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

Cc: Representative James Leach
Senator Thomas Harkin
Senator Chuck Grassley

December 30, 2002

Dear Mrs. Hagerty:

I am writing to provide my comments on the recently released Environmental Assessment of the proposed lease by the Muslim Youth Camps of America (MYCA) of the Daybreak site on Coralville Lake in East-Central Iowa. The EA is inaccurate or incomplete in a number of important aspects, as noted below.

13-6

Water Supply -- The main well for the Cumberland Ridge Homeowners Association (CRHA), which is the residential neighborhood located immediately north of the proposed lease site, is located immediately adjacent to the boundary of the proposed lease. This well is missing entirely from Figure 4-2 (it is located at approximately the same location as "noise receptor 2" in the figure). Because of the topography of the land, the only location that the MYCA group could place their sewage disposal facility that would not drain into Coralville Reservoir would in fact drain directly into the CRHA well. The issue of contamination of the CRHA water supply was not addressed in the EA.

13-9

16-2

Site Cover Type -- In Figs. 4-2 and 4-3, the EA identifies the residential neighborhood immediately north of the proposed lease as "field/low density residential". This is done by lumping together some fields at the north end of the Cumberland Ridge neighborhood (near the lake) with the residential community itself. Is this not an intentional ploy to obscure the fact that there are numerous private homes located immediately adjacent to the proposed lease site? This area should be reclassified in the EA to represent the true environment of the proposed lease site.

5-3

Safety -- Numerous concerns were raised regarding safety of nearby residents during the public meeting. The basis of these concerns is the stated intention of MYCA to draw campers primarily from inner-city groups, and in particular from the Chicago area. These youth will bring Chicago-style gang activities, and a tolerance for the level of violence and drug use that this entails, to a quiet, upper-middle class residential neighborhood. The MYCA group has no previous experience in managing large camps of this sort, and there is no evidence to suggest that the camp staff will be able to effectively manage or control these high-risk youth. These safety issues were not addressed in the EA.

Sewage Disposal -- The EA concludes that there is no location within the proposed lease for sewage disposal that is adequate for the MYCA activities, and that the MYCA group will need to obtain a variance from the Iowa Department of Natural Resources (IDNR) for its sewage disposal

13-5 facility. However, in our conversations with representatives of the **IDNR**, we find that it is highly unusual for such a variance to be granted, and such a variance would almost never be granted when opposed by local land-owners. How can the EA make the recommendation that the lease be made to MYCA given this fact? The EA appears to assume that MYCA will receive a variance and does not address the pollution that improper (and currently illegal) MYCA sewage disposal will cause to Coralville Reservoir and to the water supply for the surrounding residential community.

EA Final Recommendation is Prejudicial -- The final recommendation of the EA, in favor of the MYCA lease, states that this recommendation is based on the following four reasons:

1. finding of no significant impact on the environment,
2. consistent with project purpose and need,
3. consistent with the Corps' Master Plan and designated land use for site; and
4. provides increased recreational benefit to the greatest number of users.

The **EA** is erroneous in each of these statements, as noted below.

12-1 1. The proposed project would have a very significant impact on both the natural environment and the surrounding residential community. It would result in elimination of a large and beautiful forest area, with loss of habitat for numerous species (including several endangered or threatened species, as noted in the EA). The area is particularly noted for its birds of prey (owls, osprey, eagles), and it has been the subject of many articles in the Iowa City and Des Moines newspapers praising its wildlife and aesthetic qualities. The proposed lease would also have significant impact on the local residential community by increasing traffic flow, noise, safety concerns, and raising water quality concerns. These issues were raised both by the Johnson County Board of Supervisors and by the Cumberland Ridge Homeowners Association, but were either treated superficially or completely ignored in the EA.

9-15 2. The proposed lease site is not consistent with the MYCA purpose and need for several reasons. Firstly, as noted in the EA, it does not provide for the possibility of safe or legal wastewater disposal for the level of activities proposed by MYCA. Secondly, the site does not provide for the amount of parking required for the facility, forcing MYCA to purchase buses to transport campers to the site and to attempt to purchase or rent off-site parking facilities. Thirdly, the highly laudable goals of the MYCA project would be best suited to a wilderness area with wide buffer zones of forest between it and the nearest residential community, and one that does not already receive substantial use by local residents. The proposed lease site is hemmed in by residential community and is heavily used for hunting, hiking, and skiing by area residents. In the long run, MYCA would be far better off with a more secluded location, and would also find itself with far more friendly relations and support from the surrounding community. Moreover, the MYCA project will be best served if it is placed on a less controversial site were it is allowed to progress soon. Continuation of the Corps' current intention to lease the Daybreak site will result in a long period of legal wrangling, delaying the **MYCA** plans for many years, which is certainly not in the best interest of the troubled youth that the MYCA group wishes to serve.

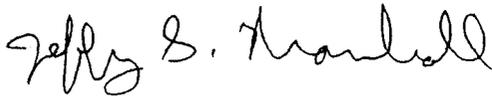
6-1 3. The proposed lease is not consistent with the Corps' Master Plan. The Master Plan zones this property as a forest area with low-impact recreational use on the level of the former Camp Daybreak. The proposed use would eliminate much of the forest and be clearly very high-impact recreational usage (as a large summer camp) and business usage (as a conference center in the other seasons).

7-10 4
It is true that the proposed lease would provide recreational and business usage of this site to a large number of users; however, the identity and purpose of the MYCA proposal would limit these users to members of a particular religious faith. Meanwhile, members of the general public who currently use this site for recreational activities would no longer be allowed to do so. Furthermore, this reason (of providing recreational usage to a maximum number of users) is itself illegitimate since it violates the Corps' own Master Plan.

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It is clear from the past many years of communications with the Corps regarding this project and from the paper trail showing how the Corps has worked with the MYCA group even prior to the original solicitation for proposals for this site, that the Corps is prejudiced in favor of the MYCA proposal. While the firm preparing the EA went through the process of holding a public meeting and soliciting comments from local organizations and governmental agencies, the many (and consistently negative) comments of that it received in these meetings and from these contacts were never adequately addressed. While I hesitate to accuse the Corps of intentionally defrauding the public, the record of the Corps actions in this regard and the seemingly intentional omissions, distortions and errors in the EA leave little room for other conclusions.

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32-4
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At the very least, the errors and omissions in the EA certainly require preparation of a full Environmental Impact Study for this site prior to issuance of the lease. I encourage the Corps to reconsider its motives and options in this matter; to consider the unanimous protests that this proposed lease has evoked from the nearby residential communities, the township of North Liberty, and the Johnson County government; to consider the liabilities that both the Corps as a whole and the individuals that are promoting this proposed lease are taking on should the safety concerns raised by local residents actually come to pass; to consider the prospect of years of legal battles with local residents and other regional entities as the issuance of this lease is blocked; and to consider the real needs of the MYCA project and goals. (Would it not be better for all concerned to find an alternative, more appropriate site for the MYCA facility and to manage the Daybreak site in a manner that is consistent with the forest/low-impact recreational zoning given to this site in the Corps Master Plan?)

Sincerely,



Jeffrey S. Marshall, Ph.D.

