



PHOTO BY DALE H. LASTER

SANTA MONICA CANYON CIVIC ASSOCIATION

June 14, 2006

Francis Harvey
Secretary of the Army
101 Army Pentagon
Washington, DC 20310-0101

Major General Paul E. Mock
63D Regional Readiness
Command
4235 Yorktown Avenue
Los Alamitos, CA 90720-5002

Colonel Danny Nobles
Director, Army Reserve
Division
2551 Jefferson Davis Hwy,
Room 9632
Arlington, Virginia 22202-3259

Re: Opposition to West Los Angeles Army Reserve Real Property Exchange

Dear Army Representatives:

The Santa Monica Canyon Civic Association represents the interests of residents in our canyon, which is located between the City of Santa Monica and Pacific Palisades. SMCCA was incorporated in 1946 and is one of the oldest community organizations in the state of California. Our board has carefully considered the potential impact on our community of the reference project. Our residents commute and travel through the narrow corridor created by presence of the VA campus and cemetery in Westwood, and must negotiate numerous failed (gridlocked) intersections to do so. This is one key reason why we are opposed to the current "online real property exchange" that would dispose of the U.S. Army Reserve (USAR) site located at the southeast corner of Wilshire Blvd. and Federal Ave. in an unincorporated area of Los Angeles County. This precedent setting "on-line" auction has been implemented with no notice to the public or our congressional delegation.

By employing this "streamlined" process, the Army is effectively concealing from the public and local officials important information about the project, which is apparently available only to bidders who pre-pay \$139,250 in administrative costs. We echo Congressman Waxman's concern about this inherent lack of transparency on a matter of significant public concern.

We believe the Army's process for disposing of this 10-acre parcel is inconsistent with the procedural requirements of the National Environmental Policy Act (NEPA). The Army admits that this proposed property exchange is subject to NEPA, but it has failed to follow NEPA's disclosure and environmental review requirements. By deferring its NEPA analysis until after the bidding process, the Army will foreclose significant project alternatives and

mitigation possibilities – rendering the project and its adverse environmental impacts a *fait accomplis*. That is precisely what NEPA is intended to prevent. NEPA therefore requires preparation of an Environmental Impact Statement ("EIS") *before* conducting the proposed auction.

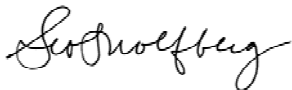
NEPA also mandates that the EIS consider the cumulative impact of the project in conjunction with other projects in the area likely to have significant impacts. These include two massive and well-known projects along the same Wilshire Corridor that will likely have significant cumulative impacts – rendering any isolated EIS analysis on the Army's project alone wholly inadequate under NEPA. SMCCA believes there must be coordinated environmental consideration of these projects and their cumulative impacts. Thus, completion of a Federal Land Use Master Plan encompassing the three projects is necessary. We support the request of the County of Los Angeles, that all further efforts on this matter be halted until the Army has prepared an adequate Environmental Assessment and EIS.

Finally, the Army's action also contravenes the donor's intent to permanently maintain a branch of the National Home for Disabled Volunteer Soldiers at the site. Contrary to that intent, the Army has unilaterally decided to proceed with the proposed "land swap" without even discussing the future use of this land with the Department of Veterans Affairs. No portion of the property generously donated for the benefit of our Veterans should be diverted to commercial or any other type of use. Indeed, it seems remarkably inappropriate to diminish care and benefit facilities available for our Veterans at the time our soldiers are returning from dangerous deployments in Iraq and Afghanistan. This is not the time for the Army to be "economizing" on the backs of those soldiers now being asked to give so much for their country. Consequently, SMCCA requests that the Department of Defense

- (1) Immediately terminate the online auction process;
- (2) Provide the opportunity for informed public comment as mandated under NEPA by preparing a full and complete EIS; and
- (3) Prepare a Federal Land Use Master Plan in order to comply with NEPA's policy against improper piecemeal planning and to assure adequate consideration of cumulative impacts due to the other planned federal projects in the area.

Thank you for your consideration of our letter. We request a written response to these issues.

Sincerely,



George Wolfberg
President

cc: US Senator Dianne Feinstein US Senator Barbara Boxer
Congressman Henry Waxman Assemblyman Paul Koretz
Assemblywoman Fran Pavley Senator Sheila James Kuehl
Mayor Antonio Villaraigosa Supervisor Zev Yaroslavsky
Councilman Bill Rosendahl Councilman Jack Weiss