

GP 36

December 17, 2002

Department of the Army

Rock Island District

Corps of Engineers

Clock Tower **Building**

P. O Box 2004

Rock Island, IL 61204-2004

Attn: Planning, Programs, and Project Management Division (Karen Hagerty)

To Whom It May Concern

I am writing to challenge the draft Finding Of No Significant Impact in regards to the proposed lease by the Muslim Youth Camps of America of the former Camp Daybreak area at Coralville Lake.

There will be significant impact on the environment, the roads, the neighbors, the local governmental agencies and the entire community.

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The environment will be impacted in several ways. First, the Muslim Youth Camps of **America** proposal for the development of this project states that 403 trees will be removed from the site. **Many** of those trees are over **6" diameter**. It is difficult to comprehend that the removal and destruction of 403 large trees bears no significant impact.

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While **we** do not believe that there is any serious overall environmental harm to the reptile and amphibian community of the Coralville Reservoir **by** the Muslim Youth Camps of America Convention **Center**, this part **of** the FONSI document is laughable. Zambrana thinks Timber Rattlesnakes might be one **of** the species that might potentially be occurring at the site, but does not recognize that the most common species **is** Brown Snake. There are no Timber Rattlesnakes in Johnson County now nor in the recent past, nor in this part of the state. I suggest that this just points out one more place where this study is seriously flawed.

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The site has no location for a waste water treatment and disposal facility which meets the separation distances from inhabitable residences, wells and lakes. This is cause for great concern. **A** variance would have to be granted by the state of Iowa Department of Natural Resources. The minimum separation distances are determined to provide for negligible impact to surrounding areas. The reduction of these minimum separation distances would cause significant impact to the environment. The document contains apparent errors in mis-measurement and misplacement of wells. Cumberland Ridge I's Well is not located as stated, there is a difference of at least 600'. Cumberland Ridge II's Well is not **shown** at **all**. There are other measurement errors, all of which appear to minimize problems for wells or sewage disposal. Setbacks measurements are inaccurate. These are particularly troubling for waste water obligations, Better measurements would have drawn attention to the problems with the proposed variance. Are the measurements purposefully

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inaccurate? The proposed convention center, with the anticipated load of participants, will generate an enormous quantity of waste water. This will have potential impact on wells in the community and downstream and on recreation in the reservoir.

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The **EA** states that the existing well is rated at 28,000 gallons per day. The demand for the development is estimated at **8,860** gallons per day. There **is no** data to **support** the claim that no draw down of the aquifer will occur outside the site boundary. The depth of this well is **similar** to three private/semiprivate wells adjacent to the property. Current water usage from the adjacent wells is estimated at 4,000 gpd. The pumping of 8,860 gallons per day of water from the same aquifer could cause significant impact to the existing well users.

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It will be interesting to see how much sand will be needed to continually fill the beach every year, without damaging the aquatic and surrounding environment. It seems that after 1993, the Corps' philosophy has been to raise the level of the reservoir rather than to worry about siltation. It will be also interesting to see how the engineers plan on getting sand to the beach. The plans only call for the road on top of the ridge. There is no mention of dump truck access that I can find. **This** whole project will increase runoff and increase siltation, which goes against the primary purpose for which the reservoir was built.

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According to the **EA** the intended use of the land is consistent with previous use of the site. **This** is simply not true. The Girl Scouts use of the site was limited to summer use, with only very limited winter use. There was one enclosed building approximately 30'x50', with a small bathroom with flush toilets, and the remainder was a big open **bunk room**. There was an open air pavilion without windows. The site was not used for any **off** season activities by outside groups. The proposed use by the **Muslim Youth Camps of America** calls for the construction of permanent facilities consisting of a main lodge, caretaker's house and 10 or more cabins, **66** permanent parking spaces, 5,000 ft² beach, canoe house, floating boat dock in the water and an international village. This **in** no way compares to the use by Camp Daybreak.

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With respect to the roads and parking, it is stated that certain special events at the site (not camping/recreational) such as weddings, conferences and meetings could generate in excess of 100 vehicles per day. **An** increase of 100 cars per day on the gravel access road will have a significant impact on the neighboring areas and on traffic flow on Scales Bend Road. To say nothing of where these cars will park on a lot that will be designed to hold fewer than 100 cars. Zambrana Engineering was given up-to-date traffic counts for Scales Bend Road, yet attempts to judge the impact of the daily and yearly traffic caused by the proposed the **Muslim Youth Camps of America** on the basis of a few days worth of data. This is poor engineering and poor science. This is another example of the use of poor data to support the Finding **Of** No Significant Impact.

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We point out again all the various groups that have opposed this project. The Johnson County Board of Supervisors, **City** of North Liberty, Penn Township Trustees, and Cumberland Ridge Homeowners have all opposed this project due to the magnitude and

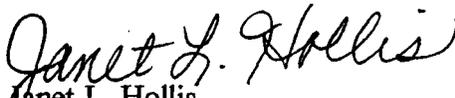
the vast difference from any previous usage of the area. The lack of compatibility with the surrounding area is apparent. Environmental damages by the removal of hundreds of trees and lack of adequate spacing for water and sewer systems will cause significant impact to the area. The scope and scale of the proposal by Muslim Youth Camps of America is vastly different from the previous use by the Girl Scouts. The use of the area for conferences, weddings, receptions, and retreats is commercial and does not comply with any land use plan of either the Corps or the County. (10-1 6-17) 30-10

We encourage you to reevaluate this project. There will be significant impact if the Muslim Youth Camps of America is allowed to develop this Commercial Project on Corps land.

To sum it up in a few words, the major objection of most everyone concerned is one of Magnitude ---This is far, far larger than Camp Daybreak ever was --- All you have to walk around the ruins of Camp Day Break with the architect's sketches for Muslim Youth Camps of America lodge to see the difference. This difference in scale will affect everything else: greater effect on the environment, greater traffic on the road [more wear and tear on our roads and more accidents], greater effect on our wells, greater demands for our emergency services, etc. Daybreak was a Community Resource, not a Commercial Project. Daybreak, because of its small size made limited demands on our community's services. -2-7 2-11

Respectfully Submitted,


Richard J. Hollis


Janet L. Hollis

3524 Cumberland Ridge Rd. NE
North Liberty, IA 52317
319-665-3141
rjhollis@earthlink.net

Cc: Johnson County Board of Supervisors, City of North Liberty, Penn Township Trustees, Congressman James Leach, US Senator Charles Grassley, US Senator Tom Harkin, State Senator Bob Dvorsky

