

Appendix G: Detailed Summary of Comment

Eufaula Summary of Public Comments Scoping Process – Environmental Impact Statement

Summary

Major Issues Identified during Scoping

1. Concerns Related to the National Environmental Policy Act (NEPA) Process
2. Public Lands and Access Considerations
3. Socioeconomic Concerns
4. Fish and Wildlife Considerations
5. Water Quality Concerns
6. Visual/Scenic Considerations
7. Cumulative Effects Analysis

Major Statutory Requirements

1. Threatened and Endangered Species (Endangered Species Act)
2. Section 106 (National Historic Preservation Act of 1966) Coordination
3. Section 10 (Rivers and Harbors Act of 1899) and Section 404 (Clean Water Act) Permits
4. Americans with Disabilities Act (ADA): ADA Title III for Public Accommodations

Other Issues (to be addressed, but not likely to result in important discussion/analysis)

1. Air Quality
2. Noise
3. Handicapped accessibility
4. Mowing Regulations
5. Lake Level
6. Flood Plain Management
7. Riparian Areas
8. Migratory Birds

Major Issues Identified During Scoping

I. Concerns Related to the National Environmental Policy Act (NEPA) Process

Need for Environmental Impact Statement (EIS) and Scope

Federally-funded EIS is required for entire lake

Scope of EIS should be limited and process should be expedited

EIS should focus on lake wide impacts

EIS should address cumulative effects

EIS should address previous instances where the ultimate action that occurred went beyond what was considered in consultation and in the NEPA process

EIS should address the previous planning documents for Lake Eufaula, including the ; 1977 Master Plan; and the 1998 Shoreline Management Plan

EIS must look at the action objectively, and not as a “done deal”
EIS should form a fact-based foundation for sound future planning and lake development
EIS should be scientific in nature, be derived from intensive research, and should be peer-reviewed
Data collection in EIS should be defensible and representative of factors that may affect the data (e.g., weather, season, etc.)
EIS should be written clearly and in layman’s terms

Alternative Development

Alternatives must detail the private development included in the action
Alternatives should not address deed restrictions on land above 597 feet amsl
Alternatives should not address deed restrictions on land below 597 feet amsl that are unnecessary or otherwise tied to particular concerns that are addressed through other regulatory means (e.g., endangered species act)
Alternatives that unreasonably limit development features or shoreline uses should be rejected
No action alternative should be based on current plans for developing the adjacent private property

Mitigation Plans

Mitigation should address both fish & wildlife and recreation issues
Mitigation discussion should address the development of environmentally conscious plans, including minimization of tree and vegetation loss, reduction of erosion and sedimentation into the lake, viewshed protection, preservation of sensitive environmental resources, increased public access, and mandated community open space

II. Public Lands and Access Considerations

Loss and fragmentation of Public Lands
Existing uses of Public Lands (e.g., quasi-public leases of federal land)
Leased government land is not public and should not be considered public
Shoreline access
Public Trust Doctrine
Access to lands identified for transfer
Public/private conflicts
“Private” nature of development and exclusivity issues
Difficulty of access to Public Lands throughout reservoir
Changes in use of Public Lands over time
Access to land below floodpool and identified as easement
Public use areas within the planned development
Proportions of Public Lands available/unavailable at reservoir and in adjoining states
Nature of action as “precedent-setting”
Shoreline ruggedness as a factor in public access

III. Socioeconomic Concerns

Economic benefit (property values; tax base; increased tourism; jobs)
Economic growth stimulation
Infrastructure development (water; sewer; roads; electricity)
Traffic loading
Market analysis and competition (resorts; marinas; golf courses)
Facilities/opportunities already available; underutilized facilities
Economic effects of flood/drought conditions
Effects of development's actions on other small businesses in area
Short-term and long-term economic viability
Annual/seasonal activities and economic viability
Impacts of infrastructure development on erosion, water quality, vegetation, fish, wildlife
Population, demographics, social groups living and recreating in area
Public/private conflicts
Socioeconomic group conflicts
Effects of development on lake operations (economic/political pressure)
Effects of floodpool easement on lake operations
Previous use of project area as rock quarries; effect on developing land
Quality of improvements because of single developer
Possible conflicts with Land and Water Conservation Fund project

IV. Recreation Opportunities

Boating
Fishing
Hunting
Swimming
Hiking
Archery hunting
Birding
Primitive camping
Recreational vehicle camping
Photography
Wildlife viewing
Access to/within cove
Shoreline access
Safety (boating) and volume of users
Public/private conflicts
Public/hunting areas fragmentation and displacement
Impact of existing developments and quasi-public leases on public/hunting areas
Quality of recreation opportunities
Resorts, golf courses, and high-end recreation opportunities
New recreation facilities
Access and use of "natural" areas

Increased recreation benefits should be discussed, including public boat ramps, boat docks, public parks, open spaces, trails, and two public golf courses

V. Fish and Wildlife Issues

Ecosystem

Fish spawning and effects of dredging and bulkheading

Habitat, including “critical” habitat

Wildlife corridors

Environmental buffers

Shoreline habitat

Effects of floodpool easement on habitat

State species/habitat protective rating/state evaluation of habitat

Relationship to water quality

Habitat fragmentation

Fish and wildlife populations; effects on hunting and fishing

Previous use of project area as rock quarries

Migratory bird nesting season (1 April – 15 July)

VI. Water Quality Concerns

Data on existing conditions

Runoff expected from development

Pesticides and herbicides used for golf courses

Erosion and sedimentation; effects on water quality

Effects of vegetation removal on water quality

Effects of environmental buffers on water quality

Effects of poor water quality on fish and wildlife; vegetation

Data on increased fecal coliform bacteria, with emphasis on heavy rain events

Effects of dredging, bulkheading, and wave action on water quality

Effects of aging buried septic systems

Effluents and sources

Total daily maximum load

State water quality standards

State Clean Water Act Section 303(d) list

Effects of increased sedimentation (from development) in lake; impact on reservoir operations

VII. Visual/Scenic Considerations

Shoreline/scenic impacts

“Natural” areas

Visibility of development from water

Impact of diminished scenery on tourism (revenues, visitation)

Returning “protected status” to habitat areas classified as limited development (as mitigation)

VIII. Cumulative Effects Analysis

Loss and fragmentation of Public Lands and access to remaining Public Lands in reservoir area, and in adjoining states

Loss and fragmentation of recreation opportunities

Changes in water quality

Changes in socioeconomic conditions

Loss of visual/scenic attributes and impacts on recreation and socioeconomic conditions

Cumulative effects of outgrants, transfers, encroachments, permits, and leases

Sedimentation of reservoir (e.g., underwater surveys and mapping)

Effects on reservoir flood control, hydropower, and water supply

Cumulative effects analysis, including foreseeable actions, should not include detailed study of all projects proposed for the lake

Court cases which address the Public Trust Doctrine and relationship to this action

Appendix H: Development Proposals



August 2, 2011

Colonel Michael Teague, District Commander
Dr. Bryan Taylor, Project Manager
Mr. Jeff Knack, Lake Manager, Eufaula Lake
US ARMY CORPS OF ENGINEERS - TULSA DISTRICT
1645 South 101st E. Avenue
Tulsa, OK 74128-4609

RE: STAKEHOLDER'S COMMENTS
EUFAULA ENVIRONMENTAL IMPACT STUDY

Dear Sirs:

On behalf of the owners of Carlton Landing, I am pleased to provide you with the attached submittal. I appreciate the opportunity to convey the plans and future needs of Carlton Landing and specifically describe how those plans and needs relate to the U.S. Army Corps of Engineers (the "Corps). It is our desire that, due to the scale and complexity of the Carlton Landing project, we might work with the Corps to create a single document of understanding (be it a lease or some other form of agreement) which is acceptable to all parties. We envision that this document would describe and define the terms under which Carlton Landing might function in and around Lake Eufaula and the surround Corps lands. We hope to begin the process of working with you to create such a document as soon as practically possible.

The attached submittal will describe our specific requests to interact and utilize the lake and Corps lands in certain ways. But before getting into those specific elements (the WHAT), I think it is beneficial for you to understand the parties involved (the WHO) and of the motivation for tackling a project like Carlton Landing (the WHY). Therefore, the attached submittal is intended to provide you with a broad understanding of the Carlton Landing project and includes the following:

- Background information on the developer and personal information on the key players
- An overview of the Carlton Landing project
- An analysis of the proposed economic impact Carlton Landing plans to produce
- A summary of the design characteristics of Carlton Landing
- An overview of the sustainability measures incorporated into the design, development and operations of Carlton Landing
- An overview of 'Light Imprint New Urbanism' and how this innovative approach to stormwater management has been infused the design and construction of Carlton Landing


CARLTON LANDING

In order to communicate the specific requests, plans and future needs of Carlton Landing, I thought it best to divide the Corps lands adjacent to Carlton Landing into separate areas for the purpose of understanding the different needs we have in the different areas. For your review, a map identifying the different land areas is included as Exhibit A in the Appendix. Exhibit B in the Appendix shows a table that describes the different uses requested for the various land areas. These uses and goals represent the desired outcomes we hope to realize as a result of the EIS being completed and the Shoreline Management Plan being updated. The Appendix also includes a gallery of images of these different land uses to provide more clarification and further explanation can be provided upon request.

It should be noted that our submittal is intentionally designed to protect, preserve and promote the natural beauty of Lake Eufaula. This portion of Lake Eufaula has been a special place for our family for 40 years now and we don't want to see the shoreline be altered any more than is necessary. We currently own three quarters of a mile of shoreline currently zoned for limited development. This land is on the south side of the cove south of Roundtree Landing. We propose to swap zoning with the Corps through this updating of the Eufaula SMP so that the major boat traffic load can be redirected to the major part of the lake – from the area north of Roundtree Landing. In doing so, the natural beauty of the cove can be protected while the more intensive zoning is located at an area more fitting for boat storage, community docks or a new marina.

I appreciate the Corps of Engineers leadership and staff for your assistance with this submittal. If you have any additional questions, please feel free to contact me directly.

Best regards,



Grant Humphreys, Town Founder
Carlton Landing

CARLTON
LANDING

PUBLIC RESPONSE SUBMITTED BY

GRANT HUMPHREYS

KIRK HUMPHREYS

HUMPHREYS PARTNERS 2009 LLC

COLLECTIVELY, THE TOWN FOUNDER OF CARLTON LANDING

PRESENTED TO THE

UNITED STATES CORPS OF ENGINEERS

ENVIRONMENTAL IMPACT STUDY

EUFAULA LAKE, OKLAHOMA

AUGUST 2, 2011

ABOUT THE DEVELOPER

The Humphreys Company is a real estate development firm based in Oklahoma City. Our company has a regional reach with a property portfolio that spans the Midwest and Southeast, yet we have strong hometown roots. Although our project teams include the industry's best with sophisticated tools of progressive and sustainable construction, we cling to an appreciation for simplicity and the underlying motivations behind our every move. We believe that real estate development is a means to address the deeper, more important issues such as community formation, ecological sustainability and the strengthening of human relationships. The Humphreys family has owned property in this area of Lake Eufaula since 1968 and feels a strong connection to the lake, the land and the lifestyle offered in eastern Oklahoma.

Grant Humphreys is an Oklahoma-based real estate developer with a focus on creating urban mixed-use communities that provide social and ecological benefits in addition to a solid risk-adjusted financial return on investment.

In the fall of 2004, Grant began a focused effort to develop mixed-use projects in Oklahoma City's urban core. In the summer of 2005, the Oklahoma City Urban Renewal Authority selected Humphreys to redevelop a key parcel of land located on the outskirts of the Central Business District. This site is the location of 'Block 42', a high-end condominium project offering 42 modern urban dwellings. Block 42, which was completed in early 2008, was among the first owner-occupied housing built in downtown Oklahoma City in decades. The Block 42 project also set a new standard for sustainable design as the only LEED certified project in downtown.

Grant is a 1998 graduate of Baylor University with a Bachelor's of Business Administration in Real Estate. Grant and Jenifer Humphreys live on Lake Eufaula with their five children – Emma Grace, Ford, Jack, Mary and Hank. They attend First Baptist Church in Eufaula, Oklahoma. Grant is a private pilot and enjoys golf, backpacking, fly-fishing and travel.

Kirk Humphreys is a native of Oklahoma City and a 1972 graduate of the University of Oklahoma with a Bachelor of Business Administration in Finance. From 1972 until 1989 Kirk and his brothers built a distribution company which provided beauty products and other non-food merchandise to retailers nationwide. Since then, Kirk has been active in real estate development.

Known across Oklahoma for his public service, Kirk served on the Putnam City School Board from 1987 through 1995. He was twice elected Mayor of Oklahoma City, serving 1998 through 2003. Under Kirk's leadership, the city completed the historic MAPS Projects which dramatically revitalized the downtown area. In 2001 Kirk led the effort that resulted in the approval of MAPS for Kids, a sweeping \$690 million revitalization of the city's public schools. He is past Chairman of the Oklahoma District Council of the Urban Land Institute and serves on the board of OGE Energy Corp.

Kirk is a family man. He and Danna have been married for 39 years and have 3 children and 6 grandchildren. They live in downtown Oklahoma City and split time at their lake house on Lake Eufaula.

PROJECT OVERVIEW

Carlton Landing is a walkable resort community located on more than 1,600 acres of previously undeveloped land on the shores of Lake Eufaula. The community is designed according to the design tenets of “New Urbanism”, meaning that it is designed at a human scale to accommodate vehicular traffic while intentionally encourages walking and bicycling as the primary means of transportation within the community.

The design for Carlton Landing was created in July, 2008 during an 8-day charrette – a intensive and collaborative design process – facilitated by Duany Plater-Zyberk (“DPZ”). DPZ is an internationally recognized urban design firm specializing in mixed-use, walkable communities. The charrette team studied the natural contours and intrinsic focal points of the site, as well as the architectural legacy of the surrounding areas. Over the course of the charrette, the team developed the master plan for Carlton Landing. The resulting design is compact, mixed-use and pedestrian-friendly, with generous sidewalks and narrower, safer streets. Interior parks, plazas, and walking paths make strolls inviting; shops and recreational facilities give a purpose to walking.

Carlton Landing’s master plan includes a broad range of home choices, including cottages, townhouses and larger single-family homes. Apartments over garages in the rear of homes provide guest quarters or studios. Live-work units are suitable for those who want a modest business on the ground floor and living quarters above. All in all, the master plan provides for more than 2,300 homes and multiple neighborhood centers containing several businesses and restaurants.

Design standards for Carlton Landing are described in “A Living Tradition – The Design Code of Carlton Landing”. This living document clearly defines urban, architectural and landscape standards for all structures to be built in the community. This ensures a cohesive and contextual mix of architectural style. It also provides the homeowners with a sense of protecting the value of their home investments as all homes in the community are held to the same standard.

The site for Carlton Landing is unique in several ways. The spring-fed portion of the lake surrounding the community flows from Longtown Creek. The topography of the land features a ridge line that runs along the southern edge of the entire site with slopes between the ridgeline and the lake shore often exceeding 15 percent. The majority of the land is densely wooded and contains gently sloping hills with grades of less than ten percent. The site has an elevation change of about 220 feet between the top of the ridge and the shoreline.

ECONOMIC IMPACT ANALYSIS

The market study for Carlton Landing was prepared by Zimmerman/Volk Associates Inc. of Clinton, New Jersey (“ZVA”). As a recognized expert in housing demand analysis, ZVA has is well respected by both public and private entities across the nation. We contracted with ZVA to perform the initial housing demand analysis for Carlton Landing. After completing an extensive regional housing analysis in 2008, ZVA presented a robust housing demand analysis and Market Position Analysis. Some of the highlights of the Market Position Analysis are:

- The market potential for new primary and second/vacation/weekend housing units to be constructed with Carlton Landing consists of up to 2,570 households.
- Approximately one-quarter of these households would be new primary homes.

- The household groups that represent the potential market for Carlton Landing include:
 - Empty nesters, some with college-aged or adult children; and retirees, with incomes from pensions, savings and investments
 - Family households, of which a significant number are affluent dual-income professionals and business owners in high-tech, research or service-oriented fields.
 - Younger singles and childless couples – including young professionals, managers and office and retail workers.
- The optimal housing unit mix offers a broad range of housing types including multi-family for-rent, multi-family for-sale, single-family attached and a diverse mix of single-family detached housing units.
- With market capture rates of only 2.8% to 3.2% of for-sale housing types, it is feasible that the market could absorb 500 homes at Carlton Landing during the first 10 years of development. Comparable developments in other parts of the county have seen capture rates of 10-15% due to the lack of competing communities.

If the market performs as projected by the ZVA analysis, Carlton Landing will serve as a major catalyst for economic development in eastern Oklahoma. Over the next 30 years, the ZVA report projects that Carlton Landing could provide more than \$150MM in newly created property taxes based on more than \$1.64B in new homes and commercial property.

	Year 5	Year 10	Year 15	Year 20	Year 25	Year 30
Total Homes to Date	317	712	1,107	1,502	1,897	2,292
Average Home Value	386,052	436,782	494,179	559,118	632,591	715,719
Total Home Value to Date (000's)	122,378	310,989	547,056	839,796	1,200,025	1,640,427
Average Annual Property Taxes	2,984	3,376	3,820	4,321	4,889	5,532
Total Annual Property Taxes	945,863	2,403,634	4,228,198	6,490,781	9,274,995	12,678,862
Total Proepty Taxes to Date	2,393,004	11,361,758	28,693,501	56,431,291	97,010,723	153,327,810

In addition to revenues generated through county property tax, Carlton Landing poses to provide a significant economic impact to the county through sales taxes and jobs creation. If we consider just the home building activity projected at Carlton Landing, over the course of the next 30 years, more than 103,000 Oklahomans could be gainfully employed for a year (based on the NAHB's estimate of 3 jobs/year created by every built home.)

CARLTON LANDING – A QUALITY COMMUNITY BY DESIGN

The design of Carlton Landing is in keeping with the tenets of the “New Urbanism”, which is a design ideology based on the traditional design of historical communities which have proven their strength and viability over the centuries. The design of Carlton Landing is best communicated through the following ten principles of New Urbanism:

1. **WALKABILITY.** Carlton Landing is designed to be a walkable community, so that most necessary goods and services can be found within a 10-minutes walk from home or work. A pedestrian friendly street design (with buildings close to the street, welcoming porches and stoops, tree-lined sidewalks, on-street parking, hidden parking lots, alley-accessed garages to the rear of the lots, and narrow, slower, safer streets) provides for the needs of vehicles while prioritizing the pedestrian and bicyclist. Some streets, such as our Boardwalk, are a pedestrian street that is altogether free from automobiles.

2. **CONNECTIVITY.** The interconnected street and pedestrian walkway grid in Carlton Landing disperses traffic and eases walking. A hierarchy of narrow streets, boulevards, and alleys present a logical framework of connections. Walking is more inviting and pleasurable in Carlton Landing due to the quality design and constructed of common areas and the public realm featuring lush landscaping, water features, and pleasing aesthetics and functionality.
3. **MIXED-USE & DIVERSITY.** A mix of shops, offices, apartments and homes will create an interesting built environment. But the soul of Carlton Landing will come from the diverse community of people – representing a broad spectrum of ages, classes, cultures and races. It is the desire of the Town Founder that Carlton Landing be comprised of a diverse population covering a wide range of tax brackets and life stages.
4. **MIXED HOUSING.** A range of housing types, sizes and price points will be offered at Carlton Landing. From rental apartments to weekend cottages to lakefront mansions, the homes in Carlton Landing will be as unique as their individual owners. Yet while the homes are different in type, size or price, they will not be segregated into different neighborhoods as is typical today. The homes in Carlton Landing will retain a close proximity to emphasize the shared commonalities of all people and create a strong sense of community.
5. **QUALITY ARCHITECTURE & URBAN DESIGN.** In Carlton Landing, there is an emphasis on beauty, aesthetics, human comfort and creating a sense of place. Special placement of civic uses and sites within the community foster and celebrate a shared civic pride. Human scale architecture and beautiful surroundings nourish the human spirit.
6. **TRADITIONAL NEIGHBORHOOD STRUCTURE:** Each neighborhood will have a discernable center, identified by a public space or civic structure, and a discernable edge, identified by a transition back to nature, so there is a sense of departure and a sense of arrival as one moves from one neighborhood to the next. The master plan is based on *the transect* (an analytical tool that integrates environmental methodology for habitat assessment with zoning methodology for community design), so that higher densities are located at the center with progressively less dense development towards the edge.
7. **INCREASED DENSITY.** In Carlton Landing, buildings, residences, shops, and services are placed closer together for ease of walking. This also enables a more efficient use of services and resources; and creates a more convenient, enjoyable place to live.
8. **SMART TRANSPORTATION.** The pedestrian-friendly design of Carlton Landing encourages a greater use of bicycles or walking as a preferred method of transportation. With goods and services located pleasantly and conveniently nearby, you might lose your car keys and not even notice!
9. **SUSTAINABILITY.** Carlton Landing provides a model for community development with minimal environmental impact from construction or operations. The homes are designed to

be more energy efficient, use less fossil fuels, and reduce the carbon footprint typically associated with new home construction.

10. **QUALITY OF LIFE.** Carlton Landing provides a high quality of life well worth living. It is a place that restores the bonds of family and friendship, celebrates the beauty of nature and the creative arts, and encourages a life of simplicity almost lost in today's culture.

CARLTON LANDING – A MODEL FOR SUSTAINABILITY

Carlton Landing is a unique land development dedicated to preserving and promoting the natural environment. The common goal is to merge an urban resort townscape seamlessly into the natural environment and to provide a continuous system of preserved greenways, parks and natural areas for its residents, guests and the general public to enjoy. The homes built in Carlton Landing have been carefully planned to utilize local materials and promote a more sustainable approach to home construction. The following are initiatives of sustainability currently underway at Carlton Landing:

THE 5-MINUTE WALK PRINCIPLE creates a town design that provides access to daily conveniences and needs expected from living or vacationing in a lakefront community – all within a 5-minute walk from the front porch. Homes sit close to sidewalks, paths, parks and other important public spaces to foster a sense of community often lost in today's rushed pace of life.

CLUSTERED DEVELOPMENT allows a concentrated "town footprint" to exist in a smaller area so that large preserves and buffer areas can be retained as part of a larger greenway park system connected by bike trails & hiking paths. Since Carlton Landing is literally being cut from the woods and made from scratch, this clustering will allow the natural beauty of Carlton Landing's site to be preserved through the construction phase.

PEDESTRIAN FRIENDLY STREETS occur at varying widths, character, and scale ensuring that pedestrians and bicyclists are at home with the "greenest" mode of transportation, feet and bikes! Diverse in design, pedestrian streets, pathways and promenades are intentionally diverse making one's trek through town all the more enjoyable. Narrower streets mean cars are encouraged to travel slower which creates a safer environment for children, bicyclists and pedestrians.

ON- AND OFF-STREET PARKING creates a lively and safe streetscape that by design, slows traffic, making it easier to park your car and forget about it and leaving more time to enjoy the scenic quality of the town.

SERVICE LANES & DRIVEWAYS are carefully situated to provide inconspicuous areas for utilitarian services such as trash & recycling pick up, utility stub-up locations, additional off-street parking and private rear yard entrances.

IMPERVIOUS PAVEMENT SURFACES are significantly reduced by building narrower streets or adding pervious parallel parking areas adjacent to drive lanes. By creating a smaller hard-surfaced footprint, far less water runoff is produced compared to conventionally scaled streets that only increase water volume and water speed. Less impervious surface equals less water runoff which in turn equals healthier, cleaner-running streams.

DOWN-SHIELDED STREETLIGHTS cast light downwards onto ground surfaces where it's most needed to help minimize the ambient light escape into the night sky where stargazing can be best appreciated.

THE CARLTON LANDING NATURE CENTER

Carlton Landing has teamed up with The Nature Conservancy to create a nature center that will be an amenity for all of Oklahoma. Through the Carlton Landing Nature Center, residents, guests and visitors of Carlton Landing will be provided with an enriching and educational experience as they reconnect with the natural world.

The proposed location of the Carlton Landing Nature Center is immediately south of Pavilion Park, the community's first common green space (as shown on Exhibit 'A' in the Addendum.) As a showcased amenity of Carlton Landing, the Nature Center will be central to the lifestyle and culture of the community. Over the coming months, the staff and representatives of The Nature Conservancy will join the Carlton Landing development team to design a nature center including trails, wildlife exhibits, outdoor picnic areas, a butterfly garden and identification of indigenous plant and tree species. The Nature Center will be available to schoolchildren and educators for field trips, nature education, day camps, seminars, etc.

The process for creating the Nature Center will involve application and coordination with the U.S. Army Corps of Engineers as well as the U.S. Fish & Wildlife Service. Grant Humphreys will lead the effort as the applicant under the umbrella of the Carlton Landing Community Foundation, Inc. (a not-for-profit community foundation dedicated to supporting the core values of Carlton Landing – Family, Creation & Simplicity.) The master plan will be conceived through the use of an open charrette process which the public is invited to attend. The charrette process, which is anticipated to take place in late September, will generate a master plan draft document to be approved by the COE and the USFWS. Representatives of both entities, as well as stakeholders from the surrounding area and Pittsburg County, will be invited to participate in the charrette process.

LIGHT IMPRINT NEW URBANISM

PROJECT STATEMENT

Light Imprint is a design methodology and operating system for consideration and incorporation of ecological performance with human placemaking. It offers stormwater and community design methodologies as a strategic tool for achieving sustainable, livable and walkable neighborhoods. The basic premise of Light Imprint is to recover and maintain the natural hydrology of the site when land is developed or redeveloped, while enhancing the pedestrian experience and operating on the scales of watersheds, neighborhoods, blocks and lots.

OBJECTIVES & CHALLENGES.

The principal objective of Carlton Landing is to create a sustainable community complete with natural amenities and features that enhance its livability while incorporating the principles of walkable, compact, ecological communities and Light Imprint. Coupled with these goals is the challenge of making the project self sufficient with community agriculture, independent water systems and private sewer treatment plant.

TOWN PLANNING & GREEN INFRASTRUCTURE STRATEGIES

Following an intense ten-day public charrette held on location and in Oklahoma City with various private and public stakeholder groups, a comprehensive town master plan was conceived. It identified the mix of commercial, residential and civic amenities in appropriate transect zones to promote walkability. Additional features include a town center composed of shops, restaurants, live/work units, and a generous park overlooking the lake. A healthy mix of condominiums, townhouses, and cottages comprise the housing offerings.

Further from the town center are houses and larger estates nestled on larger lots. Civic amenities, such as a school, a church, and a community pool are included. Coupled with a farmers' market facility for management, processing, and the sale of produce, an 11-acre town farm is reserved for to provide a secure and reliable source of food for Carlton Landing.

DESCRIPTIVE DATA SUMMARY.

In addition to the town center, Carlton Landing is designed around four distinct neighborhoods to reflect the various requirements at each transect level. The first, which features large greens, is located on the entrance road. The second is concentrated around the agricultural fields and farmers' market. The third neighborhood, located on the western side of the property, is oriented amphitheater-style around an existing pond. The peninsula on the eastern side features equestrian trails, a marina facility, and campgrounds.

Following the initial charrette, the design team returned to conduct a 5-day Light Imprint Overlay charrette to further develop the green infrastructure components of Carlton Landing. Working closely with landscape architects, civil engineers and architects, the team refined the master plan of the first phase of the development. They have preserved streams, specimen trees and drainage patterns. Identified context-sensitive infrastructure tools that are calibrated and customized for site specific variables including soil hydrology, slope conditions, climate, rural-to-urban transect zones, initial costs, and long-term maintenance factors.

Technical Advantages of Light Imprint:

- Integration and advancement of engineering and natural systems into physical urban form;
- A simple operating system, aided by the toolbox matrix and calibration tools,
- making it an accessible and a user-friendly methodology for all;
- Resolving the conflicts between policy and actual implementation, and the
- "one size fits all" approach to water management and land use;
- A context-sensitive infrastructure toolset that is calibrated and customized for
- site specific variables including soil hydrology, slope condition, climate, urban-to-rural transect zones, initial costs, and long-term maintenance factors;
- A hydrological toolset, used collectively at the sector, neighborhood and block scale, that
- uses natural drainage, traditional engineering infrastructure, and infiltration practices; and
- Corrects the deficiencies found in Low Impact Development and Best
- Management Practices often found in conventional development;

Light Imprint techniques used:

- Ecological strategy for livability and walkable, compact community standards in an economical way;
- Reduced costs associated with conventional engineering practices, typically 30 percent;
- Changed a community's mindset from a suburban model towards a new walkable, compact and ecological model and show the connection between the Local Food Movement and the Slow Urbanism Movement;
- Provided an organizational framework to complement and expand the effectiveness of Leadership in Energy Efficient Design for Neighborhood Development (LEED -ND);

- Arranged tools as 'treatment trains' for paving, channeling, storage and filtration of rainwater at the point of origin to replenish the aquifer and maintain an overall balance in the watershed; and
- Emphasized design and implementation as key factors essential to the success of every planning development project.

CONCLUSION.

Carlton Landing strives to highlight and celebrate rainwater. Instead of carrying water in underground pipes, they channelize water on the surface along parks, streets, lots, and buildings. Light Imprint will allow kids and adults to experience rain playfully, while saving infrastructure costs and making Carlton Landing more affordable and livable community.

Currently, under construction, Carlton Landing is implementing Light Imprint tools in its first phase of approximately a dozen homes, twenty additional home sites, multiple parks and community pool. Grant Humphreys, the Town Founder, has relocated his wife and family of five children to live on-site and direct the development.

Credit for the above is provided to Tom Low of DPZ.

REQUESTED LAND USE RIGHTS

The following requests are also defined on the attached Land Areas / Land Uses Matrix. Any requests mentioned herein also is considered on the Land Areas / Land Uses Matrix and vice versa.

NATURE CENTER

As previously stated, the Carlton Landing Nature Center will allow people to reconnect with nature in an enlightening and educational way. Within the Carlton Landing Nature Center area, we request the right to construct an educational nature trail including fish & wildlife educational exhibits that will allow the public to walk through the woods and enjoy the beauty of the natural lakefront area. We request permission to construct a butterfly garden, a children's tree house exhibit and create a Kids-to-Nature play area. For hosting school field trips, we request the ability to clear a small area for the purpose of creating an outdoor classroom. Lastly, we would like to construct an overlook tower so that kids and teachers can have a bird's eye perspective of the lake habitat.

ADVENTURE ZONE

The Adventure Zone will allow people to connect with nature in a more active and experiential way. Within the Adventure Zone, we request the ability to install, construct or create a Gibbon Slackline Course, a rock climbing wall, a bungee bounce area, a bouldering course, a ropes course and an area for pony rides.

WITHIN THE LAKE

In certain areas around Carlton Landing, we request the ability to withdraw water for the purpose of irrigation and water features. While protecting the existing fish habitat area currently located near the Nature Center area, we request the ability to perform underwater clearing of standing timber in certain portions of the lake south of the Carlton Landing project so that this area can be open to the public for safe boating and enhanced recreational use of this portion of the lake. In the Marina and Dock areas, we request permission to dredge and remove silt as needed to provide safe boating in and around the new dock facilities. We request the ability to have protected swimming areas in the Town Green, the Ridgeline Swimming Area, and the public swimming area on

Roundtree Landing. In certain areas, we request the ability to create no-wake zones so as to provide for the safety and enjoyment of those in canoes, kayaks and paddleboards. We also request the ability to create a floating amusement area near the Town Green or the public Swimming Beach on Roundtree Landing.

STRUCTURES

Along the trails, we request the ability to create refuge shelters (see Appendix – Exhibit F) to allow hikers to escape the elements if necessary. We request the ability to create Public Picnic Facilities (see Appendix – Exhibit G) around the swimming areas and community dock areas. On Roundtree Landing, we are excited to provide “Glamping” (glamour + camping) as an upscale camping option at Lake Eufaula with the provision of permanent structured campsites (see Appendix – Exhibit H). For those who really wish to connect with nature, we request the ability to create campsites on Roundtree Landing that would consist of nothing more than a clearing and stone ring for the fire pit. Also on Roundtree Landing (not included in the Matrix), we wish to create camping facilities that could be utilized for a summer camp. Within areas of the Corps Lands, we wish to install self-composting toilets and bathhouses for public use. Around swimming areas and community docks (and other areas as defined in the Matrix), we request the ability to construct small Commercial Concessionaire Facilities to provide for drink sales, snack sales, kayak rental, bike rental and other commercial enterprises. Within either the Adventure Zone or the Town Green area, we request the ability to construct an outdoor amphitheatre (see Appendix – Exhibit I) to provide great entertainment for the community to enjoy.

TRAILS

In various areas as defined by the Matrix, we request the ability to construct Improved Pathways (see Appendix – Exhibit E), Horse Riding Trails (see Appendix – Exhibit C) and Single-Track Mountain Biking Trails (see Appendix – Exhibit D).

INFRASTRUCTURE

Around the public swimming areas, community dock areas and the Town Green, we request the ability to construct stone retaining walls (consisting of stacked stone or placed boulders) and perform related earthwork to create safe and aesthetically pleasing access to the lakefront. The considered improvements would not reduce the lake’s flood capacity and would be approved by the Corps prior to construction. For those same areas, we request the ability to create public parking areas with a preference for pervious parking material (natural aggregate, pervious asphalt, reinforced grass lawn area, etc.). In certain areas, as defined in the Matrix, we request the ability to have vehicular access roads and the necessary easements to provide for the required public utilities to the site. All construction of said infrastructure would be approved by the Corps prior to commencing construction.

GENERAL

Some of our requests are more general in nature and apply to most of the areas defined in the Matrix. We wish to allow electric golf cart access (not gas powered) to all areas we have mentioned in this document. Gas powered golf carts will be prohibited in Carlton Landing except for the express use of Carlton Landing maintenance personnel and special permits. Electric golf carts will be treated like an automobile within Carlton Landing and shall have rights to use the roadways and designated golf cart paths within the community. We request the ability to create dog parks within most of the Corps lands (as defined in the Matrix). We request the ability to perform actions

typically defined in a mowing permit in many of the areas (as defined by the Matrix). Lastly, we request a blanket ability to clean-up debris and fallen timber as well as limited vegetation medication (to be specifically defined in the agreement between Carlton Landing and the Corps).

CONCLUSION

We appreciate the opportunity to provide these comments to the Corps in relation to the Lake Eufaula Environmental Impact Study. The Corps staff and leadership have been great to work with and we look forward to continuing our great relationship as we work through the remainder of the EIS process.

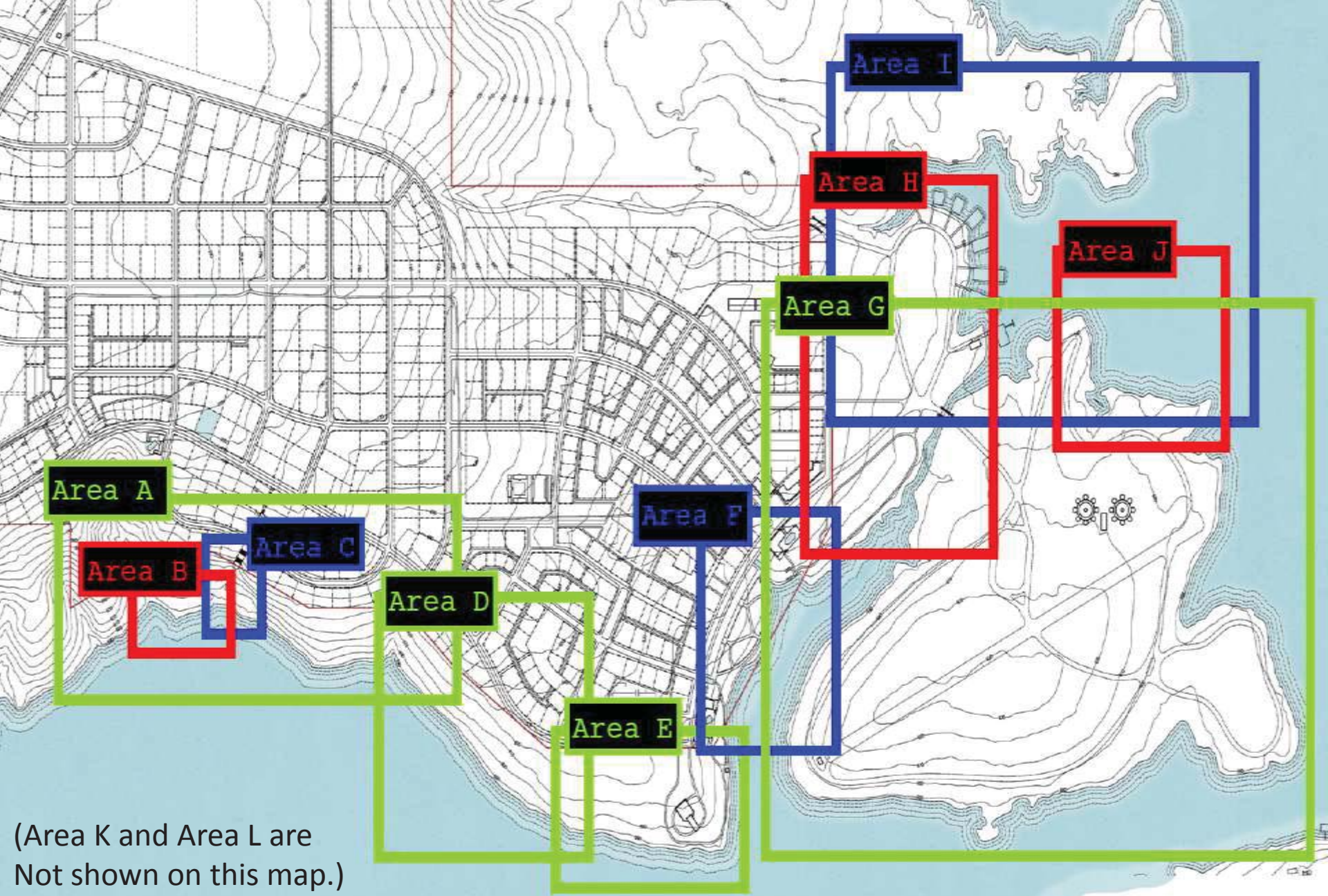
Any questions or comments directed to the Developer should be provided to:

Grant Humphreys, Town Founder
CARLTON LANDING

Mobile Phone: (918) 617-0786

Email: grant@carltonlanding.com

Mail: Post Office Box 1553
Eufaula, Oklahoma 74432



Area A

Area B

Area C

Area D

Area E

Area F

Area G

Area H

Area I

Area J

(Area K and Area L are
Not shown on this map.)

CARLTON LANDING EIS SUBMITTAL

LAND AREAS / LAND USE MATRIX

	DEFINED LAND AREAS											
	Ridgeline Trails	Ridgeline Swim Beach	Ridgeline Community Dock	Carlton Landing Nature Center	Carlton Landing Adventure Zone	The Town Green	Roundtree Landing	Eastern Shore	Carlton Landing Marina	Public Swimming Beach	Lake Area South of Carlton Landing	South Land Holdings
	A	B	C	D	E	F	G	H	I	J	K	L
Within the Lake												
Water Withdrawal	Requested	n/a	n/a	n/a	n/a	Requested	n/a	Requested	n/a	n/a	n/a	n/a
Activated Water Features	Requested	n/a	n/a	n/a	n/a	Requested	n/a	Requested	n/a	n/a	n/a	n/a
Clearing of Standing Timber	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Requested	n/a	Requested	n/a
Dredging and Silt Removal	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Requested	n/a	n/a	n/a
Protected Public Swimming Area	n/a	Requested	n/a	n/a	n/a	Requested	n/a	n/a	n/a	Requested	n/a	n/a
Protected Fish Habitat Zone	Requested	n/a	n/a	Requested	Requested	n/a	n/a	n/a	n/a	n/a	n/a	n/a
No Wake Area	n/a	n/a	n/a	n/a	Requested	Requested	n/a	n/a	n/a	n/a	n/a	n/a
Kayaking and Paddle Boarding Area	n/a	n/a	n/a	n/a	Requested	Requested	n/a	n/a	n/a	n/a	n/a	n/a
Inflatable Floating Kid's Play Zone	n/a	n/a	n/a	n/a	Requested	Requested	n/a	n/a	n/a	Requested	n/a	n/a
Community Boat Dock	n/a	n/a	Requested	n/a	n/a	Requested	n/a	n/a	Requested	n/a	n/a	n/a
Boat Fueling Facilities	n/a	n/a	Requested	n/a	n/a	Requested	n/a	n/a	Requested	n/a	n/a	n/a
Boat Storage	n/a	n/a	Requested	n/a	n/a	n/a	n/a	n/a	Requested	n/a	n/a	n/a
Structures												
Refuge Shelters	Requested	n/a	n/a	Requested	n/a	n/a	Requested	Requested	n/a	Requested	n/a	n/a
Public Picnic Facilities	n/a	Requested	Requested	n/a	n/a	n/a	n/a	n/a	n/a	Requested	n/a	n/a
Public Structured Lodging Facilities	Requested	n/a	n/a	Requested	n/a	n/a	Requested	n/a	n/a	n/a	n/a	n/a
Public Campsites	n/a	n/a	n/a	n/a	n/a	n/a	Requested	n/a	n/a	n/a	n/a	n/a
Flushless Composting Toilets	n/a	Requested	Requested	Requested	n/a	n/a	n/a	n/a	n/a	Requested	n/a	n/a
Commercial Concessionaire Facilities	n/a	Requested	Requested	Requested	Requested	n/a	n/a	Requested	n/a	Requested	n/a	n/a
Outdoor Amphitheatre	n/a	n/a	n/a	n/a	Requested	Requested	n/a	n/a	n/a	n/a	n/a	n/a
Trails												
Single-Track Mountain Bike Trails	Requested	n/a	n/a	Requested	Requested	n/a	Requested	Requested	n/a	Requested	n/a	n/a
Horse Riding Trails	Requested	n/a	n/a	Requested	Requested	n/a	Requested	Requested	n/a	Requested	n/a	n/a
Improved Walkways	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	n/a	Requested	n/a	n/a
Infrastructure												
Earthwork and Retaining Wall Construction	n/a	Requested	Requested	n/a	n/a	Requested	n/a	Requested	n/a	Requested	n/a	n/a
Public Parking Area	n/a	Requested	Requested	Requested	Requested	n/a	Requested	Requested	Requested	Requested	n/a	n/a
Vehicular Access Roads	n/a	Requested	Requested	Requested	Requested	n/a	Requested	Requested	Requested	Requested	n/a	n/a
Utility Easements and Facilities	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested
General												
Permitted Golf Cart Access	n/a	Requested	Requested	n/a	Requested	Requested	Requested	Requested	Requested	Requested	n/a	n/a
Dog Park	Requested	Requested	n/a	Requested	n/a	Requested	n/a	Requested	n/a	Requested	n/a	Requested
Rights Typical for a Mowing Permit	Requested	Requested	Requested	Requested	Requested	Requested	n/a	Requested	n/a	Requested	n/a	n/a
Vegetative Modification	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested
Clean-Up of Debris	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested



Exhibit C
Horse Riding Trails



Exhibit D
Single-Track Mountain Bike Trails



Exhibit E
Improved Walkways



Exhibit F
Refuge Shelters



Exhibit G
Public Picnic Facilities



Exhibit H
Permanent Camping Structures



Exhibit I
Outdoor Amphitheatre



**Proposed
Location of the
Carlton Landing
Nature Center**

**Adventure
Zone**

Exhibit J
Map of Carlton Landing Nature Center and Adventure Zone



Exhibit K
Outdoor Classroom



Exhibit L
Educational Nature Trail



Exhibit M
Bungee Bounce



Exhibit N
Bouldering Course



Exhibit O
Paddle Boarding



Exhibit P
Inflatable Floating Play Zone