

Hagerty, Karen H MVR

From: WELSHBOB@aol.com
Sent: Thursday, December 26, 2002 4:12 PM
To: Hagerty, Karen H
Subject: Comments on Environmental Assessment - Coralville

MEMORADUM

To: US Army Engineer District, Rock Island
ATTN: Planning, Programs and Project Management Division (Karen Hagerty)
From: Bob Welsh
Re: The Environmental Assessment of the Proposed Lease at Coralville Lake
Johnson County, Iowa
Date: December 26, 2002

There are several comments that concern me relating to the Environmental Assessment of the proposed lease to MYCA.

33-15 [1. On page 1 - "The purpose of the EA is not to evaluate a specific application or applicant." My questions is, when and when is the specific application and applicant evaluated and by whom? I request that I be informed when by whom the specific application and applicant will be evaluated. I would like input into that process.]

13-5 [2 Page vii - "The MYCA Lease (and Reduced Use Alternative) does not meet current state standards for location of wastewater treatment facilities." I am disturbed that Zambrana Engineering, Inc. seems to be suggesting that the standards be changed or a waiver obtained. The purpose of state standards is to protect the safety of the citizens of Iowa and developments should comply with the state standards rather than the state altered to fit a proposed development. If it does meet the standards the case should be closed.]

31-2 [3. **There** are many inconsistencies in the assessment:
a) The number of employees: Page 16 "16 permanent jobs at camp," page v "16 staff per day for 16 weeks during the summer months."
b) The proposed is as outlined on page v state that during the summer the camp would serve "Muslin and non-Muslim youth." The Articles of Incorporation has the MYCA objective "for youth of the Islamic faith."
c) Page v states construction of **10** cabins, 12 tent camping platforms, page 2 states "the lodge could house 32 campers and the tents up to 96 campers. Again on Page 7 a lodge is not considered in calculating water demand.

The inconsistencies make me wonder on what set of figures the EA was made. If the variations make no difference then I do not understand what an Environmental Assessment is about.

3-1 [4. Will the lease limit the number of persons to 120 campers for 10 weeks during the summer month and up to 4,000 users over the course of the remaining year? The 4,000 over a 42 week period averages 95 persons a week. The projections on page 48 to spend \$185,400 on food and supplies suggest a larger number. The 95 person average also causes one to wonder about the economic feasibility of a full-time caretaker. What happen, if the use exceeds the amount projected? Since the EA is based on these numbers, these numbers should be the limit set in the lease and a higher use should void the lease with all improvements becoming the property of the Corp.]

6-1 [5. The Master Plan (Page iv) allocates "project lands for nonprofit recreational use." The MYCA is far more than "recreational use." The Corp administrative policy requires that land use decisions should take into account interest and be consistent and compatible with national objectives and other state and regional programs. From my perspective the majority of the public is opposed to the proposed use and the governmental units, Johnson County and North Liberty, most affected by the proposed lease are opposed to the plan. This is reason enough for the Corp not to proceed with the proposed lease.]

2-14 [6. You now have a non-profit entity interested in leasing the property and that non-profit entity's plan would not

have the negative environmental Impact of the MYCA and less of a **negative** environmental Impact than the Reduced Use Alternative. Many of the assumptions in the Reduced Use **Alternative** are probably not accurate. **3**

- 9-3 [7. The loss of 403 trees and 4.8 acres **terrestrial** habitat, contrary to the report, has a negative **environmental Impact**, as does the conversion of **wetland**.]
- 18-1 [8. To say concerning "demographics" (Page 16) that the MYCA **lease** has "no significant Impact" is contrary to the views of Johnson County and North Liberty. Since these are the entities that deal daily with the infrastructure it seems only logical that the Corp would not act contrary to **their** wisdom.]
- 19-1 [9. To say "no impact to property value" (Page 17) is certainly contrary to the views of the owners of the properties that would be most effected. **Is** Zambrana **Engineering**, inc. willing to guarantee the **residents** that this development will have no impact of their property value? If not, this statement should not hold any **weight**.]
- 5-8 [10. In the original proposal made to the Johnson County Board of Supervisors **MYCA** spoke of this being a center to draw persons from around the world. Although this does not seem to be considered in the EA it is a factor that **needs to** be taken into account in considering the lease. The unfortunate events of September 11, 2001, raises concerns that must be addressed.]

MY CONCLUSION: The Corp, at this time, should not lease the property in question to MYCA. This is a radically different use of the property than when used by Camp Daybreak. The Corp should then indicate that it is open to a proposal by Johnson County and/or North Liberty and others. This, I believe, would be a win-win situation for **most** persons.

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