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December 31, 2002

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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: EA Inadequacies/FONSI

Dear Karen:

Many people have written to you about errors/omissions/and inaccuracies in the **EA** provided by Zambrana Engineering to the Corps of Engineers regarding the proposed lease at Coralville Lake.

I have reviewed other EA's prepared by governmental agencies, including the Corps of Engineers, and I find items that are routinely covered in detail in other EA documents that are for the most part ignored or very lightly treated in your **EA**.

These relate to two major areas: construction impacts and impacts occurring outside the project area.

Mitigation measures for construction related activities to lessen the potential for adverse impacts are routinely covered in Environmental Assessments. You do not cover any of the following:

- Staging area for construction office (where located)
- Methods for returning staging area to pre-construction conditions
- Methods for controlling dust during construction
- Methods for controlling noise during construction
- Instructions for construction vehicle idling to reduce noise and air quality impacts
- Fencing to define construction area and confine activity to minimum area required for construction
- Protection measures to be clearly defined to workers to avoid conducting activities beyond the construction zone
- **A** revegetation plan
- Plans for prevention of the spread of exotic vegetation
- Tree, pruning guidelines for construction workers
- Plan for daily construction clean-up
- Plan for preventing water contamination by vehicle fuel leakage A spill plan.

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- Plan for handling previously unknown archeological resources discovered during construction.
- Plan for minimizing soil erosion
- Plan for excavated material
- Plan for restoring soils compacted during construction
- Variations on construction timing to minimize impacts of noise from construction activities to neighbors and the area's natural quiet
- Traffic plans for construction vehicles to minimize disruption to neighbors
- Emergency plan for construction accidents

The EA's where I found these mitigation plans are for projects smaller than what you have proposed in Alternative #1. The construction impacts noted in your EA significantly underestimate the construction impacts both within the project area and outside the project area. You have no mitigation plans in the EA for construction related adverse effects, although you state that the construction will last over a two year period.

Your EA, in general, gives short shrift to impacts occurring outside the parameters of the project compared to other EA's I have reviewed. These include:

- Dust from increased traffic on 200th Street, both from construction and post-construction traffic (no mitigation plan)
- Wear and tear on county roads from both construction and post-construction traffic.
- Noise from both construction and post-construction activities (no mitigation plan)
- Light effects from both construction and post-construction activities (no mitigation plan)
- Plans for potential safety hazards – school children walking to school bus stop on 200th Street
- Plans for potential safety hazards – risks associated with increased traffic, including buses turning onto and off of 200th Street at Scales Bend Rd
- Costs to county taxpayers due to need for increased services (such as road improvements and additional fire-fighting equipment)
- Visual changes to the natural aesthetics of the area

These impacts occurring outside the parameters of the project area are especially significant in light of the fact that residences are located within several hundred feet of the proposed main conference center building; and thus within several hundred feet of the majority of the construction activity and the staging area for future events at the proposed facility.

The following information is quoted from the "NEPA Call-In" website. It is from a GSA guide to implementing NEPA policies.

7.4 Actions that normally require an EIS

The following actions are considered to be major Federal actions significantly affecting the quality of the human environment, and therefore must be the subject of EIS's, as must any other action that an EA indicates may have significant environmental effects:

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- Master plans for Federally owned major buildings, building complexes, and sites (Note: EIS should be designed so that subsequent EISs and EAs can be tiered off it).
- Acquisition of space by Federal construction or lease construction, or expansion or improvement of an existing facility, where one or more of the following applies:
- The structure and/or proposed use are not substantially consistent with local planning and zoning or any applicable State or Federal requirements (see NEPA-Related Legal Requirements and Their Implications, Appendix 3);
- The proposed use will substantially increase the number of motor vehicles at the facility
- The site and scale of construction are not consistent with those of existing adjacent or nearby buildings; or
- There is evidence of current or potential community controversy about environmental justice or other environmental issues.
- Space acquisition programs projected for a substantial geographical area (e.g., a metropolitan area) for a 3-to-5-year period or greater (Note: a PEIS is often appropriate here, off which subsequent EISs and EAs can be tiered).

While I realize that GSA is not the Corps of Engineers, my understanding is that **NEPA** and **CEQ** requirements apply to all federal agencies. I would appreciate your reaction to the above. I can give you the website address if you would **like** it.

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Based on the errors/omissions/inaccuracies in the EA, the failure of the **EA** to address mitigation plans for construction impacts and impacts occurring outside the project area, and due to the fact that the proposal 1) is not consistent with local planning and zoning ordinances, 2) substantially increases the number of motor vehicles at the facility, 3) site and scale is not consistent with existing nearby buildings, and 4) there is community controversy, a finding of no significant impact is not appropriate, and a Environmental Impact Statement should be prepared if this proposal is to be considered for further review.

Sincerely,



Lynne M. Kinney
 3530 Cumberland Ridge Rd NE
 North Liberty, Ia 52317

CC: Grassley, Harkin, Leach, Johnson County Board of Supervisors, N Liberty City Council

