



City of Moorpark

COMMUNITY DEVELOPMENT DEPARTMENT: PLANNING – BUILDING AND SAFETY – CODE COMPLIANCE

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SMMC
Attachment
November 29, 2006
Agenda Item 9a

November 20, 2006

Ventura County Watershed Protection District
Attention: Theresa Stevens
800 South Victoria Avenue, L #1610
Ventura, CA 93009-1610

RE: Draft Mitigated Negative Declaration for Happy Camp Canyon Channel Improvement Project

Dear Ms. Stevens,

The City of Moorpark Community Development Department has reviewed the draft Mitigated Negative Declaration (MND) and Initial Study (IS) for the Happy Camp Canyon Channel Improvement Project and has the following comments:

1. IS Section 2.2 – Construction. The IS indicates that construction is scheduled for fall 2006 during the dry season. This is no longer possible in 2006. Also with the biological mitigation (Page 4 of the MND and Page 51 of the IS) preventing use of heavy equipment in the western channel between February 16 and August 29 (California gnatcatcher breeding season), it does not appear that construction could begin until at least August 30, 2007. This section needs to be updated for internal consistency of the document.
2. IS Section 3.0 Issue 3 – Air Quality. The IS does not identify, analyze, or mitigate the long-term fugitive dust impacts of the stockpile or the unlined channel bottom. The mitigation measures in Section 5.1 seem to be written to apply only to fugitive dust during construction.
3. IS Section 3.0 Issue 4d – Surface Water Quality. The straightening of the flow of the surface water from Happy Camp Canyon would increase velocity and turbidity, thereby increasing the potential for erosion and sediment flow into the Arroyo Simi. The sandy soils in the project vicinity would be difficult to stabilize during a heavy flow. While the IS acknowledges that, "Increases in turbidity and settleable materials can result in physical effects that adversely affect beneficial uses related to fisheries habitat and wetlands," the mitigation measures in Section 5.2 focus only on construction impacts and not long-term operational impacts, which could be significant.

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4. IS Section 3.0 Issue 6a – Endangered, Threatened, and Rare Species. The IS notes that the site is adjacent to California gnatcatcher habitat, and an area where California gnatcatchers were observed in the past. Mitigation provided in Section 5.3 limits the timeframe during which heavy equipment can be used adjacent to the western slope of Happy Camp Canyon, however mitigation is not included for additional pre-construction surveying or what would occur if California gnatcatchers are found on or near the construction site.
5. IS Section 3.0 Issue 8b – Scenic Areas/Features. The IS does not identify, analyze, or mitigate the visual impact of the 15-foot high stockpile proposed as part of the project.
6. IS Section 3.0 Issue 15a – Erosion/Siltation. The hydrology/hydraulics of the proposed project is not discussed in the IS, yet this issue has potentially significant life safety and property damage impacts. The straightening of the channel will increase stormwater velocity and turbidity, increasing the potential for erosion. The local soils to be excavated and reused for lining the banks of the channel are very granular, also making erosion with debris flow much more likely. Furthermore, these soils do not contain the organic material needed to establish vegetation and, even if soil amendments are added, the soils may not be held together well by vegetation during a heavy rain event due to their sandy nature. Documentation is not provided in the IS as to whether these soils are appropriate for the channel sides. It should be noted that vegetation has not been well established in the existing channels due to the lack of organic material in the soil and the ongoing erosion with each heavy rain event.

In addition, documentation is not provided in the IS on the potential to erode the steep natural slopes immediately west of the proposed channel. The stability of these slopes needs to be addressed as the toes of these slopes would abut the project. Further, if debris carrying flow is increased downstream, the IS should analyze the effects on the existing drainage structures that would take this flow under City streets as well as under the SR-118 freeway. The IS does not demonstrate how the increase in flow would be handled by the channel and other downstream facilities. Blockage of these structures by debris could create substantial hazards and property damage. The IS needs to explore the use of one or more debris/detention basins upstream of this project to address potential impacts to downstream property and drainage structures.

7. IS Section 3.0 Issue 22c – Pedestrian/Bicycle. Under “Significance 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.” The City of Moorpark Circulation Element Figures 3 and 4 show a bikeway/equestrian trail connecting from the Moorpark Highlands Specific Plan development (Pardee Homes) to Happy Camp Canyon. An existing trail connects Moorpark Highlands to Campus Park Drive, and is visible on an aerial photograph of the site. The channel improvement project would cut off the

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existing trail and prevent the planned bikeway/equestrian trail connections. This would be a significant effect by the definition in the Initial Study.

While the City of Moorpark appreciates the efforts of the Watershed Protection District to improve flood control facilities that affect property in Moorpark, the Initial Study does not have the documentation to conclude that this project would not have significant environmental effects. The City requests that our concerns stated above be addressed either in a revised Initial Study or an Environmental Impact Report. Thank you for your consideration of these comments on this project. Please let me know if you have any questions.

Sincerely,



Barry K. Hogan
Community Development Director

C: Honorable City Council
Honorable Planning Commission
Steven Kueny
File
Chron