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From: lorie leo [lleo@la.net]
Sent: Thursday, January 02, 2003 1:31 AM
To: CampDayBreakEA@mvr02.usace.army.mil
Subject: MYCA EA

December 30, 2002

Department of the Army

Rock Island District

Corps of Engineers

Clock Tower Building

P.O. Box 2004

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Attn: Planning, Programs, and Project Management Division (Karen Hagerty)

Ms. Hagerty,

general
public
comments

As a landowner adjacent to the proposed MYCA property, I have studied ZEI's EA carefully. I have several questions and concerns.

6-9 [The report's executive summary (pg. iv) states that the proposed lease site has previously been leased to other nonprofit organizations for similar nonprofit recreational use and purposes. This is simply not true. In fact, the next page states that Alternative #2 was specifically intended to better reflect what had existed there before. The scope of the Alternative #1 proposal dwarfs anything the Corps has ever done on that property. A quiet neighborhood now exists in the vicinity, people who evaluated the presence of the scout camp before buying, and who have been excellent neighbors to the previous lessees of the property. A convention center of this magnitude is inappropriate for such an area and is a drastic deviation in zoning. The Girl Scouts vacated in 1991. Volunteers from that era indicate that the organization was not permitted to make even a fraction of the drastic improvements/alterations that MYCA plans the site. Why not?] 33-18

-3 [If, "very little opportunity exists within the Corps managed or leased recreation developments to meet the needs of non-profit group activities" why, when the land became available, was there no attempt in 7 or 8 years to approach nonprofit organizations about leasing?]

7-1 [What are the "national objectives" (referred to on pg. iv) with which the land use decisions need to be consistent and compatible, according to Corps policy? What document containing these objectives is available to the public? Is there a specific national directive for the Corps to provide sites for wedding receptions?] 7

Site analysis of North Point as an alternative location was conveniently deemed unnecessary,

due to its lack of adequate forest cover, How much forest cover is required to grade and construct a 70 x 250 foot lodge, an access road, 66 parking spaces, a residential dwelling, 10 cabins, 12 platforms, septic fields, possible underwater potable water storage (pg. 6), a large sand beach, and numerous trails. The plan states the loss of 405 trees has no significant impact because most of them are not that big. MYCA has pledged to replace the trees removed. Why would **ZEI** not even consider having **MYCA** build at North Point without having to worry about existing trees in the wrong place, and then plant their new ones in just the right spot? It would preserve these existing pristine woods AND revitalize the other parcel into something special. This would seem like better stewardship of the land entrusted to Corps jurisdiction. Also, the report states that this estimate for tree removal is based on using the same footprint already established by the girl scouts, even though the plan clearly indicates this is not so! If there is deviation from this footprint, that number will go up. In fact, Section 5.1.4 suggests that wetland resources would be better preserved if the location of an existing trail and tent platform were indeed shifted. **MYCA's** planned deviation from the existing Girl Scout footprint will make the tree removal estimate **ZEI** made invalid.

2-4

9-25

In contrast to what I read in the report, Corps maps I have seen indicate that this MYCA lease area includes a protected lakeshore area, explained as being an environmental area with no private or public development allowed. **This** makes sense given the wealth of flora and fauna. Someone in the **Corps** recognized its value and tried to protect it once upon a time. The land itself appears to be designated for recreation - low density use, not high intensity as **ZEI** states in several places.

6-1

The quality of the maps is poor and some are "simplified" and thus not 100% accurate, I realize. Still, there seem to be other glaring inaccuracies, particularly the location of the wells and residences. This may have some bearing on wastewater treatment location.

13-b

I have major concerns about compliance by the lessee. ZEI frequently uses the word "may": 5.2.1. "Erosion of site soils MAY be mitigated during construction activities using best management practices.. ...MAY include silt fences, buffer strips... runoff MAY be mitigated through installation of appropriate site detention structures." These concerns extend into many other issues besides water runoff - noise, training of camp personnel, architectural design are just a few. I realize these are lease issues, ultimately, but if the ZEI staff is simply making assumptions, their **FONSI** is invalid. **If** the report does not address who will decide what the lessee is SPECIFICALLY required to do and who will monitor it, and how it will be enforced, it is impossible to say there will be no impact because we don't know what will exist there. We have seen numerous versions of this convention center and the size and shape are always changing. ZEI says there will be "no significant aesthetic impact due to the incorporation and integration of the architectural design and site development into the landscape." Who is going to decide what design looks unobtrusive and are they able to assure that this is the design MYCA ultimately uses? What are the steps involved in that plan approval process?

3-1

23-1

I hope I am wrong, but pg. 19 seems to indicate that there were only two field visits made to the site, is that true? I have lived next to this property for 22 years and many things I have seen only on rarest of occasions - ferrets, salamanders, piliated woodpeckers, coyotes. Years ago, one of the leading birders in the state was astonished to learn that a barn owl routinely perched on the mast of a catamaran parked in our driveway, and she said no one had seen a barn owl in the area for many years. The Indiana bat is a genuine concern. Richard Nelson's report says if the bat exists, its habitat cannot be destroyed. Were two visits enough to determine the bat's presence or the presence of any other endangered species?

12-9

Why will the lessee be allowed to build a private residence on government property? If it is for security, does that mean someone MUST be there at all times? If not, the security is non-existent and superfluous. Will the security guard be armed? 3-2 5-1

Section 5.8: Are the Girl Scouts required to bear the cost of site cleanup before MYCA builds? 33-1

Noise is a major concern. In spite of the distance, the presence of the high ridge, and the large tree mass cited in the report, on summer evenings we already hear conversational noise from houseboats parked near the area proposed for MYCA's tent pads, Yet adding 100 youth won't impact the noise level?! What information leads ZEI to say that the only activities after dark will be campfire events?! About 10 years ago, Camp Daybreak became "Wapsi South" (part of Camp Wapsi) for a few weeks in the summer, with MANY dozens of day campers. Please inform Mr. Toolen that the increase in noise level during those weeks was in fact QUITE discernible to the human ear, no matter what his PREDICTION model indicates. 25-1 25-7

Incidentally, those Wapsi South weeks presented traffic/turnaround problems, near accidents, and problems with large vehicles. Inadequate garbage collection leading to overflowing dumpsters at the camp entrance since the trucks refused to venture down the canopied lane. Buses also found it dangerous to maneuver and the camp quit using the facility.

The public is free to use the leased waterfront and yet MYCA will be able to decide how to manage the premises and provide safety and security for their campers. Which takes precedent? How will confrontations be settled? (See why I am wondering if the guard will be armed?!) 3-3

According to the report, on three separate occasions in 2000 Mr Rosenberger requested information from Mr. Farraud regarding a possible wastewater treatment setback variance and yet now, two years later there is still no official response in the report. Was there simply no response or is it missing? I share the same concerns as Wayne Farraud expressed to Mr. Rosenberger via telephone, regarding smaller semi-public waste treatment systems, that it's "not so much the initial installation, but follow-up operation and maintenance procedures, i.e. who will be around to insure proper compliance in the future?" 13-1 13-2

How/why is the proposed plan only partially compliant with the Clean Water Act at this point? There are apparently some concerns about the FAST system of handling waste. Is there any way to be sure that human waste will not run off into the Iowa River? Again, who will monitor? What are the penalties for violation? 13-3 3 13-25

I found the report vague and downright inaccurate, with absurd conclusions being drawn based on unwarranted assumption. Once this property is inaccessible to the recreation public, it is too late to discover errors and reconsider. Detailed implementation, compliance and control of the MYCA proposal will take effort, expense, and manpower – and this report says the Corps has that responsibility. We will know who to call, and who to hold accountable, at least that much is clear.

Sincerely,

Lorie Leo

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