GP 18

December 23,2002

Andrea Elliott
3480 Cumberland Ridge Road
North Liberty, Iowa 52317
(319)665-6099

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

Dear Ms. Hagerty,

6-1 My response to the Environmental Assessment (EA) for the proposed lease at the Daybreak site is that it is not consistent with the Coralville Lake project purpose or the 1977 Master Plan. Also, there is incomplete, inaccurate and unsubstantiated information in the EA
31-1 that makes it invalid. On page 13, MYCA is listed as the preferred alternative because of FONSI, consistency with project purpose and need, consistency with the Master Plan and land designation, and providing increased recreational benefit to the greatest number of users.
2-7 land is not a suitable site for a project of this magnitude and rather is a valuable resource, which should remain undeveloped or minimally developed.

2-12 The 1977 Master Plan emphasizes the need for this kind of forest resource even 25 years ago when the population of Johnson County was much less. On page 45 it reads "The relative value of the forest resource is perhaps even higher in Johnson County because of the large urban populations in and near the county. Emphasis will be continued on those management policies which encourage recreationists to use the forested areas around Coralville Lake in their natural state with a minimum of manmade developments." The Corps of Engineers has served the public with recreation opportunities at the dam complex and other properties around Coralville Lake for swimming, boating, and picnic sites. Page 50 of the Master Plan says, "it appears that there is a relative shortage of high value scenic resources, and opportunities for isolationist recreation are nonexistent. Future provisions for opportunities to sightsee, hike, walk, etc., should take into account the fact that recreationists in this region have ample areas for high density recreation activities but few opportunities to escape from other visitors and enjoy quiet and solitude." **Alternative 3 should be the preferred alternative because it is consistent with the project purpose and need.**

6-18 Alternative 1 is not consistent with the goal to manage resources "in their natural state with a minimum of manmade development." It is not consistent with the previous use of the site (32 campers for a few weeks per year vs. 200 campers or visitors year-round). It is not consistent with the scope of development anywhere in the Coralville Lake project The lodge at Lake Macbride State Park is one story and measures about 30 x 100 ft Indeed, no building at Coralville Lake approaches the scale of 70 x 250-foot as proposed by Alternative 1. Although the Daybreak site is 106 acres, the site is narrow and steeply sloped and is not suitable for the proposed use The Macbride Field campus is 1000 acres and hosts about 2500-3000 visitors in small groups each year, according to the EA, page 33. The MYCA proposal is to host 13,500 visitors each year (EA page 14), in groups of 200 at a time on a much smaller and narrower site surrounded by private residences.

6-1 Alternative 1 is not consistent with the land use designation for the Daybreak site. After an exhaustive perusal of Master Plan Volume I, Volume II and all Appendixes, the only

Castle had a cover letter and neither showed a land use designation for the site. They merely showed site maps for public recreation areas at Coralville Lake.

6-1

page 6 of the Scope of Work document, the alternatives are discussed. It mentions one alternative is to "rezone the area to low density recreation or reserve forest so it would no longer be available for lease by non-profit groups." Since the land was simply designated Leased Land in the 1979 Appendix B and D of the Master Plan (see Plate C-2), and the Natural Resource Inventory System (NRIS) land allocation in 1990 was LR and RF, the land has already been "rezoned" and should no longer be available for lease by non-profit groups. The NRIS clearly shows the intended use and the management plan for this site **Alternative 3 is the preferred alternative by the Corps of Engineers 1977 Master Plan with Appendixes and the 1990 Forest Resource Inventory.**

6-1 – Alternative 1 is not consistent with Appendix F of the Master Plan. The Daybreak site is designated Protected Lakeshore – no private or public development - Environmental area. The Corps of Engineers (COE) clearly understood this designation when they erected an osprey platform on this site. The COE committed to a minimum of 4 years of osprey releases from the Macbride Recreation Area, beginning in 1997. Ospreys have been released from the hack tower right across from the Daybreak site since that year, for a total of 23 birds. These birds take 3-4 years to reach reproductive maturity. The first nesting activity was expected in 2001, and would continue to be expected for the next 4 years, just for the minimum commitment of 4-year release.

In fact, Jodeane Cancilla of the Macbride Raptor Project observed nesting activity at the Daybreak platform during the breeding season of 2002. Reproductive success is greatly

9-7 influenced by habitat loss and human activity. The osprey nest site is 390 feet from the proposed lodge's parking lot, not greater than 1000 feet as stated in the EA. Five acres of trees would be cleared and a beach constructed just 400 feet from the osprey platform. Dredging of a wetland to make room for a floating boat dock and the human presence at the boat dock, beach and lodge 200 to 400 feet from the nest site during the breeding season each year, would have great impact on the osprey program's success. The local expert on the osprey program, Jodeane Cancilla, communicated in several e-mails to Zambrana in July 2000 that she considered the ***MYCA*** proposal to be detrimental to the goal (supported by the IDNR and the COE) to have a self sustaining breeding population of ospreys in Iowa. There are only two other places in Iowa where an osprey program has been introduced The program is very expensive and time-consuming Ms Cancilla expressed a strong preference for Alternative 3.

2-13 The U S Forest Service has guidelines on federal lands restricting timber harvest, road building, and other human disturbances within ¼ mile of an osprey nest. My sources for information on ospreys and federal guidelines are.

http://www*dnr*.state.wi.us/org/land/er/factsheets/birds/Osprey.htm
http://wwwstate.ia.us/government/dnr/organiza/fwb/wildlife/pages/ospreyrestr.htm
http//forestry.msu edu/msaf/PDF/USFStypes.PDF
http://www fs fed us/r9/gmfl/nepa_planning/ea/gmnf_tes_amend_App3_forest_plan_language **PDF**

The **EA** was inaccurate when it stated on page **41** that the osprey platform **on** site was currently not in use for nesting. The **EA** was inaccurate when it stated that the nesting platform was located more than 1000 feet from the activity areas, when it is 390 feet (measured by GPS). The **EA** ignored the expert opinion of the Macbride Raptor Center director, Jodeane Cancilla, who stated that boat traffic is not as disruptive to ospreys as would be human presence on land. **Alternative 3 is the preferred alternative because of the commitment of the COE to the Raptor Project and the need to follow U.S. Forest Service guidelines,** These federal guidelines call for restricted activity within 1320 feet of a nest during the nesting period (April 1- October 1) and prohibit significant changes in the landscape within 660 feet of **an** osprey **nest.**

13-6 Other inaccuracies in the **EA** are the site maps (figures 4-2 and 5-1) which have incorrect well locations and residence placements. This greatly effects the siting of a wastewater treatment system and makes the **EA** invalid. If a wastewater system can not be sited, even assuming the **DNR** grants a variance, it does not make sense to sign a lease. The Natural Resource Conservation Service (NRCS) soil limitation ratings for **soil** absorption fields were 13-12 ignored in the **EA.** The categories that need to be addressed include the depth to bedrock, the depth to high water table, the fact the area is frequently disturbed by flooding (p. 19 of **EA),** and the slope. Figure **4-1** shows slopes of 18-40% where the absorption field would need to be placed. Slopes greater than 15% are rated severe by the ***NRCS*** and no explanation or assessment was attempted in the EA. **Understanding the crucial nature of siting a wastewater treatment system that can handle the needs of the camp as** it **is designed to be used, and given the lack of any true analysis by the EA, an EIS** is **mandatory.**

31-7 Many impacts were not adequately addressed. Light needed for security and safety needs of the camp would change the landscape both lakeside and for rural residences, with possible impact on wildlife. The noise study only analyzed traffic noise and failed to include analysis of 200 voices, amplified sound, bells, or a call to prayer five times a day. Security fencing or tree borders would present aesthetic concerns and could significantly impede wildlife movement. Dredging wetlands to make a place for a boat dock was not analyzed, neither was the ongoing need to maintain the beach.

5-5 Neighbors' concerns were not adequately addressed in the EA. Trespassing is a valid concern and would force neighbors to fence their yards, forever changing the rural landscape and hampering animal migration. Animal displacement would be a huge cumulative impact as the 9-4 area has less and less "wildlife corridor." Traffic and safety concerns are substantial, especially 22-5 on a narrow country road (200th Street) that serves 17 private homes and where the children walk to catch the school bus on the main road (note MYCA's year-round use).

22-5 **Johnson** County has a major concern with the chip seal road, which would have to accommodate the additional traffic. The vehicles, including buses, would travel two miles on Scales Bend Road, which has blind curves, steep embankments and is approaching maximum capacity for chip seal roads. Both my husband and I, in separate incidents, have run off this section of the road in the first year we lived here and had to be towed out of a ditch. It is dangerous anytime, but especially in bad weather, and especially to the unfamiliar traveler. It seems evident that the Corps expects Johnson County to improve both Scales Bend Road and 200th Street to accommodate this development even though the roads are not slated for improvement **in** the recently released five-year plan.

22-11 The EA completely disregarded the lack of adequate parking in the camp (with nowhere to expand unless they fill in deep ravines), and the incredulous plan for shuttling from a non-existent off-site parking area. They are clearly proposing a facility that cannot accommodate the parking requirements and have not demonstrated a commitment to any workable solution. Illegal parking will be a daily issue for the neighbors and the sheriff department, especially on

weekends. That is simply irresponsible. **The EA is invalid because it failed to demonstrate "no significant impact" to the environment or the neighborhood.**

The EA dismissed concerns about prohibiting public access to the property and shoreline even though page 52 of the EA quotes the 1981 Corps Lakeshore Management Plan which says, "Ready access to, and exit from, these shorelines for the general public shall be provided," The leased land borders on private property, which has been open to the public for the last 30 years with primitive trails and signs welcoming people to Sherwood Forest. These trails will have to be closed if the Corps leases the land to MYCA because the trails provide access for the public to the shoreline through that federal land. It is clear from the MYCA proposal on page 17, that the entire property will be closed to the public, except for selected non-profit groups, because of three concerns. They need to protect their multi-million dollar investment and will have a caretaker residence at the gate, they don't want to cover insurance costs of injury liability, and they are concerned with nuisance lawsuits by "hostile neighbors."

3-10

Whether the site can accommodate expansion should be addressed in the EA since page 9 of MYCA's initial proposal document makes reference to the "initial lodge" not having adequate room for the participants they want to host. Expansion is presumed because all revenues must be used to upgrade the facilities, and with the income generated by 13,500 participants annually, the upgrade could be substantial. If they do not use the revenues, they will lose them to the COE. MYCA's original proposal states on page 7 that "To attract consistent audiences for retreats and conferences, a site must provide attractive lodging and dining facilities for those most likely to participate – members of the professional class." The permanent closure of this federal land to the genera1 public, especially to provide a facility for adult seminars, weddings, and computer training, is not consistent with the Coralville Lake project and its Resource Use Objectives as stated on page 1 of the 1977 Master Plan.

6-1

One conclusion that is supported even by the EA in its present form (page vi.) is that "there is a recognizable difference in the magnitude of impact between each alternative." Alternatives 3 and 4 were discounted because they were said to "not meet the criteria for high intensity recreational use of the premises..." In fact, they do meet the criteria for the current land designation of RF and LR. **Alternative 3 is the preferred alternative because it removes only 0.1 acre of forest to put in parking and primitive trails, it allows permanent access to the public for recreational pursuits in keeping with the intended use of the land, and it prevents any development on the protected lakeshore. Furthermore, the selection of Alternative 3 does not require any further impact studies or permits, and it protects habitat for ospreys and bald eagles.**

6-1

The FONSI must be discarded because the conclusions were completely based on a false designation of the site. The substantial number of errors in the EA must not be simply corrected, but the entire project must be reevaluated in every detail.

Sincerely,

Andrea Elliott

Andrea Elliott