



***Surfrider Foundation***  
Ventura County Chapter – Matilija Coalition  
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Date: March 2, 2001  
To: Interested Parties  
From: Matilija Coalition

**RE: Matilija Dam Draft Project Management Plan (PMP)/Scope of Work**

Thank you for the opportunity to review and comment on the Draft Project Management Plan (PMP)/Scope of Work prepared by the Army Corps of Engineers (ACOE) for the Matilija Dam removal project, dated February 2001.

The following comments are provided on behalf of the Matilija Coalition, a group of environmental and citizen organizations working to restore the Ventura River watershed through the removal of Matilija Dam. The Matilija Coalition is the primary public interest group involved in this issue, and we are part of the multi-agency effort to decommission Matilija Dam.

While we understand that the ACOE's PMP will be a living document and is likely to change as needed throughout the feasibility phase of the project, the Matilija Coalition feels that there are some fundamental elements of the project that must be set in stone prior to initiating a contract between the ACOE and Ventura County. Our two areas of primary concern with the draft PMP are: 1) the seeming lack of coordination with other agencies; and 2) the narrow scope of the project objectives. Our comments in each of these areas are addressed in more detail below, as are two additional areas of concern:

- 1) Coordination with Other Agencies
- 2) Scope of Project
- 3) Programmatic Issues
- 4) Final Product

**1) Coordination with Other Agencies:**

The Matilija Coalition is greatly concerned that the previously agreed upon multi-agency, cooperative approach appears to be missing from the draft PMP. We understand from the March 1 meeting in Ventura that this part of the PMP is being revised. Our position is that a cooperative, multi-agency approach will be critical for the success of this effort.

This multi-agency approach to the Feasibility Study is essential to ensure that the studies already completed and planned by other agencies are utilized and more importantly to ensure that these studies are not duplicated—which would be both a waste of time and money. Much work has already been accomplished or planned, and should be coordinated through the PMP. For example, the Geotechnical Studies Section does not reflect the proposed Bureau of Reclamation (Bureau) work plan scheduled for March 2001. Nor does the alternatives analysis in the draft PMP reflect the work already completed by the Bureau in their Appraisal Report from April 2000.

Furthermore, the local sponsor (i.e. County of Ventura) should play a primary role in the project management because they bear 50% of the feasibility study's cost. Including the local community in the process is also important, because they will not only be the beneficiaries of the restored Ventura River watershed, but their by-in to the project is important to create the local stewardship necessary to ensure the effort's long-term success.

## 2) Scope of Project:

The Matilija Coalition feels that the proposed objectives in the ACOE's draft PMP are too narrow in scope and do not reflect the true purpose of the project. We fully support the previously agreed upon proposed objectives for the feasibility study, published in the April 2000 Bureau of Reclamation Appraisal Report:

- 1) improve aquatic and terrestrial habitat along Matilija Creek and the Ventura River to benefit fish and wildlife species, particularly the endangered Southern California steelhead;
- 2) restore the hydrologic and sediment transport regime to support downstream coastal beach sand replenishment conditions; and
- 3) enhance recreational opportunities along Matilija Creek (including U.S. Forest Service land) and the downstream Ventura River system.

The scope as defined in the ACOE's draft PMP is limited to objective (1) above; habitat enhancement for steelhead. Without question, the PMP's objectives should be expanded to include beach nourishment and restoration of Matilija Creek, the dam site, and the main stem of the river as primary objectives and not merely "incidental benefits".

- **Beach Nourishment:** The ACOE is the primary agency involved with shoreline management nationwide, and has a complex ongoing shoreline maintenance program in Ventura County—where beach erosion is a serious problem and where the highest percentage of hardened shoreline exists in California. The Matilija Dam has played a major role in this erosion and shoreline recession by impeding the littoral sediment supply to the coast for the past half century. Further, the beach nourishment aspect of removing Matilija Dam potentially provides the most significant economic benefit of the project. And this potential economic benefit is a major reason why both Ventura County and the surrounding community are so supportive of the idea to remove the dam.

Yet, the draft PMP treats beach nourishment as a secondary objective and only gives brief mention of coastal issues within the Hydrology and Socioeconomic sections. Given all of these factors—the ACOE's role in, the impact Matilija Dam has on, and the project's potential economic benefits in regard to beach nourishment—both the short-term benefits gained from using the impounded sediment for beach replenishment, and the long-term restoration of this critical sediment supply should be a primary focus of this project. The PMP should be revised to include beach nourishment as a primary objective of the project.

- **Ecosystem Restoration:** The ACOE has identified "ecosystem restoration" as a national objective for its work on the feasibility study, with "contributions measured by changes in the amounts and values of habitat." Further, in the draft PMP the ACOE has identified "restoring the Matilija Creek ecosystem and terrestrial and

aquatic habitat” for the southern steelhead trout as a main objective of the feasibility study.

However, throughout the draft PMP, the ACOE suggests proposed activities that will result in further damage to this habitat. For example, every alternative proposed by the COE in the project management plan assumes “natural re-vegetation” or “natural vegetation” as an outcome of the dam removal effort. All parties currently involved in studying Matilija Dam have documented the growing reach of *arundo donax*, a non-native riparian plant species, which has an extensive population in the reservoir, as well as in the 20-mile length of the Ventura River. Removing this species is a critical component of improving steelhead habitat and water quality (a sub-component of the steelhead habitat improvement objective). This formal re-vegetation effort must be considered as part of the ecosystem restoration feasibility study, as well as the final project’s design and implementation.

In other parts of the draft PMP, the ACOE uses the words “study area” and “watershed” interchangeably, as if project consultants were going to survey the full 116-mile Ventura River watershed. In fact, the ACOE’s draft PMP is narrowly focused on the study area, which includes the reservoir and a (? Does it include the entire downstream portion of the river?) downstream portion of the Ventura River. Because the steelhead habitat in Matilija Creek upstream from the dam was historically the most productive steelhead spawning and rearing habitat in the Ventura River system, we believe that the ACOE must extend its proposed environmental studies (and ecosystem restoration objective) to include a significant portion of the watershed to ensure that non-native species such as *arundo donax* are properly surveyed and addressed systematically.

### **3) Programmatic Issues**

The PMP should include a description of the method of project oversight, particularly the role of the local sponsor, Ventura County. Because the local sponsor shall bear 50% of the cost of the Feasibility Study, their role in the project should be clearly defined so that as the client, they are assured of the final product.

The draft PMP should be refined to include more detailed specification in the following areas:

- **Risks and Mitigation:** The only risks discussed concerned cost overruns. Technical and schedule risks should also be addressed. The 20% reserve is a good general rule, but it would be more credible to have a list of high-risk areas, the potential for the risk manifesting, and an estimate of mitigation costs. Risks should be presented for each item in the Statement-of-Work, and then followed with the Contingency Plans that have been formulated to mitigate each risk.
- **Schedule:** The draft PMP contains key milestones only, and there is no Master Schedule (a minimal requirement), no network or precedence charts, and no Gantt charts presented. The Matilija Coalition assumes that these documents are in another format and, for some reason, were not included in this submittal. However, the schedule data should be included in the PMP. A master schedule and a precedence network are necessary to understand how this various aspects of this project will fit together and to ensure that the project is not a series of disjointed and unconnected studies.

- **Personnel:** No Work Breakdown Structure was presented in the draft PMP. The Matilija Coalition also assumes this exists somewhere and would like it to be made available publicly. The Statement of Work should identify agencies/organizations that will complete specific tasks. In areas of high risk, particular individuals with specialized talents should be selected and enlisted to ensure programmatic success.
- **Financial:** This is the least developed area of the draft PMP. There was no mention of any Earned Value system. There were also no spending profiles shown. In the case of Hydrology, \$790K would be spent on one milestone. Planned expenditures on this major sub-task, and all the others, need to be “broken out” in finer detail to enable project tracking. The Matilija Coalition recommends an earned value system with spending profiles for the program—and with much more detail included for the first year.

#### 4) Final Product:

The draft PMP defines the output as a series of study reports. The Matilija Coalition contends that the output should be a specific plan for decommissioning the dam and restoring the watershed.

Because it is universally agreed that the dam should be removed, the most important output must be a recommendation on the best way to carry out the removal. Furthermore, the removal recommendation should be “fleshed out” such that all the elements of the removal approach have been designed and priced. Elements would include, but not necessarily be limited to:

- Design approach as shown in top level drawings
- Drawing package containing all major subsystems
- Lists of potential vendors for critical activities and builds
- Cost information
- Preliminary program plan

In other words, assuming that funding is available, a selected contractor could be in a position to begin removing the dam immediately after the final feasibility study is published. It is not apparent from the draft PMP that enough information will be available to make this transition smoothly.

We hope that these general comments are helpful in revising the draft PMP, and request that copies of the revised PMP be made available before the next Steering Committee meeting.

Sincerely,

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