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Hagerty, Karen H MVR

From: Kealm3530@aol.com

Sent: Wednesday, January 01, 2003 3:21 PM

To: CampDayBreakEA@mvr02.usace.army.mil

Subject: Public Comment



ENVIRO-1.DOC

I am attaching a comment letter to be considered during the public comment period related to the draft **FONSI/Daybreak**.

I will also send you a signed copy through the U S Mail.

Mark Kinney

December 30, 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)

RE: Environmental Assessment of The former Girl Scout camp, Daybreak

I am writing in response to the Environmental Assessment (EA) provided to the Corp of Engineers (COE) by Zambrana Engineering. The EA contains errors and pertinent data has been omitted. This omitted data and errors conflict with the finding of no significant impact. This correspondence will point out (1) The errors (2) Omitted data (3) Other Concerns.

31-8

(1) Errors:

Well Location

Figure 4-2 shows the location of the Cumberland Ridge Development private well. The scale on the map indicates that $\frac{3}{4}'' = 200'-0$. According to the map, if the well site is scaled perpendicular from the property line (shown in red on the map), the scaled distance is approximately 325'-0 from the property line to the well. (This assumes that the property line is correctly located.) The well is actually located adjacent to Cumberland Ridge Road (not shown on the map). A taped measurement from a property pin located southeast of the well and directly adjacent to a COE boundary marker to the centerline of the road is approximately 22'-6". A taped measurement from the centerline of the road to the well is approximately 13'-9". The total distance from the property line to the well is approximately 36'-3", not 325'-0 as indicated by scale. In addition to improperly locating one well, two other private wells in the immediate vicinity were not located. They are Cumberland Ridge II Development's well and Tom and Doris Woodruffs well. Identifying and accurately locating these wells is a significant factor in determining a finding of no significant impact. The location of wells is crucial in determining the location of any proposed wastewater treatment facilities. Professional people with due diligence would have accurately located the three private wells. Zambrana staff was able to locate one well "incorrectly", in a study that took two years to complete. When gross errors such as this exist in the assessment, the EA is at a minimum inconclusive, if not invalid. Consequently the EA cannot substantiate the finding of no significant impact.

13-6

Corp Master Plan:

The Corps Master Plan from 1977 indicates that the proposed lease area has “protected shorelines” and a part is forest reserve and consequently for low intensive use. The EA asserts that the area is for high intensity use and makes no mention of forest reserve or protected shoreline. To assert that the lease is consistent with the Corp of Engineers master plan for high intensity/recreational use is at minimum inaccurate. I would challenge the COE to review its own master plan and prove to the public that this land is for high intensity/ recreational use. Without the COE validation of its own master plan and land designation, the whole basis of the EA is unfounded. The finding of no significant impact becomes inconsequential because the compound and convention center cannot be placed on this location according to the COE’s own master plan.

6-1

(2) Omitted Data:

Well Location:

Figure 5-1 shows wastewater setback limits with color-coded buffer zones. Three private wells are not located on the map (omitted). The wells not located are Cumberland Ridge I homeowners well, Cumberland Ridge II homeowners well and Tom and Doris Woodruffs private well.

13-6

The well that may have the most influence on the layout of the buffer zones is Cumberland Ridge I homeowners well. Without the location of these wells and a 400’-0 buffer radius shown around the wells, the map is incomplete. Therefore the finding of no significant impact based on information from this map is at a minimum inconclusive.

Concerns of local government and residents:

The concerns of the public and local governments are not completely addressed. The COE in its day-to-day operations is not required to consult local governments. However, when local governments will be required to provide services for a COE driven project, professional courtesy and cooperation are warranted. Consultation with The City of North Liberty, the Johnson County Board of Supervisors, and the Penn Township Trustees never occurred. Funding for the services that are necessary for public safety (fire protection, emergency service, and police protection) are provided by these agencies. Neither MYCA nor the COE is providing funding to support these services. North Liberty and county residents provide the funding for these services through taxes. A project of this scope and location will affect these services and consequently the residents. Without addressing the public safety issues stated above, finding that no significant impact exists is at a minimum, inconclusive.

20-3

(3) Other Concerns:

Many other issues in the EA are lacking in detail to adequately assess no significant impact exists. Several are listed below.

- (1) Use of unqualified sources of data
- (2) Clearing and Grubbing
- (3) Wastewater Design
- (4) Traffic studies

Use of Unqualified Sources of Data

Details in the EA indicate that **403** trees will be removed from the proposed site. (Page 42 of EA, information source is MYCA). MYCA has no qualifications and training to determine the number of trees that would need to be removed from the proposed site for a construction project of this scope. The use of data from unqualified sources lends no credibility to the EA. The use of data from unqualified sources flaws the finding of no significant impact. Since a detailed set of construction plans and specifications is not available, it would be difficult to assess the total extent of tree loss and associated habitat impact. This number of 403 trees removed is at best, a guess and unsubstantiated.

9-8

Clearing and grubbing for proposed construction activities

Clearing and grubbing will need to occur prior to any of the proposed construction. The convention center is 70'-0" x 250'-0" with 2 adjacent parking lots. The parking lots are 60'-0" x 240'-0" and 60'-0" x 160'-0" according to the scale provided. Clearing and grubbing will be necessary for large equipment to deliver and place materials needed during construction. A beach 50'-0" x 200'-0" is proposed. To grade and contour the beach area, and deliver and place sand for the beach, a temporary road will be required. This will enable grading equipment and dump trucks to access the beach area for construction. The installation of utilities will be necessary for gas, electrical, water, wastewater and communication requirements. Routing locations of utilities are not available. The location of the wastewater treatment facilities is not shown or documented in the EA. The scope of this construction work is extensive. MYCA is not qualified to oversee a project of this scope. In the event that construction of the compound and convention center would occur, who is to oversee this construction? What methods would be used to mitigate the adverse effects associated with a large-scale construction project in an environmentally sensitive area? Without some details as to how construction is to be monitored, the finding of no significant impact is inconclusive.

4-8

Wastewater:

Wastewater structures are not located on any diagram in the EA, It is conceivable that the location of a wastewater disposal system, **if permitted by state environmental regulations**, may have to **be** located hundreds of yards from what would be the main compound area, This requires that gravity sewer lines be properly installed with slope to the drainage field. The topography is such that very deep excavations may be necessary to insure proper slope and flow of sewerage. Due to distances and topography, a pumping station may be required. None of this is discussed in the EA. The finding of no significant impact without detailed engineering design of the wastewater treatment facility showing locations of pertinent sewer structures, pipe sizes, and slope is inconclusive. The Iowa Department of Natural Resources (**IDNR**) typically oversees construction permitting of proposed wastewater systems. Prior to the (**IDNR**) approval, detailed engineering plans and specifications are required to be submitted to the IDNR for review and approval. These submitted plans will be required to show exact site location of the treatment facility and appurtenances with respect to property lines and adjacent homes. Other engineering information will also be required--the size, location and capacity of sewer lines will be required. Without this detailed information, permitting for the wastewater treatment facility from the **IDNR** would be denied.

13-17

The State regulations require 1000.00' set back between sewage treatment and residences and 400.00' from water impoundments. Since a detailed engineering plan is not available locating the wastewater treatment system and all its essential appurtenances, it is impossible to assess if a project of this magnitude is even feasible. As indicated previously in this text, maps 4-2 and 5-1 are either inaccurate or do not provide sufficient data to reliably locate a waste treatment facility.

13-19

The EA indicates percolation tests were performed; however, the location of the tests is not given. Typically percolation tests will be done over the area where the leach field is to be installed. The findings of the percolation tests in the EA are meaningless unless they are in the immediate vicinity of the proposed leach field. The leach field is not located; therefore these tests are potentially invalid. Leasing the property without these wastewater issues being resolved would be irresponsible. A finding of no significant impact is inconclusive.

13-21

Traffic Studies:

Information for traffic in and out of the proposed convention /recreation center/compound is provided by MYCA. MYCA has not run a camp. MYCA is not qualified to provide this essential data. Not included in the traffic number are staff and service personnel that will do day-to-day chores required for the maintenance of a large compound and convention center. Many of these personnel could be **full** time workers, many may be part time workers or volunteers. These people will travel in and out daily. Services for food and required supplies will have to be delivered by car or possibly trucked in on a regular basis. Refuse pickup and hauling will be required. Personnel involved in special events will travel to and from the compound. None of the above are considered in the traffic equations. The estimate of 50 vehicles per day (vpd) is at best a

22-6

guess, not an accurate engineering assessment. Again, use of data from unqualified sources lends no credibility to the EA. The finding of no significant impact is inconclusive,

The Corps of Engineers needs to give serious attention to these issues,

Regards,

Mark Kinney, P.E.
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