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Department of the Army

Planning, Programs and Project Management **Division** (Hagerty)
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Concerning: Proposed lease at Coralville Lake of land to Muslim Youth Camps of America (MYCA)

I have reviewed the Environmental Assessment of Proposed Lease at Coralville Lake prepared by Zambrana Engineering, Inc. of St. Louis, Missouri dated September 16, 2002. The report confines itself to consideration of the environmental impact of four "alternatives". The first two alternatives propose leasing **land** to MYCA for two purposes: 1) to serve as a camp for Muslim and non-Muslim youth during the summer months, and 2) to serve as a retreat and conference facility for the remainder of the year. The two alternative proposals **differ** only in the intensity of use and **the** number of buildings proposed for the site. The third alternative proposes low-density recreational day use under the continuing administration of the Corps of Engineers.

The Draft, "Findings of No Significant Impact", signed by Colonel Bayles addresses only the effects of the proposals on the environment and its consistency with the Corps' Master Plan. It ignores at least two other issues of importance: 1) the religious character of MYCA, and 2) the incompatibility of the MYCA proposals with the Johnson County comprehensive planning documents.

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Implications of the MYCA proposal: The 106-acre site is now available for the use of all citizens regardless of their affiliations. Permission is not required to use the site and the only limitations of activities are those that apply generally to areas managed by the Corps. The area was leased from 1965 until 1991 by the Mississippi Valley Girl Scout Council. To the best of my knowledge, this organization did not restrict its membership to a specific religious group and it accepted any girl who wished to join. On the other hand, the purpose of MYCA as laid out in the Articles of Incorporation, is dedicated to the following objectives: (page 5 of Environmental Assessment):

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"...to establish a cultural, educational and religious (*italics mine*) membership organization for support of the youth of the Islamic faith; and
...to acquire, establish, operate and maintain a summer youth camp or camps to provide multicultural, educational *and* religious opportunities for youth of the Islamic faith."

There follows a disclaimer that "it is also meant to be a camp where non-Muslim children in general can experience cultural diversity uncommon to U.S. youth activities", but the MYCA statement of purpose would clearly relegate that to a token activity, The lease requires that "The Lessee shall not discriminate against any person or persons or exclude them from participation in the Lessee's operations, programs or activities conducted on the leased premises, because of race, color, religious, sex, age, handicap or national origin." Disclaimers to the contrary, the major purpose of the camp is to "provide... educational and religious opportunities for youth of the Islamic faith." Although the fees for leasing the land are not specified in the sample lease agreement, I assume that the fee would be nominal and the federal government would, in effect, be subsidizing the activity of an exclusive religious sect. This strikes me as being in conflict with the established policy of the federal government.

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The lease would provide a virtual gift of federal land to an organization whose purpose is to reinforce the beliefs of a specific religion in a recreational setting. My concern would be the same regardless of the religious faith. Given the historical concerns about governmental activities that can be viewed as even indirect support of religious education, the lease raises important legal questions. Have these issues been considered in the possible leasing of the land to MYCA? If so, I would appreciate learning the legal opinions on this question.

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The Johnson County Land Use Plan: I am also distressed that, with the exception of a road analysis, the concerns of the Johnson County Board of Supervisors and the County Planning & Zoning Department have been ignored. Plans that have evolved painfully and slowly over the years by county elected officials will be cast aside by Corps officers who will not experience the adverse effects of their decisions. It would be disheartening if those plans designed for the long-range benefit of Johnson county residents were trumped by the federal government simply because it had the power to do so.

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Despite my opposition to leasing the 106-acres to MYCA, I believe that their goals are commendable. They should not be accomplished, however, with a virtual subsidy from the Department of the Army. A wise decision by the officers of the Corps of Engineers should require a broader perspective than a narrow focus on environmental impact. I urge the Corps to choose Alternative #3.

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Sincerely,



Kenneth A. Hubel

Copies: Congressman James A. Leach
Senator Tom Harkin
Senator Charles E. Grassley