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December 26, 2002

Ms Karen Hagerty, Planning, **Programs**, and **Project** Mgmt Division
Department of **the Army**
Rock Island District Corps of Engineers
Clock Tower Building - P O Box **2004**
Rock Island, Illinois **61204-2004**

**RE: Proposed lease of Camp Daybreak, Coralville Lake, North Liberty, Ia
Official Public Comment in response to Environmental Assessment**

TOPIC: ESTIMATED USERS/ALTERNATIVE#1 MYCA

Dear Karen:

I would like to contest the number of users estimated by Myca/Zambrana/Corps of Engineers for Alternative#1/MYCA lease.

The **EA** projects the number of users at **13,500** annually (**136** daily users x 7 days per week x 10 weeks = 9500 user days in summer, plus **4,000** non-summer users).

The **136** daily users is defined as 120 campers and **16 staff**.

The **4,000** non-summer count **is** based on "18 weekends per year would experience some conference/retreat activity. With approximately 45 to 100 attendees per weekend, these activities would generate 800 to 1800 users. Family retreats on six to eight weekends are projected to generate another 180 to 450 users. Additionally, 1,000 users are projected to be generated by 10 weddings." This is 34-36 events per year.

The 17,500 square foot central lodge is designed to accommodate 150-200 persons (page 4 of EA). **If** we recalculate the above 36 events using 150 to 200 persons per event, we get 5,400 to 7,200 non-summer users, for a total of **14,900** to **16,700** (assuming all non-summer events are one day events).

The EA states that MYCA's plan is to "actively market" use of the retreat/conference center. The EA also states that "between 1-3 conferences could occur during the week" in addition to the weekend usage (see page 7 **EA**), If we add one weekday event each week for 40 weeks, using 50 persons, we get **an** additional 2,000 users.

This results in counts of 16,900 to 18,700 annually (assuming all non-summer events are one day events). This is 25-38% more usage than the estimate in the EA.

There are many possibilities that could result in even more users. Will the non-summer events ever be multiple-day events (the EA states "though the site would only be able to house up to 80 people per night in permanent lodging structures during the non-camping

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season, additional lodging and dining is available locally within a 5-10 minute drive”.

Will there ever be conference/treat activity in the summer while the camp is in session?

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Will the families of campers ever be asked to events during the summer, thus resulting in many more users than the estimated 136? Will the computer training center ever be used daily for day or night classes? Have employees/service personnel been included in any counts?

The estimates used in the **EA** seriously underestimate the possible number of users under Alternative#1. A responsible study would look at the maximum numbers allowable by the design, not a guesstimate provided by the proposed lessee.

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The estimated numbers used obviously affect conclusions drawn in the Environmental Assessment, most significantly traffic, parking, water usage, and wastewater treatment. I believe that using the maximum numbers allowed by the design would have a significant impact on the conclusions drawn. I believe the numbers used in the EA clearly underestimate potential use, result in inaccurate conclusions, and should not be used to support a Finding of No Significant Impact.

Sincerely,



Lynne M. Kinney
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North Liberty, Ia 523 17

CC: Grassley, Harkin, Leach