



Surfrider Foundation
Ventura County Chapter – Matilija Coalition
239 W Main St., Ventura, CA 93001
(805) 667-2222 www.matilija-coalition.org



August 30, 2004

Jon Vivanti
Project Manager
US Army Corps of Engineers
915 Wilshire Blvd., Los Angeles, CA 90017-3401

RE: Comments on Matilija Dam Ecosystem Restoration Project F5 Draft Feasibility Study

Dear Mr Vivanti:

The Matilija Coalition has reviewed the Matilija Dam Ecosystem Restoration Project F5 Draft Feasibility Study and EIR/EIS. Our comments are based upon our participation as a stakeholder in the three-year multi-agency study process.

Removing a dam of this magnitude is no small task in a watershed that has seen significant floodplain encroachment and other modifications since dam construction in 1948. The Matilija Coalition's objective has been to ensure that the engineering approach to removing Matilija Dam will provide the anticipated benefits while minimizing any potential adverse impacts.

We support the plan reached by consensus of the Matilija Dam Plan Formulation committee on January 22, 2004. As the Feasibility Study demonstrates, the plan for "**Full Dam Removal with Short-Term Sediment Stabilization on Site**" accomplishes the removal of Matilija Dam to provide fish passage and restoration of natural beach sedimentation, while fully mitigating project impacts and adopting an adaptive approach to long-term project management.

We believe that the concept of "**Temporary Sediment Stabilization on Site**" is the best approach to solving the problem posed by the six million cubic yards of sediment that have accumulated upstream of the dam. Under this plan, the controlled release of sediment will provide for the gradual restoration of the natural processes that nourish coastal beaches and the associated ecosystems.

Ultimately, the renewed public trust natural resources resulting from this ecosystem restoration project will provide significant assets to the citizens of this community, the State of California, and the nation. The project will also serve as a dramatic example one of the most ambitious ecosystem restoration projects ever undertaken.

Progress on Prior Concerns & Future collaboration:

We would like to acknowledge the work effort completed by the study team in completing the F5 Draft Feasibility Report. Having being involved in the study since its inception, we understand the complexity of the issues and the competing interests in this watershed restoration project.

During the planning process we suggested design features such as a meandering upstream channel with short-term sediment stabilization, levee heights and streambank stabilization appropriate for flooding risk, slurry disposal away from popular recreation and access areas, and trails and trailheads for public use. We also encouraged full mitigation for water supply impacts and the inclusion of coastal benefits.

Our previous comment letter, dated March 24 2004, focused primarily on some of the more visible potential public impacts including the *Slurry Disposal Site*, *Levees*, and the plan for *Temporary Stabilization* of sediments in Matilija Canyon. The F5 Draft shows considerable improvements in these aspects of the project, and we believe that the impacts of these measures have been significantly reduced in the most recent project description. However, we do encourage that further refinements during the detailed design phase should be considered with the goal of enhancing the “Ecosystem Restoration” objectives of the project. Specific suggestions are include in our comments below.

We appreciate the opportunity to participate in the collaborative multi-agency process that has been so successful at generated the draft plan. We trust that our comment and input has proven to be a constructive and valuable part of this process. The Matilija Coalition looks forward to our continued involvement as a project stakeholder throughout the future design and implementation of this precedent-setting restoration project.

Comments on F5 Draft Feasibility Study & EIS/EIR

We endorse the project concept as currently defined, but understand that further refinements will be necessary to minimize impacts and maximize the “Ecosystem Restoration” objectives. Some of these issues are outlined in our comments below.

Because of the volume of the document and diffuse placement of issues throughout the Feasibility Report and EIR/EIS, our comments are based upon the contents of the entire volume and are arranged by the topic. These issues are:

- I. FLOOD CONTROL
- II. WATER RESOURCES
- III. ADAPTIVE MANAGEMENT
- IV. RECREATION
- V. FISHERIES BENEFITS AND IMPACTS
- VI. COASTAL BENEFITS

I. FLOOD CONTROL

References: Draft Feasibility Report pages 4-7 to 4-17 and EIS/EIR Section 5-2 and throughout

In general, we are concerned that all mitigation measures should be appropriate to the “Ecosystem Restoration” project objectives. It is not clear that all of the proposed levees and mitigation are required, and we believe that some of these may be built in an “environmentally friendly” or temporary manner.

We are concerned that:

- The project should be designed in a manner that balances the need to provide protection without “over-engineering.”
- Further study may show that flood protection needs could be decreased from that currently proposed. Current proposed levee additions are still based upon what has been described as “grossly conservative” estimates.

- Levees not needed once river equilibrium has been reached should be constructed in an environmentally friendly manner or removed as part of the Ecosystem Restoration project.

Flood maps – FEMA vs. modeled inundation & levee construction

The Feasibility Report indicates that, in general, the flood risk will increase in areas where development has taken place in already flood-prone areas, and levees will be raised or constructed to be equal or greater than current protection levels. Upon review, it appears that the flood plain mapping is based upon model simulations rather than the existing FEMA floodplain designation, and we believe further clarification is needed throughout.

This is most evident in the Meiners Oaks area. Figure 4-7 shows very little increase in flooding within the developed floodplain, yet a substantial levee is planned for this area. If, indeed, these residences are currently outside the 100-year floodplain, the modeling shows little increased risk to the community. If the levees are built, will the FEMA flood plain designation change? If so, this will become a growth inducing measure, allowing expansion or additions to the residential area.

Levee construction

The modeling shows a generally minor increase in flood risk resulting from the plan for removal of Matilija Dam. Most of this risk is associated with the relatively short-term increases in sediment yield until the river equilibrium is established. In areas that do not currently have levees, it would make sense to examine the possibility of constructing less intrusive means of flood protection.

For example, the modeling shows that an existing berm adjacent to the Meiners Oaks site provides a degree of flood protection. Extending or enhancing this berm may provide the desired level of flood protection while reducing impact to existing habitat and public access and recreation. This may be accomplished using on-site materials or those resulting from the construction work at Robles or Matilija dams (i.e. slurry, cobble, etc.)

Private Property Mitigation

The buyout of private property is an issue that was raised at the public meeting by residents in areas deemed to be at increased risk of flooding. The flood mapping does not appear to indicate that these properties would be exposed to catastrophic flooding. Many of these properties have been inhabited for decades, and the residents have learned to deal with occasional flooding. If possible, we encourage other means of working with these property owners in order to alleviate liability concerns, rather than risk alienating long-time residents who are otherwise supportive of the project.

Cost Effectiveness

All of the issues outlined above may present opportunities to save money in the overall construction effort. Where possible, the least intrusive option will also be the least expensive.

II. WATER RESOURCES

Reference: Feasibility Report pages 4-17 to 4-23 and **EIS** Section 5-2

There has been significant discussion relating to the impact of the project upon the local water supply. The Matilija Coalition has consistently advocated for mitigation measures to ensure that water supply

remain at or above current levels, while being appropriate to the Ecosystem Restoration project objectives.

Water supply with No Project:

It is clear from the Feasibility Study that Casitas Municipal Water District's lease for Matilija Reservoir expires in 2009, by which time Matilija Reservoir will fill with sediment and lose useable water supply capacity. Downstream sediment impacts will gradually increase over time, even if the dam remains in place. However, recent comments from CMWD suggest that there may be a future use for the dam. **The study should note that at no point during the three-year planning process did CMWD propose re-commissioning Matilija Dam for water supply as an alternative.**

Point of Clarification:

Page 2-33 states:

CMWD supplied water directly from Matilija Dam to end users in eastern Ojai via the Matilija Conduit, an underground pipeline.

This statement is not an accurate representation of the historical use of Matilija Dam and Conduit. Our review of the historic conditions indicates that Ventura County delivered water directly from Matilija Dam to the Ojai area prior to the agreement with CMWD. The CMWD agreement does not provide for the direct delivery of Matilija water, but rather the use of Matilija Dam to control downstream releases for re-diversion at the Robles Diversion facility.

Water supply "With Project":

Although the NEPA/CEQA environmental review process generally requires mitigation to baseline conditions, the program managers have committed to mitigating to today's water supply. However, the mitigation measures should be based upon appropriate analysis of current and future condition and conform to the project objectives, especially the goals of increased steelhead habitat.

The question remains: **what is the "with project" water supply?**

In order to better answer this question and in the interest of conflict resolution, there should be some analysis of the water supply benefits resulting from the preferred alternative. Analysis should include the following:

Dredge & Slurry: Two million cubic yards of fine sediments in the reservoir area will be mechanically transported downstream of Robles Diversion. This effectively eliminates short-term impacts to water supply and fish from "muddy water." However, water will be used in the slurry operation, and this water will be re-released into the watershed, entering the aquifer and becoming available to downstream diversion. This is a short-term effect, but the net impact to water supply should be considered.

High-Flow Bypass: A new radial gate in the Robles Diversion Dam will allow natural flushing of the sand and cobble that normally builds up and reduces diversions during floods. This solves an existing problem, *and* one that will continue to worsen even if the dam were to remain in place. The Feasibility Study states:

In addition, for larger flow events that may cause interruptions to diversion operations under current conditions, the bypass structure will effectively prolong the time to which diversion operations would be impacted by allowing deposition to occur more gradually.

The potential net benefit to water diversion opportunity should be quantified. Also, the final design of this facility should include optimization of water supply benefits.

Desilting Basin: This facility will also greatly enhance the current operational efficiency of the Robles Diversion facility, even though the studies show this is not necessary mitigation, hence a “local betterment.” The net benefit of this facility to water supply should be analyzed.

Foster Park Wells: Two groundwater wells constructed at Foster Park will enhance the City of Ventura’s water diversion capability. This is also included in the project even though the actual need for “mitigation” is minimal. The diversion capacity of these wells should be considered in the overall water supply, including the recapture of the slurry discharge from within the aquifer.

Arundo donax is known to use up to 10 times the amount of groundwater as native riparian flora. The removal of 250 acres of this noxious weed as part of the Ecosystem Restoration project will represent a water savings. The net benefit of *Arundo* removal to water supply should be analyzed.

Other water supply issues:

Robles Fish Passage Facility – this new facility includes an automated control system that will prove to be more efficient at controlling and optimizing diversion flows. Although this is considered to be a separate project, the increased water diversion opportunity should be considered in the overall water supply.

Water Conservation: Casitas still has not implemented 10 of the 14 Best Management Practices for water conservation that are generally accepted and adopted by the water supply industry. While analysis thus far has been concentrated on the Supply, the other part of the equation is Demand. This issue should be considered in relation to ongoing CMWD claims.

Alternate Water Supply: The Watershed Protection District has indicated that it will pursue alternate sources of water, perhaps at levels *exceeding* that which would be available if Matilija Dam were left in place. Sources may include new groundwater wells and/or connecting to the State Water Project. The impacts of such measures should be considered, both in relation to the overall water supply situation and the long-term ecosystem restoration project objectives.

III. ADAPTIVE MANAGEMENT

Due to the significant uncertainties inherent to removing a dam in this watershed, the Adaptive Management program will become a critical part of the project once it is constructed.

P4-30: The Monitoring and Adaptive Management Plan covers monitoring and adaptive management actions during the first 5 years after initial construction. After the first 5 years, monitoring and/or adaptive management becomes the responsibility of the Local Sponsor.

The hydrologic conditions of the watershed are such that the post-construction project management may extend for decades (i.e. prolonged drought, or lack of extreme flood events). In this case, the Adaptive Management will fall on the local sponsor. Assurance is needed for the budget to complete the tasks required to completely realize the Ecosystem Restoration objectives of the project.

Soil Cement Revetments and Levees:

The preferred alternative calls for the use of temporary soil cement structures in Matilija Canyon. The plan calls for the complete removal of these structures within a 20-year time horizon. Further detail should be provided on criteria for removal, methodology, and monitoring and adaptive management plans. In addition, some sort of administrative or legal mechanism should be specified to ensure that this aspect of the project is completed.

Additionally, “possible other less costly and more environmentally acceptable measures,” should be included in the final design for “Short Term Stabilization” and downstream levees. The use of native or on-site materials would minimize the need for disruptive and costly excavation and removal of the soil cement as proposed. As we have previously suggested, the ideal solution would be to engineer a “maintenance free” project that would be allowed to erode and evolve in response to the larger storm flows. Some preliminary brainstorming on this issue was reflected in the environmental working group notes of 10/27/03.

IV. RECREATION

This aspect of the project will ultimately be one of the most visible and useable public benefits of the project, and we would like to encourage further refinement of the Recreation Plan in cooperation with the local stakeholder groups.

Some specific issues that should be examined are:

Hanging Rock Trail: Removal of the dam and sediment may uncover the scenic geologic formation historically known as “Hanging Rock,” once a popular destination for local citizens and tourists. The initial plans included a “lower trail” along the stream bank that would provide access to the “Hanging Rock” depicted in historic photos. The rest area shown on the current map is located far above the stream bank so would not provide access to this site or the stream. Future planning should include provisions for this lower trail and rest area as initially conceived.

Fences and Barriers: There is a significant budget for these items, and during the detailed design phase this money may be better spent on other trail construction or access amenities.

Other trails: Connections or restoration of other trails in the vicinity should be examined in the context of creating a useable trail network. Possibilities include historic trails such as Camino Cielo Road and other trails once part of the Matilija Reservoir recreation complex. The impact of these should be carefully considered with local residences and private property owners.

V. FISHERIES BENEFITS AND IMPACTS

References: draft EIS/EIR pages 2.4 to 2.6, 4.3-32, 5.3-19 to 5.3-21, and Appendix C1 (especially pages C1-15 to C1-23), and other pages and sections scattered throughout the draft EIS/EIR.

It is clear from the report that one of the primary benefits of the project will be fisheries restoration. This is entirely dependent upon restoration of fish passage between the upper and lower watershed. Despite reports to the contrary, recent history shows that the downstream habitat is not sufficient to support a viable population of steelhead trout, and the connectivity to the perennial flows in the upper watershed is the key to survival of the species.

The southern steelhead has evolved in an environment formed by flood, fire, and drought. The plan for removing Matilija Dam will remove the majority of excess fine sediment from the system, minimizing impacts to migrating fish during the short-term decommissioning phase. Most importantly, it should be stressed that the multiple life history strategies for this species include the resident native trout in the upper watershed, which should be considered the “ace in the hole” for the recovery of this population.

- The Matilija Coalition remains concerned that additional adverse impacts to steelhead through a reduction in Ventura River flows could result if water purveyors are offered a net gain of water supply above and beyond compensation for the actual reduction in water during the remaining short-lived water storage capacity of Matilija Reservoir. We support an appropriate balance of mitigation and ecosystem restoration.
- *High-Flow Bypass*: The new sediment bypass in the Robles Diversion Dam should also be designed with fish passage in mind. Enhancing migration opportunity during higher flows will increase the restoration objectives of the project.

VI. COASTAL BENEFITS

From the inception of this project, one of the primary objectives has been to restore sediment transport down the Ventura River to the beaches. Political support was based upon the realization that this would provide significant long-term socioeconomic benefits to a region currently experiencing increased beach erosion. Natural sediment delivery to the coast will provide a long-term no-cost solution to what is becoming an increasingly costly problem throughout California. The implementation of this project will serve as a case study for such restorative actions, and provide a real-world setting in which to monitor and evaluate these benefits.

The Feasibility Study analysis indicates that the removal of Matilija Dam will gradually increase sand delivery to the coast over a 20-year period, helping to offset ongoing coastal erosion problems and associated costs. The analysis states that the beaches will receive a net increase of about 32% more sand, estimated to be worth \$19-\$29 million dollars if it were delivered artificially.

- This analysis does not include the potential value of increased cobble delivery to the eroding marine delta and associated habitat and recreational resources.
- The coastal benefits of this watershed restoration project are included merely as “Other Social Effects”, lumped in with other issues such as trucking impacts. The value of the sand alone is worth almost 30% of the project cost, so there should be some more meaningful way to add it into the system of accounts.
- It would also be helpful to quantify the increased sediment yield in terms of the local littoral transport rates, and in the context of local beach erosion and maintenance dredging at the harbor. The BEACON (1989) study provides a quantitative estimate of the net erosion experienced within the Pierpont Bay. The BEACON littoral budget analysis indicates that this coastline currently requires ongoing maintenance dredging, both to bypass the harbor and renourish upcoast beaches.
- In addition, the Corps of Engineers Los Angeles District is undertaking a coastal study to examine the potential benefit of “backpass” dredging from the Ventura Harbor. This would provide benefits to upcoast beaches, and assumes that such actions are needed. Any engineering and economic information from that study would be valuable in this Feasibility Study.

The Matilija Coalition believes that the plan for the removal of Matilija Dam presents a viable method for the restoration of the Ventura River watershed, given the many constraints of a developed floodplain. We are proud to participate as a stakeholder in this precedent setting project, and look forward to further success with the future milestones. We hope these comments are helpful in addressing some of the ongoing issues and concerns, and look forward to working with the study team in the design and planning stages of this ecosystem restoration project.

Sincerely,

A handwritten signature in black ink that reads "A. Paul Jenkin". The signature is written in a cursive, flowing style.

A. Paul Jenkin
Coordinator, Matilija Coalition
Environmental Director, Surfrider Foundation - Ventura County Chapter
(805) 648-4005