

Roseann Mikos, Ph.D.

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Ventura County Watershed Protection District (VCWPD)
Attention: Theresa Stevens
800 S. Victoria Avenue, L #1610
Ventura, CA 93009-1610

November 28, 2006

RE: Comments on Draft Mitigated Negative Declaration and Initial Study for Happy Camp Canyon Channel Improvement Project, Arroyo Simi/Calleguas Watershed

Dear Ms. Stevens:

I have personally reviewed the Draft Mitigated Negative Declaration and Initial Study, plus the site plans for the proposed Happy Camp Canyon Channel Improvement Project, located in the Arroyo Simi Watershed, which is part of the Calleguas Creek Watershed.

Prior to preparing these comments, I have also made numerous site visits to view the proposed project area and to examine, inspect, and evaluate the site plans while comparing them to the site topography and to biological and hydrological/geological data there now and historically there from thousands of other personal site visits to the same area since 1981. I have the following comments:

1. Speaking as Member of Public. First and foremost, let me make it perfectly clear that I am commenting ONLY as a private citizen/member of the public—and NOT in my other roles as either an elected Moorpark City Councilmember, or as a member of the Santa Monica Mountains Conservancy Advisory Committee. As an adjacent property owner to the subject project, who lives within 500 feet of part of the proposed project, it is possible that I could be affected more so than others. Therefore, using an abundance of caution, I have or will have abstained from participating in the deliberations of each body as a member of each body. Nevertheless, as is my right, I am submitting my own comments to you and am providing and/or have provided these or similar comments to each other body—also as a member of the public (only).
2. My Qualifications Background. I have significant experience and background concerning all aspects of the Happy Camp Canyon Regional Park, having been an adjacent property owner since March of 1981, having served as an appointed member of the Happy Camp Task Force (appointed by Supervisor Jim Dougherty) in the early and mid 1980's and as an appointed member of the Regional Trails Advisory Committee (appointed by Supervisor Vicky Howard) in the 1990's. Furthermore, I have been and continue to be a volunteer docent leading hikes in Happy Camp Canyon Regional Park for the Santa Monica Mountains Conservancy since the early 1990's.

Conservatively, I have walked in the lower canyon drainage areas proposed for this project, and further upstream of this project, at least 5,000 times since 1981 (average of 200 times per year x 25 years). Actually, it is probably closer to 300 times per year for a total of 6000 visits! Either way, I know what the water does in Happy Camp Canyon.

I have observed scores of large and small rainfall events in every rainy and dry season and the effects these have had on the drainage, waterflow, and geological formations in the entire upper and lower Happy Camp Canyon areas since 1981. I have seen where water does (and does not) go, naturally, since before the Rustic Canyon Golf Course was built and after that. I know where roads have historically washed out and I know where golf course holes, some inappropriately placed (in my opinion), have repeatedly washed out since the golf course was built.

*Independent consulting services
Training and Education • Proposal Development • Organization Development • Systems
Freelance photography and writing*

3. Overview Comments. While I am pleased that the VCWPD desires to remedy potential flood hazards in the Happy Camp Canyon drainage, and welcome responsible efforts to do so, I respectfully submit that the plan proposed has a flawed design that will fail to improve flood protection there.

Furthermore, the project, as designed, will be subject to near certain catastrophic failure that will be more dangerous to the downstream residence structures and the Happy Camp Canyon Regional Park natural resources than without the project.

Given time constraints that VCWPD is faced with, regarding funding for “emergency” improvements, it is my hope that funding may still be secured in the near timeframe, but that the project can still be modified (after funding approval) to reflect a more holistic, safe, and hydrologically/geologically/environmentally friendly design.

The new design should promote more groundwater recharge and percolation upstream of and through the golf course, plus less erosion, and less accelerated debris flows from the upper canyon to and through the lower canyon reaches of the sensitive alluvial fan scrub wash, that is supposed to be protected by a conservation easement (See CUP-5107 condition # 29d).

The new design should reflect more of the mitigation measures that were suggested in the 1980’s during concept design and design development activities (including Environment Impact Report preparation/certification) for Happy Camp Canyon Regional Park more than ten years PRIOR to the present golf course proposal. I will provide relevant quotations in subsequent comments.

4. Purpose of Project Flawed (IS Section 1.4). The stated purpose of the project is “to effectively convey sediment through the Golf Course to Arroyo Simi.” While the project would attempt to do this, it is the wrong thing to do. Why? Because it would do so in a way that would also result in accelerated sediment flow velocity and a consequent significant net increase in erosion and sediment export in/from the lower canyon and its wash. These increases are in direct conflict with and violate the Calleguas Creek Watershed Management Plan.

They also directly conflict with the mitigation measures that were part of the adopted Final Environmental Impact Report (FEIR), SCH#81091106, dated December 3, 1981 for the Happy Camp Canyon Regional Park Concept Master Plan:

So as to minimize the loss of ground water recharge area, natural conditions in the project area should be retained to the maximum extent feasible. Percolation basins should be used to trap surface water runoff and allow for ground water recharge. Due to the high permeability of the lower canyon’s sandy soils, any retention facilities should be small in size.

Flood protection measures for park facilities should include the raising of pads for permanent structures above the level of flood inundation. Disturbance to the natural drainage way in the lower canyon for flood protection should be minimized by use of swales, where necessary, such as through the golf course and play area. (p. 55)

Furthermore, the proposed project is promoting a piecemeal solution to what is a much larger erosion and potential flood impact problem in a known 100-year flood plain, stemming from:

- (a) Failure to implement the above mitigations in the lower canyon;
- (b) Ignoring similar known impacts for the upper canyon, which only increase the sediment volumes that reach the lower canyon (Final Supplemental EIR, Happy Camp Canyon Regional Park Area 4 Design Development Report, SCH # 84052304, July, 1984, page II-2: *Potential and existing*

impacts to resources due to erosional problems will be reduced by various erosion control measures and proper trail construction. Primary methods will center on preventing the accumulation and velocity of water from increasing to erosional characteristics); and

- (c) Failing to mitigate for potential flood damage caused by the construction of the golf course (CUP-5107) and the **unsuccessful** implementation of CUP Condition # 52a with respect to flood control, which states:

All surface runoff and drainage from any activities shall be controlled by berms, vegetation, and/or other approved methods to ensure that surrounding land and water resources are protected from erosion, gullying, sedimentation, and contamination.(emphasis added).

For example, before the golf course was built there was a tertiary channel that allowed groundwater percolation and conveyed some runoff water in the eastern part of the lower canyon bottom, across what is now holes 1, 2, 3, and part of 4. Due to the overly wide fairways, especially for holes 1 – 3, this area cannot hold as much runoff or allow as much percolation as previously, which is why it is susceptible to destruction in a major flood event like occurred in January 2005.

Another example is the inexplicable placement of the Hole #7 fairway too close to the western steep slopes next to the main canyon bottom, at the bottom of a steep side canyon, where a historic hiking trail has been now partially blocked. This fairway is flanked on the north and east by the **main channel wash**, and on the west by the steep side canyon from which water flows rapidly during storm events. Prior to the 2005 flood, this fairway was located more to the east than presently, and allowed for a better chance for more percolation and water flow in the natural western secondary channel of the wash, as well as in the main channel. However, since the 2005 flood, the hole was reconstructed/reconfigured by building a huge berm as part of the fairway (that was NOT previously there)—virtually right up to the toe of the western slope, so that it is practically guaranteed to fail during the next major storm/flood event sequence. Since this is just to the north of the proposed NEW channel improvements, when the berm (Fairway 7) fails, it will overwhelm the northernmost reach of the proposed NEW channel, increasing velocity and debris flow, and breaking up the rock rip rap, beginning a catastrophic failure of the proposed new channel improvements. This failure can be avoided if the design is changed to allow a more natural, meandering stream flow with smaller percolation basins strategically placed in the lower canyon and something more substantial upstream of the entire golf course to keep as much water percolating into the overdrafted North Los Posas Groundwater Basin as possible.

5. Grading (IS Section 2.1.2 and Figure 4). The excess earth material to be stockpiled 15-feet high in a two-acre area within the golf course east of the main channel is an unacceptable visual impact. Additionally, it violates CDFG Streambed Alteration Agreement #R-2001-0004, Condition #28 which does not permit debris or other earthen material to “be allowed to enter into or placed where it may be washed by rainfall or runoff into, waters of the state....No rubbish shall be deposited within 150 feet of the high water mark of any stream or lake.” Clearly, the location of the debris pile is well closer than 150 of the high water mark, and it is located where it can be washed into the creek.

The illustration of the existing western channel on Figure 4 inaccurately shows the channel meeting up with the main channel instead of flowing south through the opening between the two berms, west of the main channel. This should be corrected.

6. Issue 1: General Plan Environmental Goals and Policies (IS Section 3.0). The project is subject to both City of Moorpark and Ventura County general plan policies. Under “Significant Thresholds,” the initial study states: “Inconsistency with City policies would also be considered a significant

impact.” The statement that the project would be consistent with all environmental policies in the Moorpark General Plan is inaccurate.

More specifically, the project is inconsistent with at least the following policies in the Moorpark General Plan:

- In the Open Space Space, Conservation, and Recreation Element:

- Policy 1.2: Study, monitor and link the existing Greenbelt Agreement Area to include landscaped arterial roadways as entrance ways to the City, bikeways, equestrian paths and hiking trails, to create a network of aesthetically pleasing links into and around the city.

Since the proposed 40 foot deep channel will be up to 100 feet wide and will cut off the connection to the proposed multi-use trails from the Moorpark Highlands Project to Happy Camp Canyon, this violates this policy.

- Policy 2.2: Encourage and ensure equal access to parklands for all residents, including young, handicapped and elderly.
- Policy 2.4: Encourage the development and provision of recreational activities that are both active and passive; e.g., hiking, biking, running, sightseeing, and swimming.
- Policy 4.3: Conserve, preserve and enhance the quality of biological and physical environments throughout the City of Moorpark. Require restoration of those areas unsatisfactorily maintained or subsequently degraded.
- Policy 6.2: Maintain open space lands that are well suited to their intended uses and that will result in the most efficient use of land. All such lands should be designed and managed for the convenience, health, safety and pleasure of intended users and should represent positive examples of open space planning and energy conservation.

There was not time before the due date to detail exactly how the project is inconsistent with each of the above policies. However, I would be happy to meet with VCWPD staff to explain further.

- In the Land Use Element:

- Policy 14.1: New development shall be located and designed to minimize adverse visual and/or environmental impacts to the community.
- Policy 14.2: New development shall respect, integrate with, and complement the natural features of the land.
- Policy 14.3: New development shall not contribute to or cause hazardous conditions of any kind.
- Policy 14.6: Areas identified as significant aquifer recharge areas shall be protected and preserved.
- Policy 15.1: Public & private projects shall be designed so that significant vegetation shall be maintained and protected, including riparian and oak woodland vegetation and mature trees (as defined in the City Code).
- Policy 15.3: Natural and cultural resources having significant educational, scientific, scenic, recreational or social value shall be protected and preserved.
- Policy 15.5: The City shall require developers to maintain wildlife corridors to allow for the passage of animals between designated open space or recreation areas.

There was not time before the due date to detail exactly how the project is inconsistent with each of the above policies. However, I would be happy to meet with VCWPD staff to explain further.

- In the Safety Element:
 - Policy 3.3 Require that hillside developments incorporate measures that mitigate slope failure potential and provide for long-term slope maintenance.
 - Policy 3.4: Participate in regional measures aimed at reducing the risk of subsidence throughout the City of Moorpark, the sphere of influence, and area of interest.
 - Policy 5.2: Ensure that future projects include mitigation for hydrological impacts. Mitigation can include catch basins, stormwater pipelines, and detention basins.
 - Policy 5.3: Consider floodway management design that includes areas where stream courses are left natural or as developed open space.

There was not time before the due date to detail exactly how the project is inconsistent with each of the above policies. However, I would be happy to meet with VCWPD staff to explain further.

7. Issue 2a: Community Character (IS Section 3.0). Under “Significant Thresholds,” the initial study states: “The project would have a significant impact to community character if it would disrupt or divide the physical arrangement of an established community.” It falsely states further that “...the improvements would not disrupt or divide the physical arrangement of surrounding uses.”

The proposed project **would** significantly disrupt the ability for people (and wildlife) to safely use the trail system that has historically been used in lower Happy Camp Canyon for over 25 years to link the Happy Camp Canyon Park’s lower canyon bottom to the trail on the upland plateau (also in the park), immediately west of the proposed channel improvements.

It would also disrupt the ability to safely use the trail system that has historically been used to connect the City of Moorpark immediately west of Happy Camp Canyon Regional Park to the park, also for well over 25 years.

Hikers and equestrians have historically used these trails to access the park and the trails are obvious on all aerial photographs of the project area, and on project maps used to map vegetation and protected trees in the Regional Park and golf course areas.

The City of Moorpark has kept the county informed about the proposed regional connections, yet there has been no attempt to design the project to ensure that safe and accessible trails will be maintained. As designed, the proposed improvements will make it difficult if not impossible for safe equestrian and hiking access through the deep channel with steep sloping sides that blocks the existing trail.

8. Issues 4a and 4b: Ground Water Quantity and Quality (IS Section 3.0). While the project area itself is in the *South* Las Posas groundwater basin (not an overdrafted basin), most of Happy Camp Canyon Regional Park and its drainage, primarily north of the golf course, is in the *North* Las Posas groundwater basin. The North Las Posas basin is overdrafted.

Flows coming from the North Las Posas area, because they are NOT being sufficiently trapped to provide groundwater percolation there, will be flowing across and through the golf course and contributing to more overdraft of the North Las Posas basin. The proposed project will be allowing too much of this water (that would otherwise percolate downward in the North Las Posas) to go faster

down the storm drain, to the potential detriment of groundwater in the North Las Posas Basin.

In the South Las Posas basin, the acceleration of the water into to the proposed channel will decrease percolation of the fresh rain water into the South Las Posas basin. Fresh rain water should be encouraged to percolate into the South Las Posas basin too, so as to at least partially dilute the high chloride and total dissolved solids (TDS) concentration in the groundwater there.

Given the above, the proposed project (by its lack of addressing the entire drainage/flooding problem) will indirectly decrease the net quantity of groundwater in the over-drafted North Las Posas groundwater basin. This is a significant effect that must be addressed by a more holistic design to address both upstream and downstream issues that are all part of the same Happy Camp drainage—across two adjacent ground water basins.

9. Issues 4d: Surface Water Quality and Section 5.2: Mitigations for Water Quality – Hydraulic Hazards – Hazardous Materials (IS Section 3.0 and 5.2). Creating a deep and wide, virtually straight-line channel in the canyon where one did not previously exist and where the highest water flows during rain events never occurred (at least since 1981) will substantially increase the velocity and turbidity of the surface water. Placing this channel at the toe of steep slopes and on top of a known liquefaction zone, and literally cutting into the toes of the slopes as part of the construction increases the potential for erosion, slope failure, and increased sediment flow on a long term basis. It will be nearly impossible to stabilize the sandy soil flows during heavy flow events long term.

Happy Camp Canyon Regional Park is home to a 3000 acre wilderness preserve most of which, together with the park's lower drainage area, including the proposed project area, is in an identified wildlife corridor between the Santa Monica Mountains and the Los Padres National Forest. See Figure 46 (attached) from the *South Coast Missing Linkages Project: A Linkage Design for the Santa Monica – Sierra Madre Connection*, (June 2006). Deer and other wild animals are seen regularly traversing this area so the beneficial uses of water for wildlife habitat and rare species habitat should not be dismissed as unimportant, as is implied.

The mitigations proposed in Section 5.2 focus on construction impacts to surface water with no effort to discuss long term operational impacts and what should be done to mitigate them. These long term operational impacts could be very significant.

Furthermore, some of the mitigations listed, especially bullet #2 and bullet #3, will not work. They claim to be placing construction materials, soil piles (I assume they mean the 15-foot high stock pile), and debris in areas where they cannot enter the stream flow, "away from the watercourses." Since the entire lower canyon bottom of the park is the watercourse, it seems impossible to find a place that is not susceptible to having the soil or stock entering the watercourse.

10. ISSUE 6: Biological Resources. The dominant species listed for the wash in the proposed channel alignment does not list mugwort (*Artemisia douglasiana*), yet there are significant stands of mugwort in the wash there. Since this is wetland vegetation, according to the IS/MND, it is inappropriate to call it as only "scattered." The document does list mulefat and willow as scattered and that is more accurate. Also, there are invasive species of tree tobacco and castor bean. The golf course was conditioned to remove this at least twice a year, yet it appears they have failed to do this.

During a short walk through the proposed project area last week, I noted at least the following plant species: Scalebroom, Mugwort, California Sagebrush, Coffeeberry, Willow (new), Mulefat (new), Non native grass, Telegraph Weed, Castor Bean, and Tree Tobacco.

See Photo 1 (attached) for a picture of the Lower Happy Camp Canyon Flooded Area, next to the proposed Flood Channel "Improvement." This picture was taken after the January 2005 floods and before the temporary channel digging for the artificial western channel now in the canyon and shown inaccurately on the maps provided. You can see how wide the wash is and how well the canyon held native plants, even given the significant rain event. Note the scalebroom, white sage and bush lupin (or purple sage) in the center of the picture.

The upland area to the right of the "Historic Trail" shown has significant coastal sage scrub habitat suitable for the endangered/threatened California Gnatcatcher. This would be an excellent area for additional coastal sage scrub habitat restoration and enhancement and additional trails and overlooks to enhance the park experience for non-golfers—all easily accessed using the existing trails—BUT ONLY IF the proposed channel does not cut off safe trail use as is now proposed.

While it is good that construction will avoid the breeding season of the Gnatcatcher, more mitigation needs to be done to address the prospect of finding gnatcatchers there. This lower canyon is all part of the proposed Critical Habitat Designated area in the Santa Susana Mountains that should be finalized soon. Additionally, it seems that the 2.08 acres listed for jurisdiction likely under represents the size of their jurisdiction. Photo 1 suggests a much larger area.

11. Issue 6b: Wetland Habitat (IS Section 3.0). Under "Significant Thresholds," the initial study states: "For the purposes of this initial study, significant wetland habitats are defined as performing one or more functions considered as important to the public interest (33 CFR 320.4)" and then eight functions are listed. At least the following two of those functions exist for this project:
- Wetlands the destruction or alteration of which would detrimentally affect natural drainage characteristics, sedimentation patterns, salinity distribution, flushing characteristics, current patterns, or other environmental characteristics; [It is clear that the project will detrimentally affect the natural drainage and sedimentation patterns, at the very least.]
 - Wetlands which are groundwater discharge areas that maintain minimum base flows important to aquatic resources and those which are prime natural recharge areas; [The Happy Camp Canyon Regional Park drainage is a prime known natural recharge area that cannot be ignored.]

Given the above, it is inaccurate to say that there are no wetlands and no impacts. These need to be acknowledged and mitigation measures created and implemented—even to the point of revising the project design.

12. Issue 6d: Migration Corridors (IS Section 3.0). Under "Significant Thresholds," the initial study states: "A significant impact to a migration corridor would result if a project would substantially interfere with the use of the corridor by fish or wildlife. This could occur through elimination of native vegetation, erection of physical barriers, or intimidation of fish or wildlife via introduction of noise, light, development, or increased human presence. Any impact that would substantially interfere with the use of a migration corridor is considered significant."

In item #9 above, the Figure 46 diagram (attached) referenced the wildlife corridor from the most recent South Coast Wildlands study of the area. It clearly shows the project area as an essential wildlife corridor. The proposed wide and deep channel will be erecting a physical barrier to prevent wildlife from using the natural terrain to move through the corridor to the Tierra Rejada habitat block and on through to Mt. Clef Ridge and the Santa Monica Mountains.

The impact to migration corridors is significant and needs to be mitigated with a less intrusive project design.

13. Issue 6e: Locally Important Species and Communities (IS Section 3.0). Under “Significant Thresholds,” the initial study states: “Project impacts would be considered significant if they would substantially affect a locally important species, or habitat for the species.” A conservation easement to protect the scalebroom series (alluvial fan scrub wash) was conditioned to be recorded to prevent other construction in the primary wash areas. Maps from the golf course project show that some of the proposed project area is inside what was previously delineated as scalebroom series habitat. Scalebroom can be seen there now.

There is reference to three oak trees that are proposed to be avoided. Yet at least two of these trees are heritage oaks (Tree 1 and Tree 2 from the 1999 Padre Associates study), are dangerously close to the edge of construction for the proposed new channel and/or the moved golf cart path. It is doubtful that construction that close to the drip lines of these heritage oaks will be beneficial and there is a strong likelihood that these trees would be lost as a result of the construction or the subsequent failure of the channel after a large storm event. I say this because Tree 4 (another heritage oak on the maps) was lost, as a result of the 2005 flooding.

Contrary to the statement that long term impacts to these resources would be beneficial because post-flood repairs would be reduced, the opposite is more likely. As stated previously, the proposed channel is almost certain to fail and to compromise the western slopes, harming both lowland and upland habitats and making them of lower quality because of the more frequent destruction from storm events that are being forced into a part of the 100 year flood plain where they have not often gone—at least not in the last 25 years!

See also Item #10 for more suggestions about habitat restoration and enhancement mitigation for coastal sage scrub habitat.

14. Issue 8b: Scenic Areas/Features (IS Section 3.0). Under “Significant Thresholds,” the initial study states: “a project would have a significant impact on the environment if it would ‘have a substantial, demonstrable negative aesthetic affect’. The Ventura County General Plan states that a project would have a significant impact if it would ‘degrade visual resources or significantly alter or obscure public views.’ “

The project location is in a county regional park! Parks are meant to have pleasing public views. They are proposing to have a 15-foot high pile of rocks, sand and debris, placed with nothing to obscure it or to protect it from washing into the streambed to exacerbate downstream flood and debris flow. Not only will this be unsightly to the park users but also to the neighbors on East Cambridge St. who overlook the park at its southern boundary. If allowed to stay there, the 15-foot high pile will be an eyesore and a danger to further clog the flood channel during high storm events.

While mitigation is implied, given the word “revegetation” on page 32, there are no such mitigation measures listed for either biological or visual resources. This impact needs to be addressed and mitigated.

15. Issue 15a: Erosion/Siltation (IS Section 3.0). Under “Significant Thresholds,” the initial study states: “The project would have a significant impact if it would cause substantial erosion or siltation.”

See Item # 3, 4, and 9 earlier in this letter for extensive discussion of the erosion that will certainly be caused by this project. Item #4 gives the most comprehensive discussion. This project, as proposed,

is guaranteed to speed up the flow of erosion and to increase the velocity, turbidity, and volume of debris flow in ways detrimental to the canyon natural resources and downstream homes.

Given the ineffective temporary measures taken by the VCWPD to pile up debris next to what used to be a rocky slope behind the homes, and the reduction in capacity of the 50-year flood basin south of the park and north of the East Cambridge Street homes, it is hard to accept that the document suggests there will be no significant impact. When the new channel fails, and it will (if built) it will send tons of silt crashing down into the flood basin and concrete channel and will be almost certain to back up into the flood channel behind the houses. The homeowners on East Cambridge Street watched each huge debris pile disappear in less than 30 minutes with each new strong rain during 2005. Sandbags and plastic sheeting will have little effect in the long term. The mitigation measures are inadequate and the whole design is flawed, as stated previously.

Part of the problem is that the VCWPD never removed the massive debris that is still 3-5 feet deep just north of the 50-year flood basin. While it did remove hundreds (maybe thousands) of truckloads of debris in the basin (that was not designed as a debris basin), it left so much debris IN the basin that the basin is no longer as deep as it used to be and has a dramatically reduced capacity than before the 2005 flood. As previously stated, there needs to be a more holistic approach taken that addresses upstream flows as well as downstream flows and ways to hold the water and debris farther upstream for a longer period of time. Also, there is no analysis to evaluate how well the concrete channel that goes to the arroyo could (or could not) handle such a huge increase in heavy silt and rock laden cement-like debris.

16. Issue 15b: Flooding (IS Section 3.0). While the goal stated is admirable, to increase the capacity of the Happy Camp Canyon drainage, I respectfully submit that this is not possible, given the present project design. Other comments have addressed this previously and will not be repeated. The project as designed will not be beneficial and will waste the money used to make them—UNLESS that money is joined with other funds to take a more holistic approach as outlined in the overview comments presented in Item #3 of this letter.
17. Issue 22c, 30a, 30b, and 30c: Pedestrian/Bicycle; Local Park Facilities; Regional Parks/Facilities' Regional Trails/Corridors (IS Section 3.0). Under "Significant Thresholds," the initial study states: "A project that would cause actual or potential barriers to existing or planned pedestrian/bicycle facilities may have a significant impact." It also states: "A project would have a significant impact on recreation if it would impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors."

The proposed project would erect a significant barrier to the planned connections for regional trails from Western Moorpark to Happy Camp Canyon Regional Park through the Moorpark Highlands project. The county and the VCWPD have referenced the Moorpark Highlands Specific Plan for other parts of this Initial Study/MND so they must have had it to review. There has been repeated communication with the county and VCWPD to inform them of these planned trail connections, so it is shocking that there is no mention in this document about them.

The project would have a significant impact on the use of Happy Camp Canyon Regional Park for non-golfers. The county and the City of Moorpark should collaborate to jointly facilitate at least two planned trails from the Moorpark Highlands into and through Happy Camp Canyon Regional Park instead of saying that there are or were none. I would personally be happy to help facilitate joint cooperative efforts to complete these planned types of hiking trails to allow passive uses that are totally compatible with the golf course operation and would be in keeping with the significant

historical hiking and equestrian usage of the park and the land west of the park.

See the letter from the City of Moorpark for more about these trails. See also Items #7 and #10 for more information about trails.

18. Copy of Letter of October 4, 2006. While the present letter documenting additional impacts and needed mitigations or design changes addresses many of the flood issues, I am providing a copy of a letter sent by a neighbor to ask about some of the same flood concerns (prior to the issuance of the IS and MND). I provide this for historical purposes. See especially Items #2 and #3.

Please note, that while responsible flood control improvements are both needed and welcome, the Initial Study does not have the documentation to conclude that this project would not have significant environmental effects. I respectfully request that my concerns be addressed in a revised project design and a revised environmental document.

Thank you for your consideration of these comments. Feel free to contact me if you have any questions.

Sincerely,



Roseann Mikos, Ph.D.

rmikos@bigplanet.com

Attachments:

- Copy of Figure 46 from the *South Coast Missing Linkages Project: A Linkage Design for the Santa Monica – Sierra Madre Connection*, (June 2006)—showing wildlife corridor through Happy Camp
- Photo 1: Lower Happy Camp Canyon Flooded Area
- October 4, 2006 letter from Dr. Winkler to Supervisor Mikels

CC: Supervisor Judy Mikels
County GSA Parks
Fox Canyon Ground Water Management Agency
City of Moorpark
Santa Monica Mountains Conservancy
California Dept. of Fish and Game
US Army Corps of Engineers
US Fish and Wildlife Service