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Camarillo, CA 93012

December 2, 2012

RE: Conejo Creek EIR

Dear Planning Commission,

As the former commander of Naval Base Ventura County (NBVC) and a resident of Camarillo, I have been asked for my comments regarding the EIR for the proposed Conejo Creek development. These comments are my personal comments and I am not speaking in any capacity as a representative of the US Navy. It appears that the EIR for the Conejo Creek Development does not fully address the potential impact to Naval Base Ventura County and the potential cascade of impacts to the city and county.

One of the major problems faced by naval air stations around the country is encroachment from incompatible urban development in and around the bases. While Naval Base Ventura County Point Mugu still has open farmland around the base, it is important to carefully consider any developments which could begin to encroach on this important buffer zone around the base.

The mission of the NBVC is vital to our national security. In addition, the base provides approximately 17,000 jobs for this community with an estimated economic impact of \$1.9 Billion in annual economic value. It is hard to overstate the value of this base to the community. The base provides the types of high paying engineering and technical jobs that are highly desirable to promote long-term economic growth. It would be wise to take into account the current and future needs of the base as any developments in the base area are considered. Once development takes place, the impacts to the base are irreversible and cumulative. To look at one aspect of flight operations, as more residents move into the base flight path areas, the more complaints the base receives about the jet noise and eventually training missions are impacted, potentially reducing the utility of the base.

Other Naval bases around the country have been severely negatively impacted by encroaching development. Marine Corps Air Station Miramar in San Diego and Naval Air Station Oceana in Virginia Beach are two examples of bases where land development has made ongoing operations much more difficult for both the military as well as residents. Flight operations are risky by their nature and while the base and pilots do everything possible to reduce risks, accidents happen. When the approach areas to the runways are clear of development we have a much safer environment for both the aviators as well as the general public. Over the past few years, there have been plane crashes at both Miramar and Oceana which have resulted in civilian loss of life and significant damage to homes and apartments. The latest crash near NAS Oceana destroyed 26 residential units and killed civilians. If the pilots had not dumped their fuel seconds before the crash, the damage could have been much worse.

By working closely together with Naval Base Ventura County in cooperation with the Ventura County Board of Supervisors we can establish and protect the "military influence areas" in the county's general plan.

The military influence area covers territory where the base's mission would be taken into account when development is proposed. Among the goals: limiting traffic, keeping developments far enough away to avoid noise and safety issues, and ensuring that buildings don't interfere with air routes or provide views compromising security.

If we want to keep the jobs and economic vitality that Naval Base Ventura County provides, we should place the needs of the base as a very high priority in making land development decisions. Once the subdivisions, apartments and office buildings are built, there is no going back. Now is the time to make sure we are protecting the economic interests of our city and county by working with the base leadership to fully understand their needs and concerns regarding the military influence area.

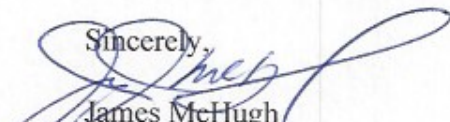
With the tightening defense spending we are seeing, it is likely we will continue to see bases around the country recommended for closure via the Base Closure and Realignment Commission (BRAC). By taking into account the future needs of our base now, we have a better chance of keeping our base open for the long-run.

As a case study in encroachment, I have provided aerial photographs of the NAS Oceana taken in 1937, 1960 and 2003. You can easily see over the years that land development around the base has been very significant. This encroachment is now causing major problems for both NAS Oceana as well as the neighboring Virginia Beach communities.

I have also attached a series of aerial photos showing NBVC Point Mugu in 1949, 1956 and 2009. In contrast to NAS Oceana, we still retain significant open space around the base.

Due to the noise and safety issues, in my opinion, open farmland is the best use of land in the pathway of a major military airfield. The EIR for the Conejo Creek development should include the findings and recommendations of the Board of Supervisors study now underway to establish Military Influence Areas as part of long term land use planning. By waiting to hear the recommendations of the study, the EIR for the Conejo Creek project would be much more complete and more accurately reflect the potential safety, noise and land use impacts which are integral to any EIR.

Sincerely,



James McHugh
CAPT USN (Ret)