

GP12

December 31, 2001

Ms. Karen Hagerty  
USACE, Rock Island District  
Clock **Tower Building**  
**P.O Box** 2004  
Rock Island, **IL** 61204-2004

Dear Ms. Hagerty,

**This** letter is in response to the Environmental Assessment prepared by Zambrana Engineering and approved by Colonel William J. Bayles, District Engineer. It is my opinion that the Finding of No Significant Impact by Zambrana Engineering and accepted by the Corps of Engineering (COE) is incorrect. I request that a complete Environmental Impact Study (EIS) be done regarding this proposal. However, I have one request of the COE which might eliminate the need for an EIS altogether.

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**The** next to last paragraph on page **45** of the Environmental Assessment reads, in part, as follows:

"By applying the above separation distances from inhabited residences (1,000 feet), wells (400 feet) and lakes/public impoundments (400 feet) to the proposed site, **no areas exist within the present boundaries for the installation of a waste water disposal system under existing criteria** for either Alternatives 1 (MYCA Lease) or 2 (Reduced Use) (Figure 5-1). The Iowa Department of Natural Resources' regulations provide for application for a variance. If a variance is applied for and granted, a facility may be located on-site. Areas potentially available for an on-site treatment facility are indicated on Figure 5-1, should a 400-foot residential setback be granted by the **IDNR.**"

Though there are, in my opinion, numerous reasons why this proposal, and the subsequent Environmental Assessment, are outrageous and should be abandoned, it is my belief that no wastewater treatment and disposal facility variance would likely be granted under any circumstances.

Therefore it is my request that the COE require MYCA pay for the design of a wastewater treatment and disposal facility and submit their plan with an application for a variance from the Iowa Department of Natural Resources (**IDNR**). I would also ask that the COE suspend any decision regarding public comments, final acceptance or rejection of the preliminary Environmental Assessment by Zambrana Engineering, and any potential preparation of a Lease until such time as the **IDNR** has granted or rejected the request by MYCA for a variance.

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It appears to me that the Environmental Assessment has been, at best, a nasty waste of taxpayer dollars to this point, I will not go into the many errors made by Zambrana Engineering as I believe the COE has already received numerous complaints in that regard. However, in my opinion, both the Corps of Engineers and the public deserve to know whether any wastewater treatment plan, and subsequent variance, would ever be approved by the Iowa Department of Natural Resources before we all move toward further confrontation.

To this point MYCA has not been required by the COE to provide any working drawings of the improvements for review. There are no bona-fide blueprints, only proposals and conceptualizations. However, in my opinion, based upon the assumptions made by the COE and Zambrana Engineering for water usage and wastewater produced, as found in the EA, MYCA should be able to have a system designed and submitted to the **IDNR** for a variance. There might be minor changes at a later date if approved, but the basic wastewater plan could be reviewed and approved or rejected by the **IDNR**. Should no variance be approved then the **COE** saves its real employers, the taxpayers, literally thousands of dollars which would most certainly be wasted on the many unnecessary steps which we are inexorably moving toward taking in the months before us.

I am sending this letter to our two Iowa Senators and Congressman Jim Leach for their review, Please consider this idea as a means to save us all a lot of time and, more importantly, misspent taxpayer dollars.

Sincerely,



Alfred H. Carr

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