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**Ms. Karen Hagerty**  
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Dear Ms. Hagerty,

**This is an** addendum to **my** letter dated 12/23/03. That letter **was** divided into nine sections.

The sections were titled **as** follows:

- Section 1) The EA inappropriately re-interprets land designation in the Master Plan.
- Section 2) The EA misstates facts about the osprey nesting site.
- Section 3) The EA incorrectly evaluates vehicular traffic and parking.
- Section 4) The EA incompletely and inaccurately accounts **for** water demand.
- Section 5) The EA has **an** incomplete assessment of well drawdown.
- Section 6) The EA incorrectly locates community wells and occupied residences.
- Section 7) The EA exaggerates the north-south span **of** the proposed lease property.
- Section 8) The EA incorrectly evaluates the impact **of** noise.
- Section 9) The EA does not evaluate the effect of light pollution.

**In** this addendum, I would like to better define my concerns outlined in Section 1 of **my** letter. In addition, **I** discovered an error in my calculations for vehicular traffic contained in section 3 (Method 3). This addendum is divided into two parts.

Part 1 – correction to Section 1 of my letter dated 12/23/02

Part 2 – correction to Section 3 (page 6) of my letter dated 12/23/02.

Neither the correction to Section 1, nor the correction to section 3 will alter the conclusion that a FONSI cannot be determined because the EA is not a valid study.

**Part 1 – correction to Section 1 of my letter dated 12/23/02**

In my letter dated 12/23/02, I stated that the EA inappropriately re-interpreted the land designation used in the 1977 Master Plan. I again reviewed the original bound 1977 Master Plan Volumes 1 and 2, along with the appendixes. Upon further review I do not believe the **EA** re-interprets the land designation as high intensity recreation. Such a novel re-interpretation would likely constitute intrinsic fraud. Instead I believe the EA is in error due the poor quality of Figure 10 on page 67 in the electronic (PDF) version of the 1977 Mater Plan. **An** honest error based on the poor quality of the electronic image would not necessarily constitute intrinsic fraud.

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**I** will describe the land use maps for the site in the original bound versions of the Master Plan. Figure 10 on page 67 of the 1977 Master Plan Volume 1 is a reduced version of the map shown on page 2 (the page following the title page) of Volume 2 of the 1977 Master Plan. The map on page 2 of Volume 2 shows the leased area of the Girl Scout camp as hatched and the key to the map defines the hatched pattern as “leased lands (existing use)”. Although Figure 10 on page 67 shows the same hatch pattern, the key does not include the designation “leased lands

(existing use)". Instead, the meaning of the hatch pattern is not defined in Figure 10, page 67 of Volume 1. However, the pattern for "recreation - intensive use" is defined as solid black in Figure 10, page 67. The area leased to the **Jolly** Roger campground is black and is designated "recreation - intensive use". The site leased to the Girl Scouts (Cardinal Council of Girl Scouts) has a hatch pattern. Therefore, Figure 10, page 67 of the original bound 1977 Master Plan Volume 1 clearly distinguishes between the site leased to the Girl Scouts and those sites that are "recreation - intensive use." The site leased to the Girl Scouts clearly is not "recreation - intensive use."

The electronically reproduced version (PDF) of the 1977 Master Plan is less clear. Figure 10 did not reproduce well. This is likely the source of the **Corps** error. In the electronic version, the site leased to the Girl Scout camp has lost the hatch pattern and is black. The key to Figure 10 did not include a definition for the hatch pattern. **Thus**, the apparently black pattern of the **Girl** Scout site can be mistakenly interpreted as "recreation - intensive use". This error **can** be made due to the **poorly** reproduced image of Figure 10 in the PDF version. The electronically reproduced version of the 1977 Master Plan is not **an** accurate copy. The original **bound** 1977 Master Plan Volume 1 clearly distinguishes between the site leased to the Girl Scouts and those sites that are "recreation - intensive use."

Recall that Figure 10 on page 67 of Volume 1 is a reduced version of the **map** on page 2 of Volume 2 of the 1977 Master Plan. The key on page 2 of Volume 2 defines the hatch pattern as "leased lands (existing use)". The use of the site is described in the Master Plan. The site is shown in plate C-2 of the Appendix to the Master Plan and is enumerated as E-412, E-409, E-411, and E-408. All are leased land (VI). Page 4 of the appendix designates the use.

"Tracts #E-401, 406, 408, 409, 411, 412, 414, B-114

Natural selection will follow here."

Note that the "wildlife practices" for the "recreation - intensive use" sites are much different than the "natural selection" use dictated for tracts E-408, 409, 411, and 412.

The Natural Resource Inventory Survey (**NRIS**) of 1990 also defines the non-intensive "existing use" of the site. The **NRIS** enumerates the site as segments 7, 8, 9, 10, 11, 12, and 15. Segments 7, 8, 9, 10, and 11 are **low** density recreation. Segments 12 and 15 are reserve forest. **Low** density recreation permits primitive camping. The Girl Scout camp use was consistent with the 1977 Master Plan designation and the **NRIS** "existing use" listing for the site. The location (segment 15) for the proposed two story 17,500 square foot lodge is listed as reserve forestland by the **NRIS**. The 1977 Master Plan "existing use" designation does not permit building a large conference center on this site.

**As** I pointed out in my letter dated 12/23/02, the shoreline **of** the site leased to the Girl Scouts is designated in Exhibit 4 of Appendix **F** (Lakeshore Management Plan) to the 1977 Master Plan as "Protected Lakeshore". Protected lakeshore is defined in Appendix F of the Master Plan as "Protected Lakeshore - No private or public development. Environmental area." The sites designated as "recreation - intensive use" do not have protected lakeshores. This provides more support that the site is not designated intensive use. Figure 10 on page 67 of Volume 1 does not show the protected lakeshore designation for the Girl Scout site although this is clearly shown in Exhibit 4 of Appendix F. It is possible that the Corps and Zambrana overlooked this designation because it is not included in volume 1. However, the fact that the site is designated protected lakeshore prevents development of the beach as proposed by MYCA.

As I outlined in my letter dated 12/23/02, a major (if not **THE** major) basis for the FONSI is that it is most consistent with the 1977 Master Plan. However, the assertion that "the Corps

Master Plan designates the project site for recreation/intensive use” is false. A FONSI cannot be determined because the EA is falsely asserts that the site is designated recreation – intensive use. The proposed use most consistent with the 1977 Master plan would be low density recreation (including primitive camping), protected lakeshore, and reserve forest. This use is less intense than that proposed as alternative 2

The erroneous assertion that “the Corps Master Plan designates the project site for recreatiointensive use” is likely based on the poorly reproduced image of Figure 10 (page 67) that lacks a complete legend (key). An honest error based on the poor quality of the electronic image would not constitute intrinsic fraud. My letter and this addendum informs the Corps (and Zambrana) that the EA, as approved by Colonel William J. Bayles, contains major errors by falsely asserting that the Corps designates the project site as recreatiointensive use. Continued assertion that the site is designated as intensive use will likely constitute intrinsic fraud.

**Part 2 – correction to Section 3 (page 6) of my letter dated 12/23/02.**

My original calculations for vehicular traffic in Section 3, Method 3: Depart Friday, Arrive Sunday (page 6) resulted in 284 vpd if all campers stayed for two weeks instead of one. This is incorrect. The correct figure for Friday is 164 (60 departing (120 vpd), day staff (36 vpd), bus (for alternate week student outings, 4), and other services 4). Sunday traffic also is estimated to be 164 (60 arriving (120 vpd), day staff (36 vpd), bus (4), other services (4)). Note that even with this lower estimate the vpd remains over 3 fold (300%) higher than the erroneous value (50 vpd) used in the EA. Also, the two week stay remains a difficult staffing problem. The camp counselors and staff would need to work at least two weeks in a row (24 hours a day for 13 days) without a day off. They would then get one day off (Saturday) before returning for another 13 day (24hrs/day) rotation. The most practical traffic estimate remains 280 vpd with the majority of campers staying for 6 days.

The corrected paragraphs in my letter dated 12/23/02 should read:

Method 3: Depart Friday, Arrive Sunday. One hundred and twenty (120) campers depart Friday. One hundred and twenty (120) campers arrive Sunday. One hundred and twenty (120) campers leaving on Friday will generate 120 cars driving to the camp and 120 cars driving from the camp (240 trips total). Day staff arriving and leaving will generate 36 trips. There would be no bus trips expected on Friday. There will be food delivery, garbage pick-up etc. Correct assessment of traffic by Method 3 for Friday results in more than 280 vpd (and assumes the overnight staff and caretaker never leave). Saturday would have less traffic as the camp prepares for Sunday arrivals. Perhaps the overnight staff will be allowed to leave. On Sunday, the arrival of one hundred and twenty (120) campers will generate 120 cars driving to the camp and 120 cars driving from the camp (240 trips total). Day staff arriving and leaving will generate 36 trips. There would be no bus trips expected on Sunday. There will be food delivery, garbage pick-up etc. Correct assessment of traffic by Method 3 for Sunday results in more than 280 vpd (and assumes the overnight staff and caretaker returned before Sunday). In the very unlikely event that all campers must stay for two weeks instead of one, the correct assessment of Friday or Sunday traffic by Method 3 results in 164 vpd (60 departing (Friday) or arriving (Sunday) (120 vpd), day staff (36 vpd), bus (for alternate week student outings, 4), other services (4 vpd)). The EA is incorrect in determining 50 vpd as the basis for its traffic analysis if MYCA plans to use Method 3, unless the EA focused only on Saturday traffic.

Note that Methods 1 and 2 are not practical from a staffing standpoint. Recall that MYCA has no experience running camps. Usual camp turnover is by Method 3. Method 3 allows counselors and overnight staff to have weekends off. Method 1 and Method 2 require counselors

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and overnight staff to work 24 hours a day, seven days a week, for the entire summer. The most practical traffic pattern is that produced by Method 3 that produces 280 vpd if the campers stay for one week (6 days) or 164 vpd if the campers stay for two weeks (13 days). There is no usage pattern that produces 50 vpd as used by the EA for its traffic assessment.

In summary, this note serves as addendum to my letter dated 12/23/03. This addendum corrects Section 1. My original letter stated that the EA re-interpreted the designation "leased land\*" as "recreational - intensive use." Such re-interpretation would likely constitute intrinsic fraud. Instead I believe that the Corps and Zambrana erroneously attributed the designation "recreational - intensive use" to the site due to poor reproduction of Figure 10 on page 67. This honest error would not necessarily constitute intrinsic fraud unless it is not corrected. This addendum also corrects a calculation error present in Section 3 of my letter dated 12/23/02. Neither the correction to Section 1, nor the correction to section 3 will alter the conclusion that a FONSI cannot be determined because the EA is not a valid study.

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Sincerely,



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