

Coralville Environmental Assessment Government Comment Summary/Response

2 Alternatives

- 2-2 The EA failed to address all site lease locations for MYCA. MYCA previously bought private land on the northside of Coralville Lake located off Roberts Ferry Road.**

The property in question is owned by a familial relative of one of the MYCA board members. However, the landowner is not and has not been involved with the MYCA group and this proposed development. All project lands at Coralville Lake were examined to determine which lands would be appropriate for the proposed action. A determination was made that only lands designated Recreation/Intensive or Leased Lands were appropriate for the level of use and development proposed. All other project lands were eliminated from further evaluation. Only lands designated Recreation/Intensive or leased lands were considered viable options for this proposed lease. The area adjacent to the property in question is designated Reserve Forest and is therefore not appropriate for the level of use and development proposed by MYCA.

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- 2-3 Were there attempts by the Corps to lease property to other non-profit organizations at this site or other sites? What other groups have pursued a lease on the property?**

Historically, there have been three former leases to nonprofit organizations at Coralville Lake. This is the only recent attempt to lease property to a nonprofit organization. Corps regulations do not require competition to grant leases for recreational use to nonprofit organizations. Nonprofit organizations known to have an interest in leasing the site were asked to submit proposals for development and use of the site. Lease proposals were received from Camp IO-DIS-E-CA and Muslim Youth Camps of America.

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- 2-5 Proposed level of use is too exclusionary in that it does not allow public access at all times of the year.**

Vast areas of the project are open to general public access. The purpose of leasing for nonprofit group recreational use is to have a variety of recreational opportunities at the project. The lease to nonprofit organizations provides that the lessee agrees to make the site and facilities available to other nonprofit organizations on a first come, first served reservation basis when not scheduled for use by the lessee organization. The lease also provides that the lessee shall not forbid the full use by the public of the water areas of the project, subject to the authority and responsibility of the lessee to manage the premises and provide safety and security for the facility users.

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- 2-7 I am against the development of this land to the size of the proposed project area. A low-density project or an alternative with no development seems more appropriate. The scale of the proposed project is too large.**

The proposed project is located within an area designated by the Master Plan for use by an outgrant to nonprofit organizations. The proposed use of the site as a camp is consistent with the Master Plan designation of the site for Recreation/Intensive Use. Please see response to comment 2-11. The highest use alternative, Alternative 1, was based on the proposal outlined in the MYCA lease application. The EA evaluated the potential environmental impacts based on that proposal, as well as three lesser levels of use and development.

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2-10 Are the impacts of Alternative 1 significant? I believe they are not significant.

The analysis contained in the EA includes a finding of no significant impact to the environment.

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2-11 Why is the camp so large? Such a large camp goes against the Corp's Master Plan. A camp the same size as the Girl Scout Camp Daybreak seems more appropriate.

The Corps' Master Plan describes and delineates land use designations at Coralville Lake. This plan does not describe specific site density requirements. All proposed plans for development at Coralville Lake must be approved by the Corps prior to construction. The proposed development of former Camp Daybreak site by MYCA is for nonprofit group use only and is appropriate at this location, based on the Master Plan land use designation. The size of the camp is based on environmental sustainability, carrying capacity, and design factors. The impacts of the alternative uses with relation to size have been evaluated in the Environmental Assessment.

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2-16 I disagree with the finding of no impact if nothing is done. Doing nothing to "natural areas" creates negative ecological impacts.

The finding of no impact is indicative that there will be no change in the characteristics of the site.

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2-18 MYCA alternative is not appropriate for the site.

Alternative 1: MYCA Lease is consistent with the Master Plan, and is therefore considered an appropriate use for the site. Please see response to comment 2-11.

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2-19 The site is better suited for low impact outdoor recreational uses, considering the area is primarily a woodland and lake setting.

Low density outdoor recreation reflects alternative 3 which is not consistent with the Corps Master Plan. In addition, the site can sustain the impacts of high density use without significant adverse impacts as determined in the Environmental Assessment.

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3 Lease

3-3 How will MYCA and the public interact over the use of the lakeshore?

The lease provides that the lessee shall not forbid the full use by the public of the water areas of the project, subject to the authority and responsibility of the lessee to manage the premises and provide safety and security for the facility users. Please see response to comment 2-5.

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3-10 The Corps is planning to lease the land down to the water's edge which would restrict public access to the lakeshore and give MYCA lakeside privileges not provided to others. The public currently has access to this land and water by way of this land. Will the public have access under the MYCA proposal?

The development and use of this site as a nonprofit group recreation area will provide a higher level of recreational use than the site provides in its current state. While this use of the site by organized groups will require that open access to the site by the general public be controlled, the overall opportunities for recreational use is increased by providing an area that is developed and managed for organized group recreation activities. This site will serve another segment of the recreating public.

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3-14 Is a DNR approved water treatment system required before a lease is signed?

The Corps will require approval by the Iowa Department of Natural Resources for the wastewater treatment system prior to the commencement of the development on the lease area. If the Department of Natural Resources requires that the lessee demonstrate that they have control of the property prior to issuing the permit, the Corps will grant the lease subject to the lessee obtaining the permit.

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6 Purpose and Need

6-1 Land use designations and restrictions of the project are inconsistent with elements of Corps management and planning documents that pertain to Coralville Lake including the 1977 Master Plan, the Lakeshore Management Plan, and the Forest Resource Inventory (1990).

The Corps land use designations for the proposed lease site have been correctly interpreted and applied. Volume I of the 1977 Master Plan, page 29, describes all of the leased lands to non-federal agencies or groups at Coralville Lake for various forms of public use. This list includes lease of the Camp Daybreak site to Cardinal Council of Girl Scouts. All of these organizations and their associated development are considered non-federal recreation development. Another term used by the Corps for this type of development is "quasi-public" development, to differentiate it from federal or commercial development. Page 65 of the Master Plan states "Recreation/Intensive Use lands are those allocated for developments as public use areas for intensive recreation activities, including areas for concession and quasi-public development." Thus, the terms "leased lands" and "quasi-public" are synonymous and, as noted on page 65, are classified as Recreation/Intensive Use. Therefore the area is correctly identified as Recreation/Intensive Use for the northern portion of the site where the proposed development would occur. The proposed lease site is not labeled Recreation/Intensive Use in the map set, Volume II of the 1977 Master Plan for Coralville Lake, but instead the area is labeled "Leased Lands" for the northern portion of the site and "Reserve Forest" for the southern portion of the site. However, "Leased Lands" labeling is consistent with Recreation/Intensive Use.

Lakeshore The shoreline adjacent to the proposed lease area is labeled "protected lakeshore" in the Management Plan, Appendix F of the Master Plan. The purpose of Lakeshore Management Plan is to provide guidance on limiting private exclusive use of the shoreline. Corps policy requires a balance of resource protection and the promotion of safe, healthy use of the shoreline for recreation by the public. The proposed beach construction by adding sand to an existing sandy shoreline and placement of a summer canoe dock, which will be removed during the non-camping season, were evaluated in the Environmental Assessment. No significant environmental impacts were identified from these actions. Therefore, the integrity of the shoreline would not be compromised and these actions are within the allowable parameters of the Lakeshore Management Plan and the proposed nonprofit lease.

which used The Natural Resource Inventory System (NRIS), now obsolete, was an internal resource tool, different labeling systems than the Master Plan. In addition, the NRIS was an inventory resource tool and not used to determine land use. All planning documents at Corps projects are guided by the project's Master Plan. If there is any perceived conflict in land use designations, the Master Plan land use designations predominate.

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- 6-4 The Master Plan is outdated. The area has experienced considerable residential development since the original planning conducted by the Corps. Does the Corps "Master Plan" consider the changes that occur over years on property adjacent to federal land? Does it make sense to have an intensive-use recreational development within a couple hundred feet of private homes? If this is not considered, why not?**

The 1977 Master Plan for Coralville is the valid, approved plan for the long-term development and operation of Coralville Lake according to its Congressionally authorized purposes. Master plans consider the changes in the area, region, and nation when they are developed or updated, and designate appropriate land use. The Master Plan zoning and intended land use pre-dates the housing development and has been consistently applied since the inception of the project. The development of the Master Plan included coordination and review with local governmental bodies. It is a public document available to all interested parties, including developers and private individuals. Many housing developments have been developed around Rock Island District flood control reservoirs due to the attractiveness and values created by the project rather than the reverse. Current, existing conditions, including the impacts on existing homes adjacent to the federally owned Camp Daybreak area, were evaluated in the Environmental Assessment. This is also considered in the decision to lease the property.

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- 6-6 The project is of such size and nature to be a commercial venture contrary to any projects ever allowed on the Coralville Reservoir.**

MYCA is a nonprofit organization as designated by Iowa Code. The prime purpose of the camp and the facilities, which support the camp, are to serve youth activities. The object, in this case, is not to make a monetary profit. Commercial ventures are permissible at Corp water resource projects for facilities such as marinas, campgrounds, restaurants, hotels, etc. Current commercial leases at Coralville Lake include a marina and a campground.

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6-9 The proposed site is not consistent with the former use of the site as a Girl Scout camp. The new site has an increased number of users, a larger lodge structure, additional facilities, additional parking, and a greater increase in weekend use.

Though the proposed use and physical footprint of the Camp Daybreak site under Alternative 1 varies from the previous use by the Girl Scouts, it is consistent with the Master Plan, the land use designation of the site, and the previous use of the site. Please refer to the Environmental Assessment, Section 2.1 for a description of the Girl Scout facilities.

The 1970 annual report from the Cardinal Council of Girl Scouts documents revenues from 500 day campers and another 450 girls utilizing the area for troop camping on weekends, including during the winter. Records from 1973 document 1610 day campers and 973 weekend users. Finally, records from 1974 document Girl Scouts attendance of 841 for weekend troop camps, 64 for summer troop camps, 199 for summer day camps, 166 for day use, for a total of 1270 people. In addition, during 1974, Camp Daybreak was utilized by other groups including Camp Fire Girls, Mennonite Youth, Latter Day Saints, Tri-Parish Religious Youth, Boy Scout Troops, and several area school groups, for a total of 385 people.

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6-17 The proposed use, specifically the commercial oriented conference center, appears to be something other than outdoor recreation.

The off-season rental and availability of the facilities to other nonprofit groups for retreats, weddings, and other nonprofit activities does not constitute a commercial venture. Corps policy does not restrict such rental of nonprofit facilities on Corps' leased land; however, all such activities must be within the parameters of the lease agreement. Many of the elements of the proposed use as discussed in the EA – hiking, swimming, boating, outdoor education, and interpretation, etc., are outdoor and water resource related activities. Thus, they are appropriate uses.

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6-20 I must respect the history of land use on the site and the Master Plan, whether or not I agree with it.

Comment noted.
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6-21 The Corps Master Plan is not consistent with the County's Land Use Plan or the North Corridor Plan.

The 1998 Johnson County Land Use Plan states on page 3 that 'State and federal lands in Johnson County are exempt from county zoning.' The land use designations and historic use of the Camp Daybreak site predate the County's 1998 Land Use Plan and the 1996 North Corridor Land Use Plan.

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7 Alternatives

7-2 Feelings have surfaced which include a negative image and lack of confidence in the Corps.

Planning for Corps project lands is based on national and regional needs and objectives, in addition to local needs. The concerns of the local communities and individuals are important and will be considered in the decision making process for the proposed lease of the former Camp Daybreak site. The Corps is obligated to implement projects on Corps' managed lands that benefit all segments of the public.

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7-6 According to the EA, on page 1 it says the "Corps administrative policy requires that land use decisions should: provide the best possible combination of responses to regional needs, resource capabilities and suitability, and expressed public interests and desires consistent with authorized project purposes." The county fails to see where that is being achieved, especially with regards to resource capabilities of the County.

Recreational land use decisions should be responsive and compliant with Corps policy. Corps policy encourages the maximization of public use on federal lands where such use meets regional needs to a level sustainable within the environmental context and manageable within manpower and budgeting limitations. Appropriate development of a suitable site by non-Corps entities increases the recreational opportunities available to the general public at minimum federal expense. A youth camp at Coralville Lake serves a need and broadens the type of recreational and education experiences available within the region and provided at the project. The County receives economic benefits from the Corps project in several ways: payment in lieu of taxes, percentage of income from various types of leases, law enforcement contract, increase in property values, employment opportunities, local recreation, and tourism.

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7-10 Public property should not be restricted to private use.

The leasing of this site as a nonprofit group recreation area is not considered private use. The lease provides that the lessee is to make the site available to other nonprofit groups when not scheduled for use by the lessee organization. This will provide a higher level of recreational use than the site provides in its current state and the overall opportunities for recreational use is increased by providing an area that is developed and managed for organized group recreation activities. This site will serve another segment of the recreating public.

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- 7-13 The U.S. Corps of Engineers Regulatory Program Goals include (as one of three goals): "To provide strong protection of the Nation's aquatic environment, including wetlands." How does this proposal further that goal?**

Wetlands on the Camp Daybreak site were identified by a Corps Regulatory wetland biologist. Only one forested wetland area would be impacted by the proposed plan. Shifting the trail and relocating one tent platform will avoid impacts to this wetland. The proposed beach construction will impact 0.2 acres of deep-water wetland, however, no significant impact to aquatic resources is anticipated. The proposed beach would require a Department of the Army permit under Section 404 of the Clean Water Act prior to construction.

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- 7-17 The permanent closure of this resource to a private, religious group violates the Establishment Clause. MYCA has clearly stated that they will not be able to allow public access to the site.**

The proposal does not violate the First Amendment's Establishment Clause. While MYCA's founders are associated with a particular religion, its purposes and activities at Coralville will be secular in nature. By its very nature, a lease allows a lessee certain rights to exclude the use of the property by others. MYCA will not, however, be able to restrict use or discriminate on the basis of religion. Please refer to comments 2-5, 3-3, 3-10, and 7-10 for more regarding public access.

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8 Alternatives

- 8-2 Who would be responsible for minimizing erosion from parking lot, roof, and village runoff?**

The lessee of the site will be responsible for obtaining a National Pollutant Discharge Elimination System (NPDES) permit through the Iowa Department of Natural Resources (IDNR). The NPDES permit outlines procedures to be used on site during construction to control erosion and stormwater runoff. The permit requires preparation of a stormwater pollution prevention plan. The plan will identify areas which have a high potential for significant soil erosion and identify measures to limit erosion.

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- 8-3 It seems that no impacts to the geology of the site would occur.**

As stated in the Environmental Assessment, minor impacts are expected to occur during site development, but no lasting impacts to geology are anticipated.

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- 8-4 I did not necessarily agree with the findings regarding impacts to soils. I feel that construction of roads, parking areas, buildings, and other infrastructure will probably create "significant" erosion potentials. With high erosion potentials come high potential for offsite delivery of sediment to Coralville Lake. The report statement that erosion will be controlled I suspect that what was meant was "sediment will be controlled."**

Erosion controls will be implemented on-site by the lessee to limit the potential for sediment run-off into Coralville Lake as well as throughout the 106-acre tract and adjoining properties. Please see responses to comments 8-2 and 8-3.

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- 8-5 Erosion can be reduced and sediment delivery controlled by the preparation of an Erosion and Sediment control plan. This plan should be developed, implemented and maintained through the construction period. The goal should be zero discharge of sediment.**

The EA states that best management practices be utilized during construction including silt fences, construction planning, straw bales, and revegetation. Please see response to comment 8-2.

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- 8-6 As of March 2003 a NPDES permit will be required from the Iowa Department of Natural Resources.**

Please see response to comment 8-2.

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- 8-7 The soils of this site have great potential to store and allow infiltration of rainfall. Because of these potential benefits, I find it of critical importance to protect and enhance soil resources on this or any development.**

Please see response to comment 8-2.

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- 8-8 Measures to protect and enhance soil include: protect from compaction, enhance soil to increase infiltration, and ensure healthy community of native vegetation.**

Best management practices according to the IDNR approved NPDES will be implemented by the lessee to prevent soil erosion during construction of any buildings or operation of activities on the site. Please see response to comment 8-2.

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- 8-10 This land is steeply sloped and erosion is already a problem without removing acres of trees and vegetation.**

Approximately 4% of the site is being proposed to be disturbed Alternative 1. Measures will be taken in this area to prevent erosion during construction and operation. Please see responses to comments 8-2 and 8-8.

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- 8-11 With the extent of modification planned to the site, what plans will be made for erosion control?**

Please see response to comment 8-5.

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- 8-12 Mass grading and random traffic patterns - typical of most construction sites - create significant and lasting impacts to the soil resource. I was not comfortable with terms like "localized erosion" and "minor impacts" and "no lasting impacts" for soil resources.**

Please see responses to comments 8-2, 8-8, and 8-10.

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9 Alternatives

- 9-2 The constant human presence and possible security fencing will displace wildlife into the neighborhood and roads.**

Security fencing was not included in the proposed plan submitted by MYCA. Wildlife displacement has occurred in recent years due to residential development on the peninsula. Further wildlife displacement may occur as a result of development on the site, however, only approximately 4% of the site would be developed. Most of the site will remain as forest cover, and forest habitat will be maintained.

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- 9-3 The project will result in the destruction of 400 trees and natural habitat which has a negative environmental impact. If the Corps allows the habitat to be destroyed it can never be restored.**

The preferred alternative would result in development on approximately 4% of the 106-acre tract. Development in this area would require impacting approximately 5 acres of forested land. This area would be converted from forest land to parking lots, structures, lodges, trails, beach areas, and wastewater treatment. The area proposed for development is in approximately the same area as was occupied by the Girl Scout Camp. If the lease is terminated, the lessee would be responsible for removing any improvements and restoring the lease area.

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9-7 The EA incorrectly places the location of the osprey nest and does not have the most current status information of the osprey nest near the former Camp Daybreak.

Figure 4-2 was provided for graphical representation of area features. Coordinates for osprey nest locations were obtained from Corps park rangers. The Corps has been in partnership with the IDNR since 1997 in implementing the Osprey Plan for Iowa at certain locations on Corps property including Coralville Lake. Other agencies including private wildlife centers, primarily the Macbride Raptor Project, private citizens and organizations, and the U.S. Fish and Wildlife Service are also partnering with IDNR to implement this plan.

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9-9 The EA fails to indicate whether any avian surveys have been completed on the site.

Avian surveys were not completed on site as part of the EA analysis. Existing research and publications, correspondence with natural resources agencies, and a field review were used to determine impacts to terrestrial resources. Specific information relating to osprey nest locations and the ongoing Osprey Plan for Iowa was considered in the analysis.

NGO1

9-10 Construction, use of the site by campers, and creation of trails will fragment habitat that is used by neotropical migrants.

As stated in the EA, because the amount of woodland that would be converted is very small (with regard to the project site and Coralville Lake area), and is generally confined to an area of the site which has been previously disturbed, no significant impacts to migratory birds are expected to occur with any project alternative.

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9-12 The EA lists of species does not include a rare trillium that occurs on site. In addition, the EA lists pawpaw as occurring on site, which is considered rare in this part of Iowa. These two observations indicate a more detailed study is needed on site.

Please see response to comment 9-26.

NGO1

9-13 Has the Iowa Department of Natural Resources been contacted with regard to rare plants being found within 5 miles of the site? Have permits for the project been requested from the IDNR?

The IDNR was contacted regarding threatened and endangered species that could be affected by the project. They notified Zambrana Engineering that they had no records of rare species or significant natural communities at the site. They suggested that the EA address muskroot, running pine, crowfoot, clubmoss, and showy lady's slipper since the site had not been cultivated and these rare plants have been found within a five-mile radius of the site.

Any required permits from the IDNR will be requested after final design and prior to development.

NGO1

9-18 Land disturbance during construction creates a possible location for invasive species and noxious weeds. Who will manage the property with respect to invasive weed and tree species?

The lessee of the site will have responsibility to manage the site in regard to invasive or noxious plants.

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9-19 Techniques that minimize disturbance to the tree root system should be implemented during construction.

Best management practices to preserve remaining trees on site during construction would be included in the lease Development and Management Plan approved by the Corps.

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- 9-20 If mitigation measures require the replacement of every removed tree with high quality native hardwoods, and if part of the mission of the camp is teaching environmental stewardship, the benefits could offset the losses in the long term.**

Comment noted. MYCA has stated that all appropriate trees, impacted by the proposed development, will be relocated when and where possible.

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- 9-21 The impact of tree removal on bird and mammal populations on this small site, which was previously disturbed, appears to be of minimal consequence.**

Comment noted. Please see responses to comments 9-3 and 9-10.

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- 9-23 The site is currently in need of restoration based management.**

Please see response to comment 32-3.

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- 9-24 The site would be enhanced with green development and restoration based management.**

Please see response to comment 32-3.

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- 9-26 Comments from previous letters concerning issues over plants were not noted in the EA**

The public comments received during the public scoping were categorized by general issues. Those that were to be addressed in the EA were listed as such in the Content Analysis Report Summary. See response to comment 29-7.

The possibility of threatened and endangered species was addressed in Section 4.2.5 and tables were presented showing State and Federal species and species of special concern that could occur in the area including the cerulean warbler, Indiana bat, bald eagle, and several other plant species. The IDNR responded that there would be no impacts to threatened or endangered species if areas, where protected plants may exist, are not affected by construction or visitor use. However, a site investigation for threatened and endangered species would be conducted after final design is completed, but prior to construction.

NGO1

10 Purpose and Need

- 10-1 Impacts to aquatic ecology will be significant without green development. Improper storm water management is a significant impact on any development site.**

The lessee will be responsible for obtaining a NPDES permit from IDNR for stormwater discharge and erosion control. Please see response to comment 8-2. Techniques to properly manage stormwater that minimize impacts to the surrounding land and aquatic resources will be included in a stormwater pollution prevention plan to be approved as part of the NPDES.

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- 10-3 I have no substantial concerns with the proposed lease and its effects on aquatic ecology, or threatened and endangered species. Both criteria should remain mostly unaffected other than destruction of shoreline habitat. I don't think that the fishery will be negatively impacted to a major extent.**

Comment noted.

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11 Purpose and Need

- 11-1 If alternate siting of facilities could protect disturbed wetlands, it should be encouraged. Mitigation of wetland disturbance elsewhere may be a viable alternative on the lease.**

Based on the preliminary proposed site plan, the EA states that Alternative 1 would impact one tenth of an acre of wetland, but that impacts could be avoided by shifting the trail and relocating a tent platform. Arrangements to avoid this wetland impact could be part of final lease negotiations. Please see response to comment 7-13.

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- 11-2 Wetland area would benefit from the restoration of an infiltration-based, groundwater-driven hydrology on the site.**

Comment noted.
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12 Alternatives

- 12-2 The EA notes the presence of suitable habitat for many species (bald eagle, broadwing hawk, Cerulean warbler, showy ladies slipper, running pine, etc.), but no reference is made to the means used to identify and avoid these habitats.**

Suitable habitat for endangered species was evaluated using information from the U.S. Fish and Wildlife Service (USFWS) and other published literature on species that could potentially occur in the project area. A comparison was then made based on the species preferred habitat and the habitat at the project site. Sightings of the species in the general area were also considered during this process. If the two habitats were compatible, an evaluation was made to determine if the loss of this habitat was significant in terms of the uniqueness of the habitat and the size of the impact. The USFWS (comment 31-16) has concurred with the finding that no federally threatened and endangered species will be negatively impacted by any of the alternatives. The Iowa Department of Natural Resources has recommended a survey for running pine, a state-listed endangered species, be conducted within areas of suitable habitat to be impacted by construction or use. This survey will be completed during the final site development planning stage.

NGO1

- 12-3 The Cerulean Warbler is currently under review for listing and the Corps has a responsibility to protect its nest.**

The cerulean warbler has been sighted in selected areas around Coralville Lake, but no records were found indicating that the species occurred at the former Camp Daybreak site. There is a potential that the species could be located within the area, but it was the determination of biologists at Zambrana Engineering and the USFWS (comment 31-16) that a project of this scope and size will not have a significant impact on this species.

NGO1

- 12-4 Several threatened and endangered species are mentioned in the report (e.g. ornate box turtle), but no determination is made to suitable habitat or to surveys efforts conducted on site.**

Threatened and endangered species included in Tables 4-6 and 4-8 have been known to occur in the general area of the Coralville Reservoir. The habitat for these species does not exist on the proposed lease site.

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- 12-5 It does appear that the eastern prairie fringed orchid, showy lady's slipper, muskroot, and crowfoot clubmoss do not occur in the area to be developed.**

Comment noted.
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- 12-6 Suitable habitat is listed for the running pine and surveys should be conducted within this suitable habitat prior to construction.**

While the general habitat characteristics for the running pine exist on the property no evidence has been found of the species' presence on the site. At the current time the exact location and placement of structures at the former Camp Daybreak site is not known, but it is anticipated that even if running pine is present on the site, the facilities and associated activities can be arranged in such a way as to eliminate impacts to this species. The Corps plans to coordinate with the IDNR regarding investigations of this species and may provide personnel for an on-site survey prior to construction of any facilities.

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- 12-7 The Indiana Bat may occur in the project area. If trees greater than 9 inches are to be cleared between April 1 and September 30 then habitat within the construction zone may need to be surveyed prior to construction.**

Care will be taken to minimize impacts to Indiana bats during any construction. The Corps is responsible for ensuring that tree removal occur during the period when bats are using their winter roosts and conducting a site survey to identify potential roost trees present in the construction area.

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- 12-8 If protected species exist on the property but in areas not impacted by construction or visitor use, then the IDNR would have no concerns with the project.**

Comment noted. The EA concluded that there would be no significant impact from the project to threatened or endangered species or their associated habitat. The U.S. Fish and Wildlife Service has concurred with this finding (see comment 31-16).

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13 Alternatives

- 13-2 Operation and maintenance of a wastewater treatment system at the site is a major concern.**

Operation and maintenance of a wastewater treatment facility at this site will require review and approval from the Iowa DNR. Only wastewater treatment facilities that meet state wastewater treatment and discharge standards will be allowed at this site. Please see response to 13-23.

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- 13-6 The location of wells in the EA is inaccurate and one or more well locations are missing.**

The wells shown on Figure 4-2 are in their approximate location. The well located north of the subject site is intended to show the approximate location of the community well. The location shown on the exhibit is appropriate given the detail of the map. Private wells not shown on this exhibit do not influence the analysis contained in the EA. Figure 4-2 is only a representation of the well locations. All wells were included for the analysis of impacts.

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- 13-7 Siltation and sedimentation should not be characterized as "localized." Any sedimentation adds negative impacts to the whole. Only through development that adds no negative environmental impacts on every site development, will water quality and flooding concerns be addressed.**

Short term impacts associated with the construction phase are considered to be localized, in that the location of the impact is anticipated to be on-site, or immediately adjacent the site within Coralville Lake. Best management practices are intended to minimize these impacts. Please see responses to comments 8-2 and 30-7.

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13-8 The water treatment facility for Iowa City and the University of Iowa is potentially affected by the siltation and sedimentation on this site.

Best management practices will be employed to minimize siltation during construction. Appropriate detention structures will prevent appreciable impact to Coralville Lake during the operational phase of the project. These measures will minimize potential impact to the Lake overall, or to water treatment facilities in specific.

G5
GP75

13-9 Wellhead protection measures should be considered.

The proposed use of the well conforms to current regulatory standards. Additional wellhead protection measures would be considered during lease negotiations, if appropriate. Only wastewater treatment facilities that meet IDNR treatment and discharge standards will be allowed on this site.

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13-17 Even with a variance, it is still almost impossible to locate a sewage treatment system, but the EA misrepresented the dimensions and the steep slopes of the site.

Figure 4-1, Soils of Project Area, illustrates the soil type and the slopes on the project site. The exhibit utilizes data obtained from the NRCS, is drawn to scale, and uses an aerial photo as a background. Additional topographic data from the USGS was utilized to determine potential locations for a potential treatment facility.

C1
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GP53

13-20 Johnson County Planning and Zoning staff feel its is not prudent to plan a development presuming that a variance will be granted. The variance should be applied for and granted before moving to the building phase.

The EA indicates that a variance will be required. This variance will be required prior to obtaining building permits. Please see response to comment 3-14.

G5

13-22 If private wells or private onsite water systems are used, the Johnson County Board of Health Regulations would need to be met.

Comment noted.

G5

13-23 The IDNR guidelines for siting treatment facilities are strict and have been strictly enforced for the protection of the public. The variance is directly at odds with the IDNR regulations. If the proposed project was in harmony with environmental regulations of IDNR, a variance would not be needed.

The provision for requesting a variance is an authorized procedure contained in the Chapter 64: Wastewater Construction and Operation Permits of the Iowa Administrative Code. Upon submittal of a variance request, IDNR will determine whether the requested variance is in compliance with these regulations. Only wastewater treatment facilities that meet IDNR treatment and discharge standards will be allowed on this site.

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13-26 Negative impacts from impervious surfaces will impact groundwater recharge and resources.

Please see response to comment 8-2.

G5
GP75

14 Alternatives

- 14-2 I concur with the finding of "no impact" for floodplains; all proposed development is above the floodplain.**

Comment noted.

G5
GP75

16 Lease

- 16-3 The MYCA proposal is incompatible with the Johnson County comprehensive planning document and current zoning.**

As indicated on page 3 of the Johnson County Land Use Plan, State and Federal lands in Johnson County are exempt from county zoning. While the property is exempt from County zoning the proposed use can be considered a recreational use, which is a permitted use within the A3-Flood Plain District. This is a use that is consistent with the land use designation within the Coralville Lake Master Plan, originally approved in 1977. The County's subsequent zoning of land adjacent to the site as RS-Suburban District is considered compatible with this original land use designation for the subject site.

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- 16-8 Proposed development does not conform to Johnson County Road Performance Standards.**

The Johnson County Road Performance Standards are applicable to rezonings and new subdivisions. Because the proposed development does not entail a rezoning or a new subdivision the standards are not applicable. Under the standards the proposed development is considered an existing subdivision, and traffic generated by the proposed facility should be utilized to determine traffic thresholds for rezonings or new subdivisions that may occur in the area.

G5
GP60

17 Purpose and Need

- 17-1 This is a controversial project that could result in negative impacts to community cohesion which could ultimately affect community and regional growth. This area deserves more attention.**

The proposed project does not physically split a neighborhood, isolate a neighborhood, generate any significant new development, or change property values. These items are considered when assessing whether community cohesion is affected, and because no changes in these items are anticipated, it is reasonable to conclude that community cohesion will not be significantly affected.

G5
GP15
GP75

19 Alternatives

- 19-2 The project will cause increases in property taxes.**

By definition the outgrant area is to be used by nonprofit groups. Any development of the site that occurs in accordance with the Master Plan should be eligible to apply for tax exempt status. Public services to the site would continue to be provided in the same manner that they have been provided since the acquisition of the property by the Federal government. Due to the fact that public services are funded through taxes levied upon all taxable properties within the applicable taxing district, and because the project site comprises only a fraction of the land area within any of the affected tax districts, it is unlikely that the project will result in a significant tax increase.

GP9
GP31
GP65

20 Purpose and Need

20-1 The MYCA facility will cause a potential tax burden using public services without paying taxes.

Please see response to comment 19-2.

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20-2 Who will be responsible for: road maintenance/improvement of 200th Street and Scales Bend Road? Fire protection? Emergency Services? Parking? Are these increased services covered in the Environmental Assessment? If not, why not?

Johnson County is responsible for the roads and emergency services; North Liberty has responsibility for fire protection. The Corps has an existing contract for law enforcement with the Johnson County Sheriff's office. Parking will be the responsibility of the lessee. Section 5.4.10 Traffic and Parking addresses issues related to traffic on adjacent streets and on-site parking. Section 5.4.9 addresses life, health and safety issues.

GP44

20-5 The project has the potential of placing a significant burden on the road, infrastructure and fire fighting capabilities of the City of North Liberty.

Please see response to comment 20-2 and 21-1.

G2
G4
GP64

21 Purpose and Need

21-1 Increased safety problems must be addressed with Johnson County and the City of North Liberty.

Comment noted. Alternative 1, the highest use alternative, would add approximately 136 people per day to the area during the summer camping season. The area currently includes approximately 10,000 people. The addition of approximately 1% of the area's current service population would not impact any services. The EA and lease processes will continue to be coordinated with the local area governments.

GP40

21-4 Intensity of preferred alternative creates demands for fire protection, ambulance service, law enforcement, and water rescue services beyond the level that can be provided by the County and North Liberty.

Please see response to comment 20-2 and 21-1. The Johnson County Emergency Ambulance Service has reviewed the EA and finds no significant increase in or impact to ambulance service for the area. All new construction must meet local building codes, which include provisions for fire safety and protection. Law enforcement, including water rescue services, is currently provided by the Johnson County sheriff's office. The Corps currently has a contract with this office to provide law enforcement and rescue services for federal land at Coralville Lake.

G2
G5

21-6 Added demand to fire, police, and emergency personnel creates safety issues.

Please see response to comment 20-2 and 21-1. Johnson County is responsible for issuing a building permit to the lessee. Fire protection, such as sprinklers and an adequate water supply to fight fires, will be addressed through this permitting process.

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21-7 Existing roads are not wide enough and have too much overgrowth to allow fire trucks to enter the facility.

As indicated in Section 3.1.3, Site Improvements, the existing access road will be improved to provide all weather access to the site and allow adequate access for emergency vehicles.

G2
G5

21-8 The convention center will need a sprinkler system and must comply with United Building Codes.

A convention center is not included in the site improvements proposed for any of the alternatives. All structures, including the lodge, will comply with local building and fire codes. The current design capacity of the lodge is 200 people; with no overnight facilities. Final design plans for the site improvements will be submitted to local permitting agencies for review and issuance of building permits.

G2
G5

21-9 Based on a structure 107 x 70 x 30 water needs are 2,247 gallons a minute for four hours. This will require all the water trucks from the entire county.

Comment noted. The EA addresses the potential need for a non-potable water supply for fire fighting needs. When the building designs have been finalized, an accurate estimate for water demand for fire fighting needs can be established. See response to comment 21-8.

G2
G5

21-10 Weather conditions could provide additional delays to fire fighting activities at the camp due to the steep elevation of the access road into the camp.

Scales Bend Road is an existing county road, and no improvements to the road are proposed in the MYCA lease application. Please see response to comment 21-7.

G2
G5

21-11 A dry hydrant will not work at the facility.

Detailed design of site improvements has not been completed. Final designs will be submitted to applicable agencies/departments for review and issuance of permits prior to construction. Any new construction will be required to meet building codes.

G2
G5

21-12 Tent and cabin areas are difficult to access with hose lines. Widening trails might make this easier.

Comment noted. See response to 21-8.

G2
G5

21-13 Who will have jurisdiction over building codes and other safety issues?

State and local permitting authorities have jurisdiction over building codes and safety issues.

G2
G5

21-14 The fire department should be compensated for coverage of a commercial building.

None of the alternatives evaluated propose the construction commercial buildings.

G2
G5

21-15 Storm shelters need to be addressed for the safety of the people.

Comment noted. This issue should be addressed during lease negotiations.

G2
G5

21-16 Who is responsible for evacuating people from the site that do not have cars?

The camp director and the camp counselors would be responsible for the care of the campers and preparation of emergency plans.

G2
G5

21-17 How will the presence of buses affect the ability to get firefighting equipment into the site and set up?

Buses would be parked in a location that does not interfere with overall on-site traffic circulation.

G2
G5

21-19 Not enough information in EA to enable the Johnson County sheriff to estimate the effects of the proposed use on the sheriff departments contract with the Corps.

More detailed information would be provided to the Johnson County Sheriff's office during lease negotiations.

G5

21-20 Proposal will not negatively impact the ability of Johnson County Ambulance Service to provide service to the area.

Comment noted.

G5

21-21 Weather sirens, maybe weather radios, and shelters are needed during inclement weather conditions.

Comment noted. These issues should be addressed during the lease negotiations.

G5

21-22 MYCA Food service facilities must meet the requirements of the Iowa Food Code.

Comment noted. Approved uses will comply with applicable codes.

G5

21-23 If abandoned wells are located on the site, they must be properly plugged in conformance with Johnson County Board of Health Regulation Governing Non-Public Water Supply Wells 49.15.

Comment noted. Approved uses will comply with applicable codes.

G5

21-24 If a pool or spa facilities are planned in the future, Johnson County Public Health should be contacted as the delegated regulatory authority by the Iowa Department of Public Health for the swimming pool and spa rules.

Comment noted. Approved uses will comply with applicable codes, however no pools or spas are proposed under any of the alternatives.

G5

21-25 Winter use, fire can be a problem. Will building be sprinklered, have smoke detectors, have extinguishers? Are trained personnel on site to insure proper operation of these life safety devices?

New construction will meet fire and building codes. Camp personnel will be trained appropriately.

G5

21-26 Will MYCA contract for fire protection?

The lease proposal submitted by MYCA does not include any reference to contracting for fire protection. Fire protection for federal lands in the area is currently provided by the North Liberty fire department.

G5

21-27 Will hazardous materials be onsite, and if so will there be personnel to handle these products?

On-site storage of hazardous materials is not included in any of the alternatives considered.

G5

22 Alternatives

22-2 Increased traffic is a concern.

Section 5.4.10 Traffic and Parking provides an analysis of traffic and roadway capacity. The analysis indicates that Alternative 1 would add less than seven (6.21) vehicles during the a.m. peak hour period, and would have no appreciable impact on the local road system. Seven vehicles an hour during the peak hour is a negligible increase and will not result in a significant impact to current traffic.

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GP2

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GP68

GP74

GP90

22-3 The county road needs work to handle the traffic

Please see response to comment 22-2.

G5

GP2

GP11

GP41

22-5 Increased traffic problems must be addressed with Johnson County and the City of North Liberty.

Please see response to comment 22-2.

G2

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22-6 Traffic numbers from Zambrana Engineering, Inc. and the MYCA proposal are unrealistic given the size of the facility. The impact on the area has been based on unrealistic predictions of traffic and unspecified plans for off-site parking areas.

Traffic analysis contained in the EA is based on existing traffic counts obtained from IDOT, traffic generation rates prepared by the Institute of Traffic Engineers, and capacity levels published by the Transportation Research Board. These sources, in combination with traffic projections contained in the MYCA lease application, which are based on their operational scenario, were used to develop the analysis in the EA.

Traffic generation is stated as ADT which means average daily traffic. This recognizes that on some days traffic will be higher than average. This will occur during days when campers are picked-up or dropped off. As indicated in MYCA's proposal, pick-up and drop-off activities would occur during nonpeak hours. As indicated in the EA, this increase in traffic would not impact roadway capacity.

Please see response to comments 22-16 and 22-21.

GP20
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GP68

- 22-7 There are alternatives and compromises that could be reached to address any valid concerns that might exist for roadways and emergency services.**

Comment noted.

G5
GP75

- 22-8 The County raises valid concerns over traffic and emergency responses. It seems likely that the Corps could proceed with this plan. Additional traffic generated by this development and by future development in the area makes it logical for the County to consider upgrading roads.**

Comment noted.

G5
GP75

- 22-9 Due to the concern over the adequacy of parking spaces, on-site and off-site parking and a shuttle system would be required.**

As indicated in Section 5.4.10 of the EA, adequate on-site parking is provided for the camp operations associated with Alternative 1. If additional offsite parking for noncamp activities is required, the lease applicant will be required to provide such parking. If the lease applicant is unable to provide offsite parking, the usage of on-site facilities would have to be limited to a level supported by on-site parking facilities.

G5
GP75

- 22-11 The MYCA plan does not provide for adequate parking especially for a facility that can accommodate 200 people for special events.**

Please see response to comment 22-9.

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- 22-13 Traffic data from 1998 or 2000 is outdated and the report needs to consider the increased traffic from an increase in development in the area.**

The traffic analysis included Level of Service (LOS) based on assumed new development, including an additional 115 residences. Data from 1998 and 2000 is not considered outdated for a traffic analysis of this type. Additionally, the analysis included traffic that would be generated from residences on 115 platted lots on existing, yet undeveloped lots.

G2
GP41
GP96

- 22-16 The counts used for traffic and parking are seriously flawed.**

Please see response to comment 22-6. Traffic rates were determined from the MYCA proposal as submitted and ITE standard traffic generation rates. The operational scenarios presented by the commenter do not reflect the operational plan for the Camp presented by MYCA, and were therefore not part of the evaluation contained in the EA.

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GP19
GP47

- 22-18 The preferred alternative would entail considerable cost for road construction and improvements not currently included in the County's five year plan.**

Please see response to comment 22-2 regarding projected increases in traffic.

G5

- 22-19 Accident data presented in the EA is insufficient to justify the statement that "it is extremely unlikely that the small amount of additional traffic associated with the alternatives could materially impact the overall rate."**

The EA states that no evaluation of the accident rate has been conducted, due to the fact that no accidents have been recorded in recent years at the 200th Street NE/Scales Bend intersection. The determination that it is unlikely that the small amount of additional traffic associated with the alternatives could significantly impact the overall accident rate on Scales Bend Road or the intersection was made based on observations of traffic characteristics along Scales Bend Road, speeds on the road as observed by Johnson County, the absence of any reported accidents in recent years, and the trip generation for each of the alternatives.

G5

GP33

- 22-20 There are no plans in place at this time for improvements to Scales Bend Road NE or for 200th St NE, or the intersection of Scales Bend Road NE and 200th St NE.**

Comment noted. Please see response to comment 22-2 regarding projected increases in traffic.

G5

- 22-21 While the MYCA proposal is stated to generate 50 vehicle trips per day, it is not unreasonable to estimate an average daily trip generation of 200-300 trips per day. Using higher trip generation numbers of 200-300 trips per day does not impact the capacity of 200th St. NE or Scales Bend Road.**

A daily trip generation of 200-300 trips is not consistent with the proposed activities at the camp. An independent traffic analysis concluded that the total amount of traffic from any of the alternatives evaluated in the Environmental Assessment would not create a significant change or impact to the existing roadway systems.

G5

- 22-22 The project will require significantly more parking than is currently provided on site. No one from MYCA has approached North Liberty with plans for an off-site parking lot which may not be permitted under the zoning regulations.**

Please see response to comment 22-9.

G2

- 22-24 The issue with the adequacy of Scales Bend Road exists, incidental of the MYCA proposal. Any redevelopment of the property that increases traffic will exacerbate the road surface adequacy issue.**

Comment noted. No significant change or impact to the existing roadway systems is anticipated from any of the alternatives evaluated in the EA.

G5

23 Purpose and Need

- 23-1 The EA downplays the impact of the change in the visual impact that the retreat/conference center will have on the landscape. There is currently no development visible at this location from the reservoir.**

In section 5.4, the EA addresses the visual change from the reservoir as a result of development on the shore. As other areas along the lake have been developed with residential and recreation related facilities, views from various parts of the lake include structures. Analysis in the EA concluded that the buildings proposed under Alternative 1 would not constitute a significant visual impact. Development would include minimal loss of trees to preserve the rustic setting and use of architectural and landscaping design to reduce aesthetic impacts consistent with other development around the lake.

GP47

GP61

23-2 The layout of the facility cannot be accomplished in such a manner that privacy is assured to surrounding neighbors.

As stated in Section 5.4.11 of the EA, site design of structures proposed in Alternative 1 would be developed approximately 400 feet from the north property line and adjacent neighborhood and at an elevation approximately 20 to 70 feet below the ridgeline. This location will reduce visibility of the facility from the adjacent residences. Forested areas would remain between the facilities and the adjacent neighborhood.

GP68

23-3 The proposed location keeps the development at a low enough elevation to avoid negative impacts to the viewshed of the residential sites to the north. During the growing season, leafed out trees would alleviate concerns about the viewshed.

Comment noted. Please see response to comment 23-2.

G5

GP75

23-4 I appreciate the attempt to mitigate aesthetic impacts to the viewshed, but I think people will find what they see from the lake and perhaps from residential areas to be significant.

Comment noted. Please see response to comment 23-1.

G5

GP75

23-5 I think there would be significant visual changes with this development, but I don't think they would have to be negative. In fact, people boating on the Lake might find the alternative they see to be educational and aesthetically pleasing.

Comment noted.

G5

GP75

23-6 Light from the proposed facility will be visible to adjacent landowners.

The proposed facility in alternative 1 would be constructed below the ridge line located on the north side of the property. See response to comment 23-2. This location minimizes light from the facility. Existing vegetation within a 400-foot buffer between residences and the proposed facilities also minimizes light from the facilities to adjacent properties.

C1

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25 Lease

25-3 Why weren't existing facilities in the area considered for noise evaluation?

Noise levels generated by camping activities were assumed to be 55 dBA, a typical noise level at intermediately populated lake beaches (Komanoff and Shaw). It was assumed that this level was an appropriate noise level for the proposed camp area as no similar developments exist in the area.

GP27

25-4 Will the facility use loudspeakers to communicate with campers?

Specific operational issues associated with the proposed camp would be discussed during preliminary and final design and approved by the Corps through a lease. At this time, the MYCA proposal does not mention the use of loud speakers.

GP98

25-7 The effect of noise from 150-200 campers 300 feet from private homes was not addressed.

The maximum number of campers for this site would be 120, plus 16 staff. The level of 55 dBA was used as an input to the noise model representing the typical noise level at a camp. As stated in the EA, the model considers factors such as distance from the proposed activity to receptors, terrain, and features such as tree cover. With the 55 dBA input and these factors, the noise model indicated that, with implementation of the MYCA proposal, noise levels at the 5 receptors would be between 23.5 dBA and 38.1 dBA.

C1

GP44

GP47

GP61

25-9 Noise issues such as amplified sounds, calls to prayer, and bells were not addressed.

Please see responses to comments 25-3 and 25-4.

C1

GP19

25-10 There will be increased noise with the project, however it may not be significant.

Comment noted.

G5

GP75

26 Purpose and Need

26-1 I trust this finding (no impact). It sounds like the site has been well studied and documented.

Comment noted.

G5

GP75

26-3 More detailed information on the archeological sites identified on the site is needed in order to evaluate the finding of no significant impact. Who made the determination that the sites were not eligible? What were the cultural resources within the Area of Potential Effect (APE). State Historic Preservation Office (SHPO) concurrence was only by lack of response.

Disagree. There is sufficient information provided in Section 4.7 of the EA that includes summary information about past surveys, recorded archeological sites, investigation techniques, cultural affiliation of the archeological sites, and the types of sites documented in the area of potential effect. The Corps, as the lead federal agency, made the determination that the sites were not eligible for inclusion on the National Register of Historic Places (NRHP) and sought comment from the State Historical Society of Iowa (SHSI), relevant federally recognized tribes, and other interested members of the public by letter dated October 12, 2000. No comments on the Corps determination were received. Pursuant to 36CFR800.3(c)4, a federal agency may proceed with an undertaking if comment is not received within thirty (30) days of the date of the consultation letter. The SHSI formally identified that date as November 16, 2000 and acknowledged their lack of response with a stamped concurrence dated November 20, 2000. Further, the SHSI concurred with the Corps findings as presented in the Environmental Assessment by letter dated December 6, 2002.

G9

26-4 The State Historical Society of Iowa stated that the information on cultural resources provided in the EA is accurate and that they concur with the finding of No Significant Impact.

Comment noted.

G1

27 Purpose and Need

27-1 I trust the finding of no significant impact for solid/special waste.

Comment noted.

G5

GP75

28 Purpose and Need

28-1 I concur with the finding of no significant impact to manmade resources.

Comment noted.

G5

GP75

29 Purpose and Need

- 29-1 The timing of the release of the Environmental Assessment over the holiday season was problematic. Forty-five days for public review was not given because copies of the EA were received several days into the comment period.**

The standard length for the public review and comment period for any Environmental Assessment is 30 days. The comment period for this EA was increased to 45 days, in part due to the holidays.

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C1
C2
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GP98

- 29-2 Zambrana Engineering did not adequately assess the extent of public opposition in the environmental assessment.**

The purpose of the EA is to assess potential environmental impacts as a result of the proposed project, including impacts to the social environment. The EA process includes public involvement which is designed to gather citizen input. The EA includes a Content Analysis Report which documents this input and public comments made regarding the proposed project. All letters received during the public comment period for this EA will be considered in the final decision.

P1

- 29-5 I object to the previous Content Analysis Summary as comments were reinterpreted and summarized to minimize concerns.**

Comments received at the public scoping meeting and immediately following were categorized by topic in the Content Analysis Report (CAR), a summary of which is included in the EA. Categories were coded for analytical purposes. Comments were noted for each comment category indicating whether it was an issue for inclusion in the EA, if it needed to be addressed at the lease agreement stage, or if it was not an issue that either the EA or lease could address. Fifty-one percent of the comments received were addressed in the EA as shown in the index provided in the CAR Summary. The remaining comments are lease issues or not applicable to the EA/FONSI decision.

NGO1

- 29-7 We were lead to believe that all concerns would be addressed. Many specific issues of concern that were submitted during the scoping meeting were not addressed.**

Please see response to comment 29-5. All comments received during the public review and comment period will be addressed in this document.

GP44
GP67
GP71

30 Purpose and Need

- 30-1 The proposed project will cause degradation of natural resources and the environment, increased traffic on the area roads, require extra police and fire protection, and invade the rural lifestyle of the area. It should not be approved at this location.**

The EA was conducted to assess the project alternatives in terms of potential impacts to the environment. Twenty-four environmental impact categories were examined, by project alternative, including natural resources, health and safety, and the social environment. The EA concluded that, in each category, no significant impact would occur to the environment for any of the alternatives. In addition, the proposed use is consistent with the Master Plan land use designations for the site and consistent with the past use of the site.

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GP97

30-2 Project impacts to the environment are too great.

Please see response to comment 30-1.

NGO1
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GP32
GP42
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GP72
GP91
GP92
GP98

30-4 It appears that the environmental impacts of such an intensive use can be mitigated, and there may be some benefits accrued from using the property again.

Comment noted. Please see response to comment 30-1.

G5

30-5 There are valid environmental concerns with this development such as: construction site erosion, post-construction run-off, waste-water treatment, aquatic ecology, stormwater management, groundwater recharge, parking, altering soil profiles, and soil compaction. These concerns can be overcome with restoration and ecological management and green development using such techniques as: understory removal, elimination of invasive plants, fire management, reconstructed ecosystems, green building designs, green stormwater management, restoring stable hydrology, wetland wastewater treatment facilities, cistern run-off control and infiltrating traffic system.

Please see response to comment 32-3.

G5

GP75

30-7 Little mention is made in the EA of the impact of construction operations on the site and adjacent roads and properties.

It is noted in the EA that construction activities will be temporary activities. Elevated noise from construction activities may occur at the site, but would be of short duration and spread over a period of two years according to the MYCA proposal. Issues relating to erosion and stormwater management during construction would be addressed through an NPDES permit (see response to comment 8-2). Impacts to roads and adjacent properties from construction activities are not expected and were not addressed in the EA. Please see response to comment 31-18.

GP62

30-9 The location of the project has too great of impact upon the surrounding land as it will impact 5 acres of woods on a narrow strip of lake property that encompasses about a mile of shoreline on Coralville Lake.

Please see response to comment 9-3.

C1

GP87

31 Water Resources

31-13 The EPA stated that a review of the EA had found nothing of consequence or significance and therefore the EPA would not be making a formal comment.

Comment noted.

G6

31-16 USFWS - No objection

Comment noted.

G3

32 Lease

- 32-3 More work is needed on the EA to include restoration ecology and green development aspects. Impacts on all four alternatives need to be evaluated with these principles in mind.**

The EA evaluates the significance of impacts associated with each of the alternatives. Green development techniques may enhance site characteristics, however, these techniques are typically utilized in the restoration of sites and are not a requirement for the development. The Corps supports green development, and MYCA has proposed the use of green development techniques. Details of green development may be incorporated into the final lease.

G5
GP75

- 32-4 The "process" followed by the Corps does not take into account the communications of the public.**

A public scoping meeting was held at the beginning of the environmental assessment process to identify the local concerns. The Environmental Assessment was distributed to over 475 parties for review and comment. All substantive comments must be addressed prior to any decision on this project. Please see response to comment 7-2.

C2
GP3
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- 32-5 The Corps is prejudiced in favor of the MYCA proposal.**

Disagree, the Corps serves all segments of the general public. Lessee evaluations and preparation of the EA were separate processes. The EA was prepared by a neutral third party, Zambrana Engineering, Inc.

C1
GP50
GP67

33 Aquatic Resources

- 33-10 I would welcome the opportunity to interact with a more diverse culture in the Johnson County community, to learn more about a major world religion, and to use the conference center for conventions or meetings.**

Comment noted.
G5
GP75

- 33-11 Issues like increased traffic or noise levels are valid concerns that should be considered and addressed with sound planning, sensitive design, and good management of the facilities and activities in a post development state.**

The lessee would assume responsibility, under the terms of the lease, for almost all matters relating to the construction of facilities, and the operation and maintenance of the premises. A Development and Management Plan, part of the lease, would designate where improvements would be placed and explain how the facilities and premises would be managed, operated, and maintained. Issues such as sound planning, sensitive design, and good management of the facilities would be addressed in this plan.

G5
GP75

- 33-14 The MYCA project would be better off in a more secluded, less controversial site.**

The Corps Master Plan designates the former Camp Daybreak site as an area for high density recreation which is consistent with Alternative 1, a level use as represented by the MYCA proposal. It is expected that the needs of any non-profit organization that seeks to lease the site, including locational needs, the site setting, and recreational amenities available, will be met at this location. Refer also to responses to comments 2-2 and 2-3.

G5
GP67

33-16 The facility would be more appropriately located closer to an interstate/airport/large city where the services they will require can be provided.

Comment noted. Please see response to comment 33-14.

G5
GP41
GP78

33-28 The Corps is planning to build a Muslim Youth Camp of America convention center with a multi-story hotel to house hundreds of Muslim youth.

The Corps is currently considering leasing the 106 acre site. Any facilities would be financed and built by the lessee. Alternative 1, a level of use which is represented by the MYCA proposal, includes tent pads and cabins for campers, and a central lodge which would not provide overnight lodging. The proposal does not include a convention center nor a hotel. One hundred and twenty campers and 16 staff would be present on a daily basis during the summer camping season.

C2

33-31 Area property owners and area governmental organizations have opposed the project due to the magnitude and the vast difference from any previous usage of the area.

Comment noted. Numerous comments have been received by the Corps from the public and area governmental organizations regarding the scale of the project. Please see response to comments 2-7, 2-11, 2-18, and 6-9.

C1
GP74
GP87

33-32 Area governmental organizations believe that approval of the lease without more significant investigation and resolution of issues would be premature. These organizations believe that the proposed project will have a greater impact on the residents of North Liberty than is recognized in the EA.

The Corps has been working with government organizations to resolve issues of disagreement and will continue to do so throughout lease negotiations.

G2
G4
G5