the impact categories to be considered includes *public facilities and services*. Perhaps the largest public facility in this project is the road infrastructure. In order to address this issue thoroughly, it is necessary to examine how this proposed camp would impact the road network in the area. In particular, how the proposed Camp Horizon would effect both 200th St. NE and Scales Bend Road NE. Two Hundredth Street NE provides access to the road system for some of the abutting properties and to the interior subdivision collector roads. Scales Bend Road NE not only provides access for these adjoining properties, and subdivision collector roads, but also serves as the sole access for Jolly Roger Campground and boat launch area.

Over the past five years Johnson County has taken a *proactive*, rather than a reactive approach to land use planning. In 1996 it adopted an updated North Corridor Plan, and in December of 1998 adopted a new Land Use Plan (The 1998 Johnson County Land Use Plan). These two guiding documents not only identify where and when proposed zoning changes should take place, but also identify *standards* the development must meet, both on and off-site. The major off-site improvements required of developers concern the County's roads.

The Land Use Plan addresses transportation issues throughout the document. (Refer to pages 15 and 22 for specific policies and strategies) The General Development *Policy* concerning transportation is summarized below:

- 4.1 Continue to plan and improve the transportation system.
- 4.2 Ensure traffic safety.
- 4.3 Participate with JCCOG to coordinate Countywide and regional transportation planning.
- 4.4 Utilize land in a manner that will support public transportation where feasible.
- 4.5 Promote multi-modal transportation corridors, which include hiking, hiking and all-purpose trails, where appropriate.
- 4.5 Ensure transportation demands can be accommodated when evaluating rezoning requests.
- 4.6 Minimize the impacts of road building on the environment.
- 4.7 Plan for new roads that are logical and efficient extensions of existing street patterns.
- 3.4 Applications for rezoning which would make an additional demand on or require enhancement of rural County infrastructure should not be approved unless the developer agrees to bear the cost of improvement.

Additional *Strategies* of the 1998 Johnson County Land Use Plan concerning transportation are:

- 4.1 Create and adopt a Transportation Management Plan.
- 4.2 Develop an ordinance stating that proposed developments on existing County roads must dedicate the necessary rights-of-way for future road improvements.
- 4.3 Request that JCCOG develop with Johnson County and the cities of Johnson County, a master transportation plan that links the County and its cities with the region.
- 4.4 Develop criteria to evaluate proposed development on gravel roads.

4.5 Develop criteria and an ordinance for dust alleviation.

As a response to these policies and the strategies in the Land Use Plan, the Board of Supervisors have recently adopted (June, 2000) Road Performance Standards for county roads. They have established thresholds for roads in the county based on their surface type (i.e.; dirt, gravel, chip-seal surface, and paved surface). The threshold criteria consist of Average Daily Traffic (ADT) count currently existing on the road and the projected trip generation volume resulting from a proposed development. The County could require the developer make improvements to the road (*or wait*) until the County has scheduled the road for upgrading before such a proposed development would be approved.

A consistent effort has been made by the county since the 1970s to remove oiled chip seal surfaces from the inventory of the county secondary road system. Oiled chip seal is a dust-free surface, but does not have the structural properties of a paved (asphalt or concrete) surface. Both the County Engineer and the IDOT *do not recommend* upgrading a gravel surface road to an oiled chip-seal surface as an interim measure prior to paving. In addition to creating significant maintenance problems (especially during the inevitable spring thaw), accident data indicate an associated safety issue when gravel roads are converted to a chip-seal surface without first improving the horizontal and vertical geometry of the road. Merely applying a chip-seal surface to the road without improving its geometry *will increase vehicle speeds and will result in an increased accident rate.*

Johnson County Road Performance Standards

An excerpt from the Road Performance Standards, reads as follows: "For the purpose of evaluating rezonings and new subdivisions, *existing traffic volumes* shall be determined by the most recent available traffic count recorded by the Johnson County Department of Secondary Roads, the Johnson County Council of Governments, or the Iowa Department of Transportation, in that order. *Projected residential traffic volumes* shall be determined by adding to an existing traffic count (1) the number of existing platted lots with direct access multiplied by eight vehicle trips per day, and (2) the estimated density of development from any currently zoned residential property with direct access multiplied by eight vehicle trips per day. *Projected commercial and industrial traffic volumes* shall be determined by adding to an existing traffic volume the estimated trip generation based on the Trip Generation manual published by the Institute of Transportation Engineers." Development on chip-seal roads shall follow the criteria that are listed below:

Oiled chip-seal roads

- a. The appropriate traffic volume on an oiled chip-seal road should not exceed 1,000 vehicle trips per day.
- b. No rezonings shall be approved on oiled chip sealed roads with projected traffic volume greater than 1,000 vehicles per day unless improvement of said road is scheduled within the next two years of the adopted Johnson County five year road improvement plan.

- c. Subdivisions on oiled chip sealed roads with a projected traffic volume greater than 700 vehicles per day shall have approval conditioned on a density of development not to exceed one lot for every 20 acres, using a cluster-type subdivision design where at least 80% of the subdivision consists of a non-buildable outlot.
- d. Subdivisions shall not be approved on oiled chip seal roads with a projected traffic volume greater than 1,000 vehicles per day unless improvement of said road is scheduled within the next two years of the adopted Johnson County five year road improvement plan.
- e. The preceding vehicle volume thresholds shall be reduced by 50% if the measured 85th percentile speed exceeds the posted speed limit by 15 miles per hour or more.
- f. The preceding vehicle volume thresholds shall be reduced by 50% if horizontal or vertical geometry of said road is judged by the County Engineer to have significant sight distance constraints.

It is important to note that during the collection of traffic and speed count data performed by the County Engineer's Office during September of 1998, the 85th percentile speed averaged approximately 46 mph. This effects criterion 'e.' above significantly, and supports the premise that the road as currently configured cannot accommodate additional traffic volume.

Connecting Land Use and Transportation

As per Section 5.5.6.2 of the SOW document submitted by MYCA, if the proposed camp were to be developed, it would appear that the increased vehicle traffic in the area would be a long-term impact. The continued viability of the road system needs to be addressed and is called for in the SOW document Section 5.5.6.3.

According to the 1998 Johnson County Land Use Plan, if a proposed development necessitates improvements to County infrastructure, the developer must pay these costs. It would appear from the information received so far, that the proposed use could generate sufficient trips to necessitate improvements to both 200th St. and Scales Bend Rd. There is presently a significant amount of acreage zoned for single family residential use in the Scales Bend Road area (approximately 6 square miles of land). In addition, given approximately 154 platted, vacant lots are still available in this area, the maximum threshold for seal-coat roads will easily be reached and exceeded.

As is evident from the Road Performance Standards, development occurring in an area where the maximum ADT will be reached or exceeded, would result in either a reduction in the approved density for the proposed development, or denial of the development until the road was upgraded. This has the effect not of limiting all development, but does attempt to constrain the level of development density until the road can appropriately handle the volume of traffic that is a direct result of increased development.

The Road Performance Standards are supported by the *Five-Year Construction Plan* for the County's roads and development. It places responsibility squarely on the County to address road conditions in the areas where development has been approved or will continue to be permitted. Thousands of acres in the North Corridor (Scales Bend Road and 200th St. are located in the North Corridor) were zoned for residential use in 1960. The current Board of Supervisors have taken a proactive approach and acknowledged the County's responsibility for providing roads that are up to identified standards. However, with limited resources and budget constraints, it is impossible for the County to upgrade all of the roads which need it immediately.

The idea of timing improvements and development (concurrency) comes into play in this decision making process. Part of the idea of timing improvements is to establish criteria for individual roads in order to prioritize when and to what extent the road will be improved. Priority "points" are established for individual projects that are based on traffic counts, number of accidents, safety of the road, and type of service the road will provide (i.e. trunk, trunk collector, area service).

Projected Traffic Volume and Accident Data

Specific analysis concerning existing traffic volumes and accident data have been performed by the County and the Iowa Department of Transportation. These data, along with the recently adopted Road Performance Standards, support the County's position that *Scales Bend Road is approaching traffic levels deemed to be unsuitable for a chip-sealed surface road*. There are two segments of road on Scales Bend Road NE that have been counted by the IDOT during the Fall of 1998. The north segment of road has an ADT (average daily traffic) count of 720 VPD (vehicles per day). The south leg of Scales Bend Road NE has a ADT of 1510 VPD. Johnson County has performed a raw count in September of 1998. The details of both counts are illustrated in Table 1 below:

Table 1

1998 IDOT Traffic Counts and Raw Counts
for Scales Bend Road NE
and 200th St. NE

	ADT Counts		Projected Traffic Volume with Existing Platted and Zoned Properties Built-Out
	1998 IDOT VPD Count (Fall 1998)	September, 1998 Johnson County Raw Count	
Scales Bend Road NE (North segment)	720	Not Counted	1400-1800 VPD
Scales Bend Road NE (South segment)	1,510	975	2500-3000 VPD
200 th St. NE	40	Not Counted	

Source: IDOT Average Daily Traffic Counts (Revised 10/99); Johnson County, Secondary Roads Department;

As is evident from Table 1, the traffic count on Scales Bend Road NE is approaching the ceiling of 1000 VPD as called for by the Road Performance Standards on chip-seal road surfaces.

The accident history for this area was also researched by the County in September of 1998. Specific accident data are detailed from 1987 until 1998 in Table 2 below. There does appear to be a trend of an increasing number of accidents that have occurred during the past ten years. The speed data also show that the average person travelling on Scales Bend Rd. NE tends to exceed the posted limit of 30 mph. Speed data gathered as part of the September study indicate an average speed of 41.5 mph on Scales Bend Rd. NE, with *approximately 92.3 percent of the vehicles exceeding the posted speed limit*. As mentioned previously, the 85th percentile speed on this section of Scales Bend Road is approximately 46 mph.

Table 2

*Accident Data
for 2.2 Mile Section of Chip-Seal Surface
on Scales Bend Road NE*

	1987-1989	1990-1993	1994-1996	1997-1998
Number of Reported Accidents	2	9	12	8

Source: IDOT Accident Data.

While the accident occurrence at the intersection of 200th St. and Scales Bend Road show no accidents from 1987 to 1996, it should be mentioned that an increase of 2 to 8 times the volume of traffic on 200th Street could contribute to an increased number of accidents. An analysis of the numbers of trips generated by the MYCA camp was conducted by JCCOG. The number of additional trips projected is shown in Table 3.

Table 3

*Projected Number of Trips (VPD)
From Proposed MYCA Camp
Onto 200th St. NE and Scales Bend Road NE*

Summer Trips (Peak Season)		Off-Season Trips (per day)	
Weekend Trips	Weekday Trips	Maximum	Minimum
240	40-50	340	120

Source: JCCOG, Doug Ripley (Traffic Engineering Planner) memo dated May 19, 1999 to County Engineer detailing traffic generation estimate for MYCA Camp Horizon.

It should be noted that these projected traffic volumes already exceed the Road Performance Standards for Scales Bend Road NE, of 1,000 VPD on chip-sealed surface roads. The additional trips onto 200th St. NE may exceed the guidelines of having 300 VPD on gravel roads.

Construction Cost Estimates for Upgrading Scales Bend Road NE

Construction cost estimates for improving the intersection of Scales Bend Road and 200th St., along with cost estimates for upgrading both roads were calculated by the County Engineer during July of 1999. The cost of improving the intersection of 200th and Scales Bend Rd. could range from \$100,000-\$120,000 if right of way (ROW) acquisition costs are included.

To upgrade Scales Bend Road to an ACC (asphalt) or PCC (cement) paved surface road would entail a significant cost expenditure on the part of the County. In order to grade and pave the 2.2 mile surface, the County Engineer has estimated a cost of approximately \$2.5 million, which does not cover ROW acquisition costs. This estimate is also exclusive of certain soft costs including design and project management.

Water and Wastewater Infrastructure Issues

The proposed shared well and wastewater systems need to be evaluated as per DNR regulations. A question that has not been addressed is what the projected needs will be for water and wastewater systems for the MYCA Camp Horizon. While the number of campers and attendees to the camp have been alluded to, it is certainly not clear what level of attendance will be given over to the site. As stated in the initial proposal dated March 15, 1999 by MYCA: "The Board of MYCA is committed to utilizing the site four seasons out of the year, actively marketing and inviting regional business, educational, and cultural communities to make use of the resources of the site." The bottom line is that it is difficult at best to tell what kind of demands will be placed on this area in terms of water and wastewater systems.

The 1998 Johnson County Land Use Plan also states under the Environmental General Development Policies we should, "Protect the environmental quality and natural resources of the county, such as woodlands and forested areas, by reducing forest fragmentation and destruction of natural habitat for wildlife and plants. (p. 10; 1.1 1998 Land Use Plan) "Protect drainage areas, creek beds, and other highly erosive lands." (pg. 14; 1.3 1998 Land Use Plan) The Plan also seeks to "Protect Johnson County water quality." (pg. 14; 1.4 1998 Land Use Plan) Other Land Use Strategies seek to "Continue to monitor ground water levels and quality in selected aquifers." (pg. 21; 1.4 Land Use 1998 Plan)

Additional Environmental Impacts

The SOW document submitted by Zambrana under section 5.5.5 covers existing conditions and evaluates negative impacts on the natural resources of the area. These impacts can be detrimental to the trees, air, water, as well as historic and archaeological sensitive sites. There is also a question of whether any of this development occurs in or near the floodplain. With respect to floodplain development, the information given to the County was not clear as to whether some of the buildings were to be placed in the 713.0' level. After the 1993 flood, the county has

deemed that development should not occur at levels below 718.0'. In the original lease signed between the Corps and the Mississippi Valley Girl Scout Council, it was specified that there not be any structures for human habitation below 715.0', and no permanent structures were to be erected below 712.0'.

Past Corps practice with regard to tree removal and clearing has been to fine adjacent property owners who remove or trim trees on abutting Corps land. This has been the case since the Coralville Lake easement was obtained. The MYCA proposal seems to be in direct conflict with this past practice. The MYCA proposal states that the *improvement of the site through permanent structures* will "most often require some removal of trees and understory, especially in the case of the central lodge." "Some" tree removal is a difficult amount to ascertain, and becomes even less clear when taking into consideration the commensurate amount of grading and clearing that will be done.

Similarly, the Land Use Plan seeks to guide and control development in sensitive areas which contain historic sites, wetlands, and steep slopes that may be damaged by such development. Development in sensitive areas is a serious issue for the County. Just recently, the Sensitive Areas Ordinance Citizen Advisory Committee has finished drafting an ordinance, as required by the Land Use Plan, to present to the Board of Supervisors for consideration.

Emergency Service Concerns

There is also the question of how emergency services will be delivered to a development of this size, in such a remote location as this. Sheriff, fire protection, first response and ambulance service comprise the necessary emergency protection services that will have to serve this area. With the continued growth in this area as a result of residential development, it puts additional burden on the existing services. There also seems to be some discrepancy as to whether the Sheriff's department has authority to come onto this land. This issue needs to be discussed and concrete arrangements need to be in place to allow for access of these emergency services as well as detailing the amount and kinds of services that will be provided.

Parking for the proposed MYCA camp will include 52 parking stalls. This number appears to conflict with the number of potential visitors that could attend the camp on a regular basis. There has been no mention in the MYCA proposal of having their own bus, or charter service to be able to transport the campers into town, and around to other areas in the county. The Planning and Zoning staff have contacted Tim Shanahan, the City Manager of North Liberty, and have confirmed that no representative of MYCA has contacted them regarding parking for a bus staging or transfer area. In addition, Mr. Shanahan has indicated that there is no such public space available in North Liberty for this purpose.

Another parking concern would be that a lack of parking on the site may force cars onto 200th Street NE, or even Scales Bend Road NE. This could pose a potential hardship for the residents of the adjacent Cumberland Ridge Subdivision with respect to access into and out of their subdivision. In addition, it could pose some severe restraints on emergency vehicle access to

both the site and the adjacent subdivision. Parking along the shoulders of the roadway cannot be considered as an option because it is illegal according to State law.

Socio-Economic Impacts

According to the Johnson County Zoning Ordinance, chapter 8:1.1 Purpose. "The purpose of Chapter 8.1 shall be to promote the public health, safety, comfort and general welfare, to conserve the values of property throughout the County, and to lessen or avoid congestion in public streets and highways, and to facilitate the adequate provision of transportation, water, sewage, schools, parks, and other public requirements."

Many variables enter the decision making process when purchasing property, especially for a personal residence. One of these is what uses are permitted for the property in question, as well as what uses are to be permitted in the surrounding area(s). Another variable in this decision making process would be the value of the land when purchased, and the expected future value. When purchasing a home, most buyers expect property values to appreciate. Incompatible uses next to or within the area can have a negative impact on property values, to the extent that property values could depreciate. These negative externalities can be influenced by various impacts such as relatively high noise levels, increased traffic congestion, and safety issues.

Compatibility with Existing Plan(s) and Adopted Policies

This proposed use does not fit the site and the surrounding land uses primarily because the entire adjacent area is zoned for residential use. The pressure to develop new residential sites in this area continues, with new applications appearing on practically a monthly basis. Add into the equation a camp which has the potential to add a significant amount of vehicular traffic and impacts to the surrounding uses, and you make the task that much more difficult. The Johnson County Land Use Plan speaks very clearly to development for the county as a whole and for the North Corridor. In making land use decisions, these general development policies with respect to environmental issues should be followed:

- 1.1 Protect the environmental quality and natural resources of the County such as woodlands and forested areas by reducing forest fragmentation and destruction of natural habitat for wildlife and plants.
- 1.2 Preserve significant features, such as prairie remnants, wetlands, steep slopes as defined by a Sensitive Areas Ordinance, and prime agricultural land. (Please see Johnson County Soils Map, Page 2M)
- 1.3 Protect drainage areas, creek beds, and other highly erosive lands.
- 1.4 Protect Johnson County water quality.
- 1.5 Protect archaeological sites, artifacts, and themes such as burial mounds.

General development policies also seek to minimize land use conflicts. There are specific policies that are listed below in order to reduce conflicts between uses:

- 3.1 Recognize existing zoning patterns and minimize disruptions to existing uses.
- 3.2 Ensure adequate infrastructure and quality public services are available at a level appropriate to the land use.
- 3.3 Evaluate rezoning proposals to ensure additional development does not occur at a density that requires urban services.
- 3.4 Applications for rezoning which would make an additional demand on or require enhancement of rural County infrastructure should not be approved unless the developer agrees to bear the cost of improvement.

North Corridor Development Policies (Please refer to the 1996 Johnson County North Corridor Plan for the sub-area plan.) The policies adopted as part of this Land Use Plan are derived from County-wide goals and objectives as well as those developed as part of the planning process for the North Corridor area.

- 2.1 Preserve the scenic rural and natural character of the North Corridor.
- 2.2 Plan for and allow growth in areas with existing infrastructure that require minimal new or additional services.
- 2.3 Encourage the use of clustering to preserve open space and sensitive areas.
- 2.4 Encourage centralized wastewater disposal systems in compliance with County Health standards in large subdivisions
- 2.5 Where feasible, encourage shared wells and limit the number of new wells drilled.
- 2.6 Limit development in areas sensitive to soil erosion and encourage the use of soil conservation techniques.
- 2.7 Infill development is preferred over rezoning and creating new subdivisions when a substantial number of vacant lots are still available.

Staff Conclusions and Recommendations

In conclusion, the County is concerned that if the proposed lease for Camp Horizon is permitted, the orderly, planned growth for this area will not have been taken into account. Further, consideration of the 1998 Land Use Plan and the 1996 North Corridor Plan will have been dismissed. If this lease application were a development proposal before the Board of Supervisors at this time, the chances for approval would be unlikely, given the issues previously discussed. The question of the ability of the road to handle the vehicular traffic is a primary concern, as is the available parking planned by MYCA. There are also serious concerns dealing with the environmental impact a development of this scale will bring to the area.

A large question remains concerning this site selection as opposed to an alternative location, which could be located on another site of Corps owned ground. It appears as if the Corps has given its stamp of approval on this project without evaluating the efficacy of alternative sites which may be more compatible with the applicable county plans and ordinances. One wonders if the suitability of the site was based merely on the fact that the past use of this land was another camp.

It must be remembered that the facility proposed by MYCA is *very different from* Camp Daybreak; Camp Daybreak functioned primarily as a low-intensity use day camp, with many fewer buildings and visitors and associated impacts on the surrounding residential area.

The proposed facility could be located in an area where the impacts to the surrounding land and residents were less intensive. It should be noted that County policy requires that a developer work with the County on resolving the aforementioned issues.

Given all of the concerns and issues discussed, we would recommend that alternative #3 be considered by the Corps which is to solicit applications for a non-profit lease at a reduced level of use. The impacts of this proposed facility have been outlined and discussed at some length. The County would welcome an open dialogue with the Corps to attempt to locate another, more appropriate site for the proposed facility.

Report Prepared by:

Dan Swartzendruber
Assistant Planner

R.J. Moore, AICP
Assistant Planning and Zoning Administrator

Presented by:
Rick Dvorak
Planning and Zoning Administrator