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**RE: Comments on the Matilija Dam Ecosystem Restoration Feasibility Study  
Alternatives Formulation Briefing Report (AFB) Milestone**

Dear Jon,

Thank you for the opportunity to review and comment on the Alternatives Formulation Briefing (AFB) documentation for the Matilija Dam Ecosystem Restoration Project. We recognize that the project is still undergoing changes, and would like to take this opportunity to call attention to some of the issues we feel are important to the ultimate success of this complex and precedent-setting project.

At this time, we remain concerned about the following details of the plan:

- 1. Slurry Disposal**
- 2. Levees**
- 3. “Temporary Stabilization”**
- 4. Coastal Benefits**
- 5. Fisheries benefits and impacts**

On September 26, 2003 we identified several key issues in our written comments on the F4 Report:

- *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.*

- *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.*
- *H&H analysis should be performed for the locally preferred alternative to optimize mitigation measures and minimize adverse impacts.*
- *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.*

While some of these issues have been addressed, others remain in critical need for attention. While we support the conceptual consensus plan for removing Matilija Dam, our primary concern is that **the project as described in the AFB Report would result in impacts that are unacceptable to the local community**, while the benefits are still not clearly represented. Of particular concern is the fact that the project definition in the AFB Report still includes the original slurry disposal site, provides for over-designed levees, and does not describe removal of soil cement from Matilija Canyon.

The AFB Report states that:

*The features included in the recommended plan are currently designed to develop reasonable cost estimates to assess the cost of alternatives and the recommended plan as well as environmental impacts. In some cases such as the design of mitigation measures, the design and construction requirements are somewhat conservative to assure impacts would be fully mitigated. During the Preconstruction Engineering and Design phase, further studies will be made to refine information on the magnitude of impacts and mitigation requirements. This will include consideration of possible other less costly and more environmentally acceptable measures.*

And:

*A public review will be conducted on the next phase study document which is the complete draft report and NEPA /CEQA documents and the comments received will be considered in making a final decision on to pursue the recommended plan.*

Considering that the Matilija Dam project is intended to achieve “Ecosystem Restoration,” it is essential that innovative and nonstructural approaches be considered in the planning process. Indeed, it is quite likely that these “*other less costly and more environmentally acceptable measures*” will be necessary in order to pass NEPA/CEQA review and gain public acceptance of the project. For this reason we suggest that the “Preconstruction Engineering and Design phase,” (which would follow both the environmental review and project authorization) is too late to be refining the project to acceptable impact levels.

## **1. Slurry Disposal**

As we stated in September 2003,

- *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.*

The project description still includes the use of a slurry disposal site that has been clearly ruled unacceptable to the local community. We understand that this issue is currently being refined, but we must insist that this be resolved prior to the release of the public review document.

## **2. Levees**

Levee and floodwall design is still at the extreme conservative estimate level of analysis. The primary case in point is the new mile-long levee and floodwall planned for Meiners Oaks. Other examples exist downstream adjacent to recreational and vista areas of the river.

It is essential that this analysis be refined, and alternatives to traditional concrete floodwalls be considered in order to maintain the aesthetic and recreational values of the river. This is a clear opportunity to investigate “*possible other less costly and more environmentally acceptable measures.*” This must occur prior to the public review period.

## **3. “Temporary Stabilization”**

At no place in the project study boundaries is the opportunity for restoration greater than in the area upstream of the dam. Our position has been that careful and creative design of the upstream channel will allow for a degree of control over sediment releases that will provide the maximum benefits for river restoration while minimizing the downstream impacts. The design for the channel upstream of the dam including meanders that mimic pre-dam conditions reflects this approach. The most recent Hydraulics and Hydrology (H&H) studies indicate that this is a feasible design approach for dam removal on the Ventura River, and takes into account the constraints imposed by the developed floodplain downstream.

The design for “temporary stabilization” depicted in the AFB report shows large volumes of soil cement placed the entire length of the constructed channel on the left bank as well as protecting an environmental site on the right bank outside of the excavated channel. Although it has been stated that this design is intended to be subject to further review and refinement, we are concerned that this level of streambank hardening would hinder or negate the “ecosystem restoration” objectives of the project. The report states that:

*All soil cement revetment would be removed from the site following sufficient evacuation of stored sediment from within the original reservoir limits.*

and;

*While removal of the remaining trapped sediment will be variable and dependent upon the hydrology, it is assumed that within 20 years of initial earthmoving and deconstruction activities, the re-vegetation phase will be completed.*

We are concerned that the AFB Report does not provide any description of how or when the removal of the soil cement would occur. Therefore it is not clear how the soil cement would be removed, or whether this has been budgeted as part of the project. Further detail should be provided on criteria for removal, methodology, and monitoring and

adaptive management plans.

Moreover, we would like to see “*possible other less costly and more environmentally acceptable measures,*” in the design for “Temporary Stabilization”. The use of native or on-site materials would minimize the need for disruptive and costly excavation and removal of the almost two miles of soil cement proposed.

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:

*Can we recycle dam concrete material as “temporary stabilization” along new pilot channel?*

*a. Use boulders found on site during channel excavation*

*b. Use large dam chunks (without rebar)*

*c. Use small dam material w/ new concrete and gravel to make large boulders*

*Is it necessary to stabilize all of Reach 7? Upstream Channel area may be more stable?*

#### **4. Coastal Benefits are not included in the Study**

In the AFB Report, one of the stated project objectives is to:

***Improve the hydrologic and sediment transport processes to support the riverine and coastal regime of the Ventura River Watershed.***

The AFB Report also describes one of the impacts of the dam as:

***... the loss of sediment transport contributions from upstream of the dam, with resulting erosion to downstream reaches of the Ventura River, the estuary and the sand-starved beaches along the Ventura County shoreline.***

The only mention of potential coastal benefits for increased sediment transport is as a “benefit” in the impact analysis summary in Table 4-7:

***Earth Resources: As more sediment is allowed to migrate down river and eventually enter the littoral zone of the ocean, it could result in more deposition of sand onto local beaches and contribute to increased beach width over time.***

However, the remainder of the report does not include a logical assessment of the potential coastal benefits of the project from the restored hydrologic function of the watershed. In particular, the report draws the conclusion that:

***There continues to be a desire for using some of the reservoir sediments that is compatible for beach restoration. However, the high costs and very disruptive activities required to bring this material to the coast is considered excessive, particularly as compared to obtaining the material from other sources.***

This statement does not reflect the stated intent of the project to restore “natural processes” to benefit the overall ecosystem. Further work is clearly needed on this issue.

## 5. Fisheries benefits and impacts

Further work is needed to better assess the potential benefits and impacts to the steelhead population. It is likely that the fisheries restoration benefits are overstated in the text:

*...the Recommended Plan could increase the numbers of adult steelhead from less than 200 existing adults to pre-dam conditions of 4,000 to 5,000 adults in the Ventura River system.*

Because of biological uncertainties, we would caution against using projected populations as a measure of success for the project.

There is also a need to assess the potential impacts to the fish populations with the proposed project. Based upon experience with dam removals elsewhere in the country, we are of the opinion that the long-term benefits will far exceed any short-term impacts. However, expert biological assessment is needed to describe this rationale and should be included in the impact analysis.

### Conclusions:

One of our fundamental concerns is public acceptance of the project. We realize that the ultimate hurdle, project funding, relies upon full support for the project. Although the community in general is supportive of dam removal in concept, design details will raise issues among residents of the watershed. Potentially unacceptable impacts to the community include the disposal of 2 million cubic yards of fine sediments and the construction of new levees in popular recreational or residential areas. Alternative slurry sites have been identified, but the project description still describes a site that has met opposition from the Ojai Valley Land Conservancy and other residents.

All of the issues outlined above should be resolved in order to present a clearer picture of the potential benefits and impacts of the project. This is needed for the public review phase to provide assurances to the community who will ultimately be living with the effects of the project for decades to come.

Sincerely,



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