

GP 62

December 30, 2002

Rock Island District Corps of Engineers
Clock Tower Bldg. P.O. Box 2004
Rock Island, Ill. 61204-2004

ATTN: Planning, Programs & Project Management Division

RE: EA of Proposed Lease at Corallville Lake, Johnson County, IA

The Recommendation of approval of the Draft Finding of no Significant Impact presented by Zambrana Engineering, Inc. should be declined for the following reasons:

1. The assessment is replete with errors rendering the impact of the MYCA 1st alternative much less significant than what it reasonably will be. The EA has failed to correctly define such basic information as the private property lines existing bordering the Corps property in question. Zambrana's Figure 4-2 completely excludes the housing development of Cumberland Ridge II as well as the residential properties along Scales Bend Road. This misrepresentation presents a mistaken view of the area in question as being surrounded by upland forest property as opposed to private residential properties. The impact of the camp proposal is significantly greater located in a residential area as opposed to unoccupied park or forest area. Along with the misrepresentation deleting residential properties from consideration, Zambrana has failed to identify wells and to properly locate those wells that they did identify. These considerations are fundamental to the location of waste systems proposed in the MYCA plan. 31-7
2. Zambrana has significantly underestimated the dangers presented by additional vehicle traffic as presented by the EA. They have failed to analyze the impact of additional traffic at the intersection of 200th St. and Scales Bend road. The analysis disclaimed any impact of geometry where recognition of the unique geometry is essential to an understanding of the effects of the increase in traffic, particularly the proposed bus traffic, to this intersection. 200th St. enters Scales Bend on a tight curve where there is limited visibility. It does not enter at a 90 degree angle like an urban street. Scales Bend falls away from 200th St as one enters onto it from 200th St. resulting in numerous cars ending up in the ditch on slippery days. It is a difficult turn to make under ideal circumstances. This intersection is already considered to be dangerous to the extent that the Iowa City School district does not send school buses down 200th St. The MYCA proposal traffic numbers hinge on the use of shuttle buses that would clearly be at risk making the turn. 22-2
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3. The EA relies primarily on traffic numbers provided in the MYCA proposal, Those numbers do not reasonably reflect the amount of activity planned in the proposal, The impact on the area has been based on unrealistic predictions of traffic and unspecified plans for off-site parking areas. The expected increase in traffic impacts every environmental aspect of the proposal from tree removal, water run off, noise pollution, light pollution, road wear and traffic accidents. At a minimum the public has a right to an accurate and specific traffic analysis statement and a description on how the project will be bound to the numbers and the Corps involvement in supervising the numbers provided that serve as a basis for the conclusions that the EA has reached.

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4. The EA has concluded that the Master Plan has designated this property as a 'zoned' recreation-intensive use. **THIS IS A FALSE STATEMENT.** The 1977 Master Plan does not designate this property as recreation-intensive use. The management zones have differentiated this property from the recreation-intensive use designation along with the other 'out grant' areas. The Lakeshore Management Plan has designated this property as 'protected lakeshore' area and again differentiated this area **from** the public **recreation** areas.

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5. The Master Plan is severely out-dated and the **EA** has apparently relied on the out-dated information rather than seeking current information on traffic and property designations in the area. It is incumbent upon the *Corps* of Engineers to manage this federally owned property in a responsible manner and to update the Master Plan that serves as a guideline for property use. This area has experienced considerable residential development since the original planning conducted by the Corps. The Master Plan does not provide reasonable notice to the public and to those who have purchased real estate in the area regarding uses that the EA now claims are within the purposes being claimed.

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6. A more thorough EA was provided in the 1980's when a proposal was analyzed for the building of a bathhouse on a previously designated campground. The current EA fails to provide a hard analysis as required by the NEPA. Little mention is made in the current EA of the impact of construction operations not only on the property itself, but also on the access roads and residential properties. No description has been analyzed regarding the size and types of vehicles used in construction and the duration of disruption anticipated.

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7. This project is of such size and nature to be a commercial venture contrary to any projects ever allowed on the Coralville Reservoir. To meet the obvious parking requirements and to provide fire protection and safety, it is likely that the actual destruction of upland forest property will be significantly greater than what is projected by the MYCA proposal, and adopted as fact, in the EA.

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Therefore, the Corps of Engineers should proceed with a complete **EIS** regarding this project and conduct a full update of the Master plan before engaging in an

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operation, **which will result in extensive costs to the** people of **Johnson County**
and the adjacent neighborhoods,

Sincerely,

Sylvia A. Lewis
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North Liberty, IA 52317

