



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
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TO: Darrell Buxton, Project Manager, US Army Corps of Engineers
Jeff Pratt, Deputy Director, Ventura County Watershed Protection District
Members, Matilija Dam Fine Sediment Study Group

FROM: Brian Cluer, Ph.D., Fluvial Geomorphologist, Habitat Conservation Division
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SUBJECT: Comments on Draft Report of the Fine Sediment Study Group

The draft report is reasonably comprehensive and accurate. It is important to clarify language on two topics.

1. The reference to "conforming to the maximum extent possible" to the existing environmental and decision documents has generally referred to the NEPA/CEQA documents and the Chief's Report upon which project's Congressional project authorization rest. Regarding the NMFS Biological Opinion, it is clear that even without re-initiation, project elements that were not well defined would be subject to additional NMFS review, even within the context of the existing BO. NMFS identified data gaps for Alternative 4b (measurable water quality impacts, flexibility in Casitas water supply and delivery system) and for Project components unrelated to 4b (incremental notching expertise). Any changes to the Project that were not analyzed in the biological opinion will require further analysis and possibly reinitiating formal consultation.
2. The discussion on leaving a large amount of the sediment upstream of the existing dam site should be clarified, the language is ambiguous. The draft report uses terms like "naturally stabilizing a major volume of the fine sediments" and "maximize upstream storage" and "naturally stabilize in Matilija Canyon". To some this may simply be a resurrection of the abandoned USA options for permanent upstream storage. The language used should be clarified to reflect the consensus that permanent, artificially maintained storage of sediment was not ever part of 4B or authorized in the BO (though the sediment study group discussed the possibility of using some of the sediments outside of the existing riparian corridor to stabilize Matilija Road).

Regarding the Study Group recommendations:

NMFS offered to provide regulatory guidance and design criteria on habitat and water quality thresholds. NMFS requested to be engaged in design discussions early & often during the process. At this time, no absolute turbidity thresholds exist for steelhead. The discussion presented on pages 20-21, and 26-27 of our biological opinion summarizes the important concepts in regards to fine sediment release and elevated turbidity effects on steelhead. NMFS reiterates the importance of minimizing chronic turbidity beyond the normal duration that steelhead experience in the Ventura River watershed. If prolonged high turbidity occurs only after infrequent flood events (e.g., interval of 5 years or greater), then short-duration, high turbidity would probably not have a significant impact on steelhead production in the Ventura River watershed. Projected short-term sediment-related effects on steelhead are expected to be offset by the long-term ecological benefits of dam removal in the watershed.