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January 2, 2003

VIA E-MAIL

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

RE: Muslim Youth Camps of America, Inc. Proposal

Dear Ms. Hagerty:

On behalf of an affected property owner, I submit the following comment to the Environmental Assessment for the above proposed conference center, retreat and youth camp. Based upon the applicant's forecasts, uses other than camping will predominate if the application is approved.

Consideration of the application in light of the Old Master Plan is not warranted. The Old Master Plan is over twenty-five years old and is thus badly outdated. Master Plans were approved in 1960, 1963, 1964 and April 1977.

[Source: <http://www.mvr.usace.army.mil/Daybreak/RevPlanDoc/MasterPlan/masterplan.htm>.]

Any decision to authorize an intensive use such as the proposal, one that is unlike any other activity in the vicinity, should be deferred until the twenty-five year old plan is thoroughly updated. To fail to do so results in the application of old facts and a seriously outdated plan to a modern setting.

The old camp has been gone for over ten years. Without the former camp in operation, the development of a new plan would enable the Corps of Engineers to seriously consider the site in light of needs identified in the Old Master Plan. The Old Master Plan recognized that the region has

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"ample areas for high density recreation activities but few opportunities to escape from other visitors and enjoy quiet and solitude." Old Master Plan (OMP) p. 50.

There is great need for a new master plan before considering the dramatic design proposed for the convention center, retreat and youth camp facility with its large regional focus. Updating the plan is clearly warranted for several reasons including:

(1) the impact on the city of North Liberty, a rapidly growing community with its own developing commercial and industrial areas, a city that had not even been consulted for the 1977 plan, OMP p. 63, and a city that has the vitality to make use of the site in an appropriate fashion and within the statutory preference established by 16 USC Section 460d;

(2) the burgeoning need for recreational facilities to meet local needs, which need was recognized in the Old Master Plan, and which need has not abated since a leading growth center in Iowa consists of the Iowa City - Cedar Rapids corridor;

(3) the increased burden placed on road ways and other infrastructure from existing growth and the anticipated stress from the commercial oriented convention center;

(4) the need to reflect changes wrought by recent national and international events.;

(5) the failure to acknowledge that state and local laws remain effective with respect to private land uses upon federal lands, as evidenced by USACE regulations 36 CFR Section 327.0 ("state and local laws and regulations remain in full force and effect...") ; 36 CFR Section 327.1(e) ("all applicable Federal, state and local laws and regulations remain in full force and effect on project lands or waters which are outgranted by the District Commander by lease..."); 36 CFR Section 327.26 ("Except as otherwise provided ... state and local laws shall apply...");

(6) the opportunity to coordinate with state and local government in furthering the public interest by an appropriately sized development meeting the local demand for recreational opportunities for the general public in contrast to a commercial type venture for restricted populations to be drawn from a regional market (a regional market that has ready access to much larger water resources such as the numerous lakes in Minnesota or the Great Lakes). See 1964 Master Plan p. 4-7 (County Zoning);

(7) the opportunity to address the proper role of the federal government in advancing one particular belief;

(8) the opportunity to address use of the Coralville Lake property under current policies, such as the August 9, 1985, Recreational Planning, Development and Management Policies, ER 1165-2-400, (e.g., establishing the priority for public uses

and accommodation of non-profit groups when "available project resources and foreseeable public use requirements permit..." ER 1165-2-400, Paragraph 13.d), the July 31, 1987, Recreation Planning and Design Criteria, ER 1110-1-400, Paragraphs 1-4, 4-4, 4-5 and Chapter 7; and the February 27, 1999 EM 1110-2-503 (water and distribution requirements);

(9) the opportunity to consider recent flooding and drought scenarios on the propriety of locating large commercial structures in a hard to reach area.

6-17
The proposed use appears to be other than primarily outdoor recreation. The recreation intensive use category might have been appropriate for the site at the time when the former camp was in operation. However, if the meaning of recreation intensive use can be gleaned from the operation at that time, the current proposal is one that exceeds a reasonable interpretation of outdoor recreation in the context of the Old Master Plan and controlling law which authorizes use of civil works projects for outdoor recreation. The largest share of the calendar year and the expected largest producer of revenue will be uses other than a youth camp, with marketing directed to "regional business, educational and cultural communities." It appears the enterprise will be targeting cultural, religious, technology and language objectives in a "camp" setting. The heavy emphasis on a commercial oriented conference center overrides the prospect of enhancing the outdoor recreation use of the federal lands.

6-16
The application is contrary to the Old Master Plan. The application includes dramatic buildings of designs, materials and size that are out of place for the site. The Old Master Plan called for one basic architectural theme to the end that the buildings blended into the surroundings. OMP p. 86. The OMP calls for standardization to avoid the hodgepodge evident in the early years of the Coralville Lake facilities. OMP p. 112. Design concepts articulated in the Old Master Plan were designed to attain a balance of human factors and the environment. Multi-story buildings, copper roofs, and a 17,500 square foot convention center/ lodge replete with banks of windows, are not in keeping with the Old Master Plan.

Coordinated Planning. The Water Resource Support Center has published a Planning Manual that advocates a coordinated planning effort:

"The P&G (paragraph IV.1.4.1(a)) mandate that the planning process be a "coordinated planning effort." The Corps of Engineers has gone substantially beyond this mandate to create a Federal/non-Federal partnership in water resources planning. The planning jurisdiction for the nation's water resources is clearly Federalist in structure, with both the Federal and state/local levels of government involved."

It is time to implement the above by recognizing the need to develop a new master plan reflecting today's environment, not that of twenty-five years ago. Local government has been diligent in developing plans for the affected area. However, the Old Master Plan is clearly outdated and decisions based on that plan are not in the public interest.

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The application should be rejected and a new master plan should be developed before further action to radically change the environment at the site of the proposed convention center, lodge and related facilities.

Thank you.

Very truly yours,

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/s/

Dean A. Spina