



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



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Darrell Buxton
Matilija Restoration Project Manager
U. S. Army Corps of Engineers
911 Wilshire Blvd.
Los Angeles, CA 90017

Jeff Pratt, Deputy Director of Public Works
Ventura County Flood Control Department
800 S. Victoria Avenue
Ventura, CA 93009-1600

RE: Comments on Matilija Coalition Ecosystem Restoration Feasibility Study F4 Report

Dear Mr. Buxton and Mr. Pratt;

I am writing on behalf of the Matilija Coalition, the primary public voice in the Feasibility Study process. We appreciate the opportunity to participate in the Corps of Engineers Feasibility Process.

The Matilija Coalition is a program of the Ventura County Chapter of the Surfrider Foundation, and includes eight founding organizations and more than 20 sign-on groups, all committed to the environmental restoration of the Ventura River watershed. We share a vision for the future of the Ventura River watershed without Matilija dam that includes:

- The Ventura River flowing free from mountains to the sea
- A thriving population of steelhead trout in its waters
- A healthy, native ecosystem
- A wide, sandy beach along the coast
- Opportunities for public enjoyment, education, and recreation for current and future generations

Each of these issues has major socioeconomic implications that directly affect the quality of life for local residents and visitors to the Ventura River bioregion, as well as serve as a case study for river restoration around the world. We have spent many years laying the foundation of community support, and recognize that public support is both the impetus and key for success in this project of national significance. Our comments on the Feasibility Study are based upon this community vision.

Summary of Comments:

Although a few specific comments are attached, our comments at this time are general in nature, and are intended to focus attention on some of the key issues in this complex process. The following is a summary of the key issues we have identified at this time:

- Alternative 4b provides the best opportunity to realize the benefits of ecosystem restoration while mitigating the downstream impacts.
- The HEP analysis should be updated and adjusted to reflect modifications in the project descriptions and the downstream benefits from releases of the impounded sediment.
- A project with significant adverse impacts to the community ultimately will not be feasible, so alternate slurry disposal sites should be identified as soon as possible and future project definitions should be modified before they are presented to the community at large.
- H&H analysis should be performed for the locally preferred alternative to optimize mitigation measures and minimize adverse impacts.
- The formation of the upstream pilot channel and the disposal of fine and/or coarse sediments should be optimized for maximum benefit and minimum adverse impact.

Project Objectives:

The stated objectives of the project as written in the Draft F4 document are consistent with the vision for ecosystem restoration:

- *Enhance aquatic and terrestrial habitat along Matilija Creek and the Ventura River to benefit native fish and wildlife species, particularly the endangered Southern California steelhead trout.*
- *Improve the hydrologic and sediment transport processes to support the riverine and coastal regime of the Ventura River Watershed.*
- *Enhance recreational opportunities along Matilija Creek (including U.S. Forest Service land) and the downstream Ventura River system.*

All the agencies involved in this project understand the significance of this as a nationwide demonstration of ecosystem restoration. The Corps of Engineers especially has a renewed mandate for such watershed projects. The State of California has demonstrated a strong commitment to this project based upon the perceived benefits to the coast through watershed restoration. And the County of Ventura now has a “Watershed Protection District” in place of the outdated Flood Control District, also indicating an appreciation for the larger systemic implications of this project.

In light of these broader policy implications, it is extremely important that the restoration benefits of the project are optimized to the maximum extent. The restoration opportunities, both upstream and downstream of the obsolete dam, rely ultimately upon the release of sediment downstream. Over the life of the 50-year planning horizon the

area upstream of the dam should be allowed to return to a natural condition to benefit the river and beaches downstream.

For these reasons we concur with the Corps conclusion that the NEDA alternative (Alternative 2b) would provide the greatest cost/benefit ratio, since it is the cheapest approach and completely restores natural processes. It is important to realize, however, that downstream impacts would likely be unacceptable under this scenario. **For this reason, we support the approach outlined conceptually in Alternative 4b. This alternative provides the best opportunity to realize the benefits of ecosystem restoration, while mitigating the downstream impacts.**

Project Definitions and Benefit Analysis:

To the extent that this F4 document is a draft, it provides a broad overview of the projects. In the Corps planning process, the benefits of a proposed project are established through the HEP analysis, which provides a coarse estimate of future changes in the watershed. Therefore this HEP analysis should adequately identify the differences in various project alternatives in order to provide a clear rationale for selection of the optimal project.

As currently written, it does not appear that the analysis adequately distinguishes between the project alternatives. This is especially true in the case of Alternative 4b, the “locally preferred alternative.” This alternative was assumed to be similar to the natural erosion alternatives. However, this does not take into account the more rapid restoration of the reservoir area, or the controlled release of sediments that would enhance downstream benefits with fewer impacts.

The differences in the project alternatives should be especially evident in the natural processes component. Sediment releases from behind the dam are the primary mechanism for restoring natural processes. Since the downstream reaches are currently scoured and have a deficit of approximately 2 million cubic yards, these reaches will benefit from the release of impounded sediment. However, the output of the HEP analysis places a higher value on Alternative 1 than any of the alternatives that provide this benefit, contradicting this logic.

In addition, renourishment of the main stem of the river is essential in order to realize benefits to the beaches. The HEP analysis does not directly include coastal benefits since the project area only extends to the river delta and estuary. This benefit is clearly identified as a project objective, but it does not count in the NEDA analysis.

Certain aspects of the projects have been in flux during the plan formulation process since this document was created. In particular, some aspects of the Alternative 4 plans have changed considerably. These changes would alter the benefits, HEP results, and impact analysis. For instance, the potential for a 60-foot channel through the reservoir and the addition of a high flow bypass to Alt 4b would enhance both steelhead passage through the reservoir and the natural sediment transport below Robles Diversion Dam.

We recommend that the HEP analysis be updated and adjusted to reflect modifications in the project descriptions and downstream benefits from releases of the impounded sediment.

Plan Formulation and Community Concerns:

Community concerns should be a priority in the planning process. Dam removal projects are typically controversial, and community buy-in is a key issue in creating a viable project. A project with significant adverse impacts to the community ultimately will not be feasible, as community opposition can easily prevent a “clean” CEQA review and would adversely affect funding opportunities.

Many of the project definitions currently include a slurry disposal site in the Meiners Oaks area. The site identified is a highly visible community asset. The Ojai Valley Land Conservancy, an organization that clearly represents the greater Ojai community, has already registered opposition to the use of this site.

We recommend that alternate slurry disposal sites be identified as soon as possible and future project definitions are modified before they are presented to the community at large.

Plan Formulation and Mitigation Measures:

Because the F4 Draft Report does not include current information on the Alternative 4 plans, information required to determine the benefits and impacts of these alternatives is not readily available at this time. However, Alternative 4b has been tentatively identified as the “Locally Preferred Alternative.”

Several mitigation measures have been identified relating to Alternative 4b. These include levees, slurry disposal, a high flow bypass, a siltation basin, and others. However, the Hydraulics and Hydrology (H&H) analysis has not yet been performed for this alternative.

H&H analysis should be performed in order to determine the impacts Alternative 4b, and to quantify the actual need and degree of mitigation required. This analysis should be used to optimize these mitigation measures according to set performance criteria in order to minimize adverse impacts, both of the project and the mitigation measures themselves.

Plan Formulation and Project Optimization:

The Plan Formulation Process should employ a detailed analysis to optimize the parameters of the project for maximum benefit and minimum adverse impact. In the case of the locally preferred alternative, these parameters would include the formation of the upstream pilot channel and the disposal of fine and/or coarse sediments.

The area behind the dam and currently buried by impounded sediments provides the single greatest opportunity for site-specific restoration associated with this project. Because of this, and the need for restored downstream sediment transport, the design and construction of the upstream pilot channel will provide the greatest opportunity to optimize the project. The form of this channel will affect the rate of future erosion of the impounded sediments. Possible design options include incorporation of natural meanders, placement or export of sediment, and revegetation efforts. Natural meanders would reduce channel velocities and erosion rates. Excavated sediment may be placed so

as to minimize steep slopes and enhance the natural processes within the canyon, or some of this material may be exported directly for sale or to the beach. (For example, the Surfers Point Managed Retreat Project in the City of Ventura expects to require as much as 500,000 cu yards of sand and cobble.) Although trucking of ALL of the impounded sediments has been ruled out, transport of some of this material for other beneficial needs may be justified. The truck traffic required for partial export of material from the dam site may offset existing import of aggregate from outside the county down Highway 33, and may reduce other impacts to the community. Finally, revegetation of the stabilized sediments will both enhance the stability of the upstream sediments and the restoration of the canyon ecosystem.

Similarly, the design of the slurry disposal site(s) requires careful consideration. Alternate sites may warrant partial trucking or a longer slurry line. For instance, the use of this material for agriculture has been documented as a potential beneficial use. Minimizing the impacts to the environment and the community from these mitigation measures will be a key to the ultimate success of the project.

The formation of the upstream pilot channel and the disposal of fine and/or coarse sediments should be optimized for maximum benefit and minimum adverse impact.

Conclusions:

The initial consideration of project alternatives contained within the F4 Report provides a “first-cut” look at options for the removal of Matilija Dam. At this point in time, however, inadequate information is available to make an accurate determination of the potential for success of the Locally Preferred Alternative 4b. There are outstanding issues relating to the slurry disposal site that is used in many of the alternatives. These issues need to be resolved in order to achieve public acceptance of the project. Also, further Hydraulic and Hydrologic analysis is critical to determine the effectiveness of the upstream pilot channel on minimizing potential downstream impacts.

We appreciate the work that has gone into this project to date, and also appreciate the opportunity to play a meaningful role as one of the key stakeholders. We look forward to continued progress toward developing a project description that will be acceptable to all parties in the process.

Sincerely,

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

Specific Comments on:

Alternatives Analysis Draft Report (F4 Milestone) - August 2003

Page: 30

Is this formulation for steelhead habitat what the working group agreed upon?

Page: 42

The Draft EIS indicates a loss of recreation associated with the proposed decommissioning and loss of Lake Matilija.

Page: 48

The upper conduit has not been used for water supply from Matilija Dam - rather the lower section of the conduit has been used to deliver water supplied from Lake Casitas through the CMWD infrastructure

Page: 59

are these total of reaches 9-7?

Page: 65

Diversion operating criteria have been altered to accommodate the new fish passage facility

Page: 93

why does 4b have a narrower channel base width than 4a? How does this affect steelhead passage?

Page: 93

Flood control measures should be "fine tuned", since this assumption is "worst case" based upon Alt 2a.

Page: 94

is this drawn to scale based upon the historical topography? has a detailed analysis been done for the profile generated based upon actual quantity of sediment to be stabilized? It seems this is a steep profile and may be optimized based upon historic data.

Page: 95

see comments on Alt 4a

Page: 106

Further analysis of Alternative 4b is required to optimize levee design.

Page: 107

However, turbidity impacts are currently close to equilibrium conditions, as Matilija Dam trap efficiency for fines has become limited by its capacity.

Page: 108

Further modeling for Alternative 4b is essential in evaluating impacts and mitigation measures.

Page: 109

Increases of 20 to 37% in coastal sediment delivery ARE a significant benefit to the shoreline. Coastal erosion has been identified as a primary objective of this project, and offsetting the 50 year deficit is significant.

Page: 109

How are coastal benefits accounted for in the NEDA evaluation of project alternatives?

Page: 114

The slurry has been added to Alternative 4a.

Page: 114

Impacts to steelhead from Alt 4a would be far less than alts 2 & 3 because of the pre-formed pilot channel. This channel will (1) restore steelhead passage more rapidly and (2) release far less sediment and in a far more controlled manner than alternative 2.

Page: 116

Hanging Rock may also be considered a historical resource, to be restored by this project

Page: 117

Truck traffic should be considered in relation to existing truck miles from current import of aggregate in to the county from Hwy 33 as well as nearby quarry operations - if Matilija sediments are similar material then this impact may be offset.

Page: 120

Flooding and levees associated with alternative 2 would have similar or greater impact to the community than trucking.

Page: 124

How can the trucking alternative have a higher natural process value than natural transport? The river suffers from a deficit of 2 MCY which is not restored without the release of sediment from the reservoir.

Page: 124

Alternative 4b should have a higher steelhead value than the natural transport alternatives since the pilot channel would provide more rapid restoration of steelhead habitat and passage through the reservoir area.

Page: 125

The cost of mitigation measures for flooding and water diversion should be included in the NER analysis

Page: 126

This alternative has not had the level of analysis as alternatives 1-3. Further analysis is required to determine the mitigation requirements as compared to the other alternatives.