

December 16, 2002

GP 87

Department of the **Army**  
Rock Island District  
Corps of Engineers  
Clock Tower Building  
P.O. Box 2004  
Rock Island, IL **61204-2004**  
Attn: Planning, Programs, and Project Management Division (Karen Hagerty)

To Whom It May Concern:

I am writing to challenge the draft Finding Of No Significant Impact in regards to the proposed lease by the Muslim Youth Camps of America of the former Camp Daybreak area at Coralville Lake.

There will be significant impact on the environment, the roads, the neighbors, the local governmental agencies and the entire community.

9-22 [The environment will be impacted in several ways. First, the **Muslim** Youth Camps of America proposal for the development of this project states that **403** trees will be removed from the site, including 103 hickory, **46** honey locust, **49 oak**, and **59** elm from the site. Forty four percent of these trees (177) are over **6** inches in diameter based on the study completed in 1999. Many of the other **226** trees are now over 6" diameter. It is difficult to comprehend that the removal and destruction of **403** trees bears no significant impact. How many trees need to be removed before there is an impact?]

13-24 (The site has no location for a wastewater treatment and disposal facility which meets the separation distances from inhabitable residences, wells and lakes. This is cause for great concern. A variance would have to be granted by the state of Iowa Department of Natural Resources. The minimum separation distances are determined to provide for negligible impact to surrounding areas. The reduction of these minimum separation distances would cause significant impact to the environment.)

13-11 [The EA states that the existing well is rated at **28,000** gallons per day. The demand for the development is estimated at **8,860** gallons per day. There is no data to support the claim that no drawdown of the aquifer will occur outside the site boundary. The depth of this well is similar to three private/semiprivate wells adjacent to the property. Current water usage from the adjacent wells is estimated at 4,000gpd. (16 residences x 4 residents x 60gal ea). The pumping of 8,860 gallons per day of water from the same aquifer could cause significant impact to the existing well users.]

10-2 [The EA states that no impact to the aquatic ecosystems is anticipated. However the act of constructing a 5,000 ft<sup>2</sup> beach will severely impact the area. How will such a beach be

constructed? A massive amount of **sand will** have to **be** brought to the area designated for the beach. **Will** the slope of the land where the beach is to built accommodate dump trucks? No access to this area exists without the construction of an access road and further removal/destruction of trees beyond what **has** already been mentioned. **What** about compaction and the long term effects of heavy equipment? The construction of a beach will have significant impact on the area

6-4

The land use classification for this tract of land was established in the Revised Corps Master Plan in 1977 and states that the land is suitable for intensive recreational activities. In 1977 the adjacent Cumberland Ridge neighborhood **was** not even platted. The population of Penn Township was less than half of what it is now. It is important to note that the consequences of the intended use of the land is different today than it was **25** years ago.

6-9

According to the **EA** the intended use of the land is consistent with previous use of the site. This is simply not true, The Girl Scouts use of the site was limited to summer use only. A maximum of 30 girls were present at once and no permanent housing structures were constructed. The Lodge consisted of an open air pavilion without windows or **indoor** plumbing. The site was not used **for** any off season activities by outside groups. The proposed use by the Muslim Youth Camps of America calls for the construction of **25,742 ft<sup>2</sup>** permanent facilities consisting of a main lodge, caretakers facility and **10 cabins**, 66 permanent parking spaces, 5,000 ft<sup>2</sup> **beech**, canoe house, floating boat dock in the water and an international village. This in no way compares to the former use by the **girl scouts camp**.

6-6

6-17

While the **A3 zoning** designation from the county, which the **EA** claims does not have **jurisdiction**, permits private recreational use of the land, it is incomprehensible that the proposed use is indeed private recreational use. Of the proposed 5,200 users per year, 4,000 or 76.9% is non-recreational for conferences, conventions, business retreats, **weddings**, etc. This is **not the** intended use of the site from the **Corp** or the County. Conferences, **business retreats**, and wedding receptions are commercial use and are not in **line with any land use plan**. This magnitude of usage would have a significant impact on the area.

22-11

With respect to the roads and parking, it is stated that certain special events at the site (not camping/recreational) such as weddings, conferences and meetings could generate in excess of 100 vehicles per day. Only 52 parking spaces are planned at the central lodge. Does this make sense? Twice as **many cars as** parking spaces and an increase of 100 cars per day on the gravel access road will have a significant impact on the neighboring areas and Scales Bend Road.

33-31

30-9

The Johnson County Board of Supervisors, City of North Liberty, Penn Township Trustees, and Cumberland Ridge Homeowners have all opposed this project due to the magnitude and the vast difference from any previous usage of the area. The lack of compatibility with the surrounding area is apparent. Environmental damages by the removal of hundreds of trees and lack of adequate spacing for water and sewer systems

a-11  
6-6 will cause significant impact to the area. The scope and scale of the proposal by Muslim Youth Camps of America is vastly different from the previous use by the Girl Scouts. The use of the area for conferences, weddings, receptions, and retreats is commercial and does not comply with any land use plan, either the Corp or the County.

We encourage you to reevaluate this project and agree that there will be significant impact if the Muslim Youth Camps of America is allowed to develop this commercial project on Corp land.

Respectively Submitted;

  
Dennis Tallman

  
Sarah Tallman

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**Cc:** Johnson County Board of Supervisors, City of North Liberty, Penn Township Trustees, Congressman James Leach, Senator Charles Grassley, Senator Tom Harkin

