January 27, 2011

Matilija Dam Ecosystem Restoration Project
Fine Sediment Study Group

Re: Concerns with proposed silt disposal sites

Dear Group,

The Ventura River County Water District (VRCWD) would like to formalize our concerns with the disposal sites, particularly BRDA and MODA and the mitigation measures we feel are required to mitigate these concerns.

Concern 1
The upstream BRDA site leaves a gap between the east bank and the proposed sediment pile which will create an island in the river and direct flow towards the homes on the east bank and VRCWD wells, pump station, maintenance yard and office.

Mitigation
Extend the silt disposal pile northeast and tie it into the existing bank above the location where the OVSD sewer main enters the riverbed (see enclosed aerial photo). This will prevent the deliberate diversion of flood waters that would endanger the homes and VRCWD facilities.

Concern 2
Groundwater quality: the contaminants currently in the silt will percolate into the groundwater and cause violation of the State/Federal Maximum Contaminant Levels (MCL’s). The leaching of the contaminants will occur during two distinct times. The first will be when the silt is delivered to the disposal site via slurry pipe and spread over the permeable soil. The second will be over time as rain runoff washes silt off the pile and deposits it onto the adjacent permeable soil. The following is a list of a few of the contaminants as listed in the EIR/EIS:

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>Measured</th>
<th>State/Federal MCL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nickel</td>
<td>23 mg/kg</td>
<td>0.1 mg/L</td>
</tr>
<tr>
<td>Copper</td>
<td>35 mg/kg</td>
<td>1.0 mg/L</td>
</tr>
<tr>
<td>Mercury</td>
<td>0.18 mg/kg</td>
<td>0.002 mg/L</td>
</tr>
<tr>
<td>Arsenic</td>
<td>8.2 mg/kg</td>
<td>0.01 mg/L</td>
</tr>
</tbody>
</table>

- All district wells are below the MCLs for these contaminants.

Mitigation
1. Prevent the percolation of contaminants from the silt disposal areas by lining the disposal areas with a clay layer prior to disposal taking place.
2. Perform a lab analysis to determine the amount of contamination in mg/L that would occur from runoff from the silt pile prior to finalizing the disposal site selection.
3. Should contamination be found to be evident, provide funding for treatment facilities for both VRCWD and MOWD.

Concern 3
Silt disposal piles will be impermeable and will eliminate the percolation of rainwater into the aquifer in the areas of silt disposal. With the MODA-1 (27 acres) and BRDA (50 acres) there will be 77 acres of area lost to percolation. The average annual volume of percolated water into our aquifer from these 77 acres is about 77 acre-feet. Seventy seven acre-feet is 30 days of our normal winter time demand and 15 days of our summer time demand. Of these 77 acre feet of lost water part of it will flow to the ocean and part will percolate into lower sub-basins and be recovered by the City of Ventura wells which would reduce Ventura’s demand for Casitas water.

The loss of these annual 77 acre feet will increase VRCWD’s cost to provide water because we will have to purchase 77 more acre feet of Casitas water and VRCWD would be more reliant on water from Lake Casitas to make up the difference, placing a greater burden on CMWD to supply water during drought years.

Conclusion
Without guaranties our water supply will not be compromised and our costs will not increase, we cannot agree to any proposals to dispose of silt in the BRDA and MODA sites.

Respectively,

Matthew L. Bryant
General Manager
Figure 1. Conceptual Modifications to the Disposal Site Upstream of Baldwin Road and to Revetments.