

Edmonson, Jim

Southern California Manager
California Trout

1. The Corps differs to the National Marine Fisheries Service as the expert in assessing the significance of the proposed restoration alternative on the Southern California ESU. Per the comment letter received from NMFS (see McInnis comment letter, last paragraph), the proposed restoration could “contribute significantly to the endangered Southern California steelhead ESU”.

Goad, Matthew

Ranch Manager
Scanstyle USA, INC

1. The 4-foot rise in the Casitas levee will have an insignificant effect on the hydraulic properties in this reach. With the higher levee, it is estimated that the 100-yr flood will be approximately 0.1 foot higher with the higher levee than with the existing levee. The velocities only increase approximately 2 %. These increases are not considered significant and will not alter the flood risk or bank erosion in this area. The small difference is because the current levee blocks practically all the flow from entering the town of Casitas. There is only a small amount of spill over the top of the levee expected. Therefore, blocking the entire flow will not significantly change the local hydraulics through this area.
2. In the detailed phase, further flood study will be conducted in this reach. Appropriate mitigation will be designed if further work shows that project impacts will increase flood risk

Grader, Zeke

Executive Director
Institute of Fisheries Resources

1. The deconstruction of Matilija Dam will be an engineering endeavor. As such, the alternatives necessarily focus on the engineering aspects of deconstruction. Much of the ecosystem is expected to “heal” itself once the dam is removed. Except for the Arundo removal aspect of the proposed restoration alternative, the Environmental Working Group did not feel a need to propose any extensive restoration measures, but rather allow natural fluvial processes to remove the dam-sequestered sediment naturally.

3. Concur. Mitigation measure CR-2 has been revised to require that historical architectural and NRHP evaluation will be completed for Matilija Dam, Camino Cielo (Ojala) and Soper's Ranch.
4. See response to Comment 1.
5. See response to Comment 2.
6. See response to Comment 3.
7. Mitigation measures for this project will be developed in accordance with Section 106 of the National Historic Preservation Act (36 CFR 800). The County would be involved in these discussions as part. CR-2 explains this process.
8. Concur. These two County documents would be reviewed in development of mitigation measures.
9. Concur. The Cultural Heritage Board would be a concurring party to the Section 106 memorandum of Agreement that is developed to detail mitigation measures.
10. The Final EIS/EIR will be made available for public review prior to signature of the Record of Decision.

Howell, F.A. (Rick)

Property Owner

1. See GR-C.

Hysore, John

Property Owner

1. This feasibility study is not considering the removal of Casitas Dam. The recommended plan is to provide ecosystem restoration in the Ventura River Watershed, which also includes the removal of Matilija Dam. Alternative analyses considered various options to dam removal. Impacts to infiltration rates and to local infrastructure were also considered in the analyses.

Jackson, Hannah-Beth

Assemblymember, 35th District
Chair, Natural Resources Committee
California Assembly

1. The California Coastal Sediment Management Plan was added to the list of plans with beach replenishment goals that the proposed restoration plan might assist in achieving those goals. See revision for section 5.10.3.

Jenkin, A. Paul

Coordinator, Matilija Coalition
Surfrider Foundation

1. See GR-N.

and Matilija Lake was assessed but was not carried forward as described in the Main Report, Chapter 3, in the section "Formulation of Measures and Alternative Plans".

3. During the next phase of work where additional modeling and a more detailed design will be performed, properties at risk will be further assessed to confirm the necessity of acquirement or whether other options are viable. Coordination with homeowners, including on-site visits and surveys will be pursued as part of this next level of effort.

Knuth, Al

Property Owner

1. See GR-K.
2. See GR-R.
3. The recommended plan is the least expensive alternative and also provides the greatest environmental benefits. Please refer to Main Report. Regarding other dam removal options, earlier formulation iterations dismissed the gradual enlargement of the notch as this action would compromise the structural integrity of the arch dam, especially considering seismic and larger flow events.

Kruse, Suzanne

Property Owner

1. See GR-Q1.

Lalani, Nazir

Deputy Director

County of Ventura Public Works Agency

Traffic, Advance Planning, and Permits Division

1. The Matilija Dam Ecosystem Restoration Project is not anticipated to result in significant access restrictions to residents along Matilija Canyon Road. The Transportation Management Plan described in Mitigation Measure T-1 would include measures to ensure that emergency access to Matilija Canyon Road residents remains available at all times during project activities. Additionally, the project would not contribute to washouts of Matilija Canyon Road and would likely reduce the danger of washouts during storm events. The Recommended Plan (Alternative 4b) includes the construction of a new channel through the area of the existing reservoir behind Matilija Dam. This channel alignment generally runs through the middle of this portion of Matilija Canyon and would not be located adjacent to Matilija Canyon Road (see Figure 3.6-3 in the EIS/EIR). In fact, through much of this area the proposed channel alignment would direct creek flows further away from Matilija Canyon Road than current conditions. The channel would be stabilized by a soil cement revetment seven feet above the

channel invert and five feet below the invert. For these reasons, implementation of the Recommended Plan would actually help protect the roadway from flood damage in the vicinity of the Matilija reservoir by: (1) directing flows through at stabilized channel; (2) establishing a large buffer area between the channel and the roadway; and (3) constructing stable, engineered fill embankments along each side of the channel which would further protect Matilija Canyon Road.

2. Following are responses to the items listed in the comment regarding the proposed Camino Cielo Bridge removal and Santa Ana Road Bridge replacement:

- Estimated costs for removal of the Camino Cielo Bridge and replacement of the Santa Ana Road Bridge are presented in the Feasibility Study. These costs would be shared by the Corps of Engineers and the County of Ventura Public Works Agency.
 - The new Santa Ana Road Bridge and all proposed flood protection structures, such as the proposed Camino Cielo floodwall, would be designed to Corps, VCWPD, and FEMA standards, as applicable.
 - The Recommended Plan includes the removal of the Camino Cielo Bridge, ~~but does not include construction of a new bridge~~. The proposed Santa Ana Road Bridge would be designed to meet all applicable standards, including those of the AASHTO and Ventura County.
 - Under the Recommended Plan, the Camino Cielo Bridge will be removed and a new bridge will be constructed downstream of the existing structure. The new bridge will allow for greater stream flow capacities to pass beneath the structure, while continuing to provide access to Camino Cielo residences. During construction of the new bridge, the existing structure will provide interim normal ingress/egress use. After completion of the new bridge, the existing Camino Cielo bridge will be removed and the original channel width at the current location will be restored. The detailed design of the new bridge will be completed during the Pre-construction Engineering and Design (PED) phase of the project
 - Right-of-way requirements for the Santa Ana Road Bridge are discussed in the Feasibility Study and will be refined during the design phase of the project.
3. The impacts of the temporary trips generated during construction are discussed in section 5.9 of the Draft EIS/EIR, including the transport of concrete rubble to Hanson Aggregates and non-recyclable debris Toland Road Landfill. The responses to the following comments (below) address the specific comments related to the proposed project's site-specific and cumulative effects.
4. Based on Ventura County Level of Service standards, which have been adopted as transportation significance criteria, the EIS/EIR discloses that the project would result in significant unmitigable impacts. Although impacts would not be mitigable to less-than-significant levels, Mitigation Measure T-1 (preparation of a Transportation Management Plan [TMP]) is recommended to reduce impacts to the extent feasible. The TMP would need to provide measures acceptable to the Transportation Department for any impacts the project would have on the County local roads and network systems, including those to North Matilija Road, South

**MATILIJIA DAM ECOSYSTEM RESTORATION FEASIBILITY STUDY
FINAL EIS/EIR ERRATA**

Changes to the FEIS/EIR:

Global: search and replace “turbidly” with “turbidity.” It occurs several times in the text.

Page 2-9. Revision to Page 5.2-9 add a “t” to the end of “Ojai Valley Sanitary District Treatment Plant”.

Page 2-11 Revised text second paragraph. “aggradational” is misspelled.

Page 2-17 Revised text in response to Page 5.11-3 has an incomplete sentence as revised.

Page 4-7 GR-D2 General Response. Last paragraph on the page.

Revise second sentence to ...the two new wells are intended as mitigation...

Revise the first sentence to state “The groundwater extracted from the wells is expected to be no more than the amount of surface water the City would divert from the Ventura River to offset the loss of diversion resulting from....turbidity.”

Page 4-10 GR-L Slurryline. Second sentence change to “The alignment of the slurryline will follow a constructed maintenance road that may be partially converted to a recreation trail....”

Page 4-13 GR-P5. Second paragraph first sentence revise to “In addition to evaporation, water loss occurs through transpiration of vegetation on the Matilija Lake delta.”

Page 4-15 GR-W. Mid paragraph replace the word “routing” with “routine.”

Page 4-31. Jenkin letter Response Number 6 is changed to reference general comment GR-D1 and GR-p6.

Change response to comment number 9 to “See response to #8 above. If at the end of 10 years performance criteria are not met, the additional monitoring would be necessary. As the project proceeds, projections into costs and maintenance needs to meet performance criteria will be reevaluated often and changes to the monitoring and maintenance would be made as needed.”

Page 4-40. Comment response number 1, middle of first paragraph, change “meaning” to “meaningful.”

Page 4-45. James Word comment response number 3. Change “dew” to “drew.”

Page 4-47. Wydzga comment number 2. Change first sentence to read “The term “natural” is used in the context that is the opposite...”

K:\WQ\Environmental Services\Flood Control Projects\Matilija Dam\CEQA\ERRC\FEISEIRdocchanges.DOC

5. Comments and Responses per Ventura County's Environmental Report Review Committee (ERRC) Process

The County of Ventura has written and adopted an Administrative Supplement to the State CEQA Guidelines for the implementation of the California Environmental Quality Act. The Supplement states that all draft Environmental Impact Reports (EIRs) for both public and private projects must be reviewed for technical adequacy by the Environmental Report Review Committee. This committee comprises interagency staff whose primary purpose is to receive public input on EIRs, to evaluate the technical adequacy of EIRs, and to make advisory determinations as to whether the final EIR is technically adequate and has been completed in compliance with CEQA.

The membership of ERRC includes the Resource Management Agency (RMA) Deputy Director, Planning Division; RMA Deputy Director, Environmental Health Division; Executive Officer, Air Pollution Control District; Agricultural Commissioner; Public Works Agency Director; and Fire Marshall, Fire Protection District. The ERRC Chairman is selected by majority vote of the Committee members and presides over the hearings.

The ERRC reviewed the draft EIR and responses to comments received during the public review period per CEQA. A public hearing was scheduled by the ERRC to review the adequacy of the EIR and responses and hear public testimony specifically regarding the technical adequacy of the document. If ERRC determines that the document is technically adequate, it recommends that the Board of Supervisors certify the document at a subsequent public hearing. The ERRC decisions may be appealed to the Board of Supervisors.

The Matilija Dam Ecosystem Restoration Feasibility Study EIS/EIR ERRC hearing was held on October 13, 2004 and continued to October 20, 2004 so that comments received October 13th could be adequately addressed. (The Public Meeting notice is included in this section.)

Comments received during the ERRC process are presented in this section. Also included are the Responses to testimony that were provided on October 20, 2004 via written memorandum to Mr. Bruce Smith, Chair, and oral presentation to the ERRC. Those written responses are included this section as part of the CEQA record.



PUBLIC MEETING NOTICE

FOR THE
MATILIJDA DAM ECOSYSTEM RESTORATION FEASIBILITY STUDY

What's Being Done?

The Ventura County Watershed Protection District (District), in partnership with the U.S. Army Corps of Engineers (Corps), has prepared an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Matilija Dam Ecosystem Restoration Feasibility Study, which proposes to remove Matilija Dam and the accumulated sediment. Removal of Matilija Dam would eliminate a barrier to fish passage on Matilija Creek and facilitate the migration, spawning, and rearing of endangered southern steelhead. Accumulated sediment would be removed or re-configured to improve the Matilija Creek flow regime and ultimately restore Matilija Creek and the Ventura River to a more natural streambed configuration, and provide for beach sand nourishment. Additional project components would provide opportunities for recreation, flood protection, and riparian habitat restoration.

The EIS/EIR addresses potentially adverse impacts to earth resources, hydrology and water resources, biological resources, cultural resources, aesthetics, air quality, noise, transportation, and recreation. The District, as lead agency under the California Environmental Quality Act, will act on the EIR. The Corps, as lead agency under the National Environmental Policy Act (NEPA), will act separately on the EIS.

Public Review

A 45-day public review period for the Draft EIS/EIR was held from July 16, 2004 through August 30, 2004, during which time public comments were received. Comments have been addressed and the document modified where appropriate. The proposed Final EIS/EIR is available for review at the following locations:

- | | | |
|-----------------------------------|---|--------------|
| 1. Ventura County Clerk | 800 S. Victoria Ave. | Ventura |
| 2. Watershed Protection District* | 800 S. Victoria Ave. | Ventura |
| 3. Meiners Oaks Library | 114 N. Padre Juan Ave | Meiners Oaks |
| 4. Ojai Library | 111 E. Ojai Ave. | Ojai |
| 5. Avenue Library | 606 N. Ventura Ave. | Ventura |
| 6. E.P. Foster Library | 651 E. Main | Ventura |
| 7. Matilija Dam Website | http://www.matilijadam.org/ | |

*Also available at the District are CD versions for public distribution.

How Can You Participate?

As required by the Ventura County Administrative Supplement to the State CEQA Guidelines, an Environmental Report Review Committee (ERRC) public meeting will be held to evaluate the technical adequacy of the proposed Final EIS/EIR. You are invited to attend this public meeting on Wednesday, October 13, 2004 at 1:30 pm in the Board of Supervisors' Hearing Room, Ventura County Government Center, Hall of Administration, 800 South Victoria Avenue, Ventura.

Please note that the purpose of this meeting is to evaluate the technical adequacy of the proposed Final EIS/EIR in relation to CEQA. The discussion will focus on the analyses of the project's environmental effects subject to CEQA. Comments on whether to approve or deny the proposed project will not be accepted at this hearing, but will be appropriate at the subsequent public hearing by the District Board of Supervisors that will be held at a later date, likely in December 2004.

Questions?

For more information, you may contact Pam Lindsey, Watershed Ecologist, at 805-654-2036.



Ventura County
Air Pollution
Control District

669 County Square Dr
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Michael Villegas
Air Pollution Control Officer

August 30, 2004

Via email: jonathon.vivanti@usace.army.mil

Mr. Jon Vivanti
US Army Corps of Engineers
915 Wilshire Blvd.
Los Angeles, CA 90017-3401

VENTURA COUNTY	
ENVIRONMENTAL REPORT REVIEW COMMITTEE	
CASE NO.	Matilija
EXHIBIT	1
DATE	10/13/04

Subject: Request for Review of Matilija Dam Ecosystem Restoration Feasibility Study, Ventura County, US Army Corps of Engineers (USACE)

Dear Mr. Vivanti:

Thank you for the opportunity to comment on this important project. We have reviewed the subject project draft environmental impact statement/report, which is for a proposal to remove the Matilija Dam and accumulated sediment. Removal of the Matilija Dam would eliminate a barrier to fish passage on Matilija Creek and facilitate the migration, spawning, and rearing of endangered southern steelhead. Accumulated sediment would be removed or re-configured to improve the Matilija Creek flow regime and ultimately restore Matilija Creek and the Ventura River to a more natural streambed configuration.

The project is located Northwest of the unincorporated Meiners Oaks community on Ventura County, just over one-half mile from the Matilija Creek confluence with the Ventura River. The study area includes approximately 2,000 acres along the Matilija Creek and the Ventura River mainstem, encompassing unincorporated areas of western Ventura County, the Cities of Ojai and Ventura, and the Los Padres National Forest.

General Comments

The Air Quality discussion, Section 5.6, addresses potential air quality impacts from the different project alternatives. This section did not address the project's potential significance with respect to the new federal eight-hour standard and the California one-hour standard. While the 1995 Ventura County Air Quality Management Plan concludes that the federal one-hour standard would be met by 2005, it should be noted that the federal one-hour standard is being replaced by an eight-hour standard. Ventura County has been officially designated a moderate nonattainment area for this standard, hence the project's significance conclusion also should be analyzed with respect to the new eight-hour standard. Ventura County, including the Ojai Valley, also frequently exceeds the California air quality standards for ozone. Based on estimates of project NOx emissions, the county's nonattainment status with respect to the new federal eight-hour ozone standard and California one-hour ozone standard, all project alternatives will likely have a significant adverse and unmitigable impact on air quality in Ventura County.

General Conformity

Page 5.6-4 contains a discussion on General Conformity. This discussion concludes that a comprehensive Air Quality Conformity Analysis will not be required because sufficient NOx offsets would be obtainable to fully mitigate project NOx emissions during all project years with emissions greater than 25 tons per year. This conclusion is not substantiated because such offsets have not been obtained nor has evidence been presented that offsets are available and obtainable. It is therefore possible that a full conformity analysis for this project will be required.

2

If you have any questions, please call me at (805) 645-1426 or email me at alicia@vcapcd.org.

Sincerely,

/s/

Alicia Stratton,
Planning and Monitoring Division

*Meiners Oaks County
Water District*

202 W. El Roblar Dr.
Ojai, CA 93023
(805) 646-2114

October 13, 2004

VC ERRL
Board of Supervisors
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009

VENTURA COUNTY	
ENVIRONMENTAL REPORT REVIEW COMMITTEE	
CASE NO.	<i>Matilija</i>
EXHIBIT	<i>A</i>
DATE	<i>10/13/04</i>

**Re: MATILIJA DAM REMOVAL METHODOLOGY; IMPACT ON
WELLS OPERATED BY MEINERS OAKS COUNTY WATER DISTRICT**

This letter is written to inform your Board that the Meiners Oaks County Water District owns and operates two wells, which are located in the Ventura River below the Matilija Dam.

We are in the process of obtaining an expert opinion on the proposed methodology to be used in removal of the Matilija Dam and its potential adverse effects on our wells.

As soon as the expert study is completed, we will submit our findings and may further petition the Board for appropriate action.

1

Very Truly Yours,



DAVID DUVARNEY
General Manager,
Meiners Oaks County Water District

James B. Ruch **900 Boardman Road, Ojai, CA 93023** **(805) 646-7796**

October 13, 2004

Mr. Jeff Pratt
Director
Ventura County Watershed Protection District
800 S. Victoria Ave.
Ventura, CA 93009

VENTURA COUNTY
ENVIRONMENTAL REPORT REVIEW COMMITTEE
CASE NO. <u>Matilija</u>
EXHIBIT <u>B</u>
DATE <u>10/13/04</u>

Re: Matilija Dam Removal EIS/EIR and Final Report

Dear Jeff,

The Ojai Water Conservation District and the Ojai Basin Groundwater Management Agency have both expressed concern about the loss of water rights and the potential loss of water supply from Casitas Municipal Water District that could occur as a result of the Matilija Dam removal project. These agencies support the current discussions between Ventura County and Casitas directed toward a resolution of this issue, however, as has been pointed out to you in a letter from Russell McGlothlin dated October 6, there are additional stakeholders in the Ojai Valley, including these two agencies, who must be considered and consulted. Hopefully a meeting with all these stakeholders will be held as soon as possible. We are concerned that these meetings and discussions, and an appropriate resolution of these issues did not occur prior to the publication of the "Final Report" on the project.

1

In response for your immediate request regarding "technical inadequacies" in the EIS/EIR, I have the following comments.

In the "response to comments" section, under the heading GR-P Water Supply, subsection GR-P1 Loss of Dam, it is stated that "The Matilija Dam Ecosystem Restoration Project proposes to replace the water supply loss resulting from the dam's removal prior to its obsolescence date. Therefore, the removal of the Matilija Dam Diversion and the elimination of the diminishing storage volume will not result in a loss of supply." This section also goes on to state that the project proposes that the Matilija water rights license be retained by Casitas in perpetuity.

2

This is a good and positive response, however the commitment to replacing the water supply loss as a result of dam removal is not specifically stated anywhere in either the revised final EIS or in the Project Final Report. Nor does it appear anywhere in the proposed mitigation actions for the project. In fact, the only reference to making up lost water supplies which appeared in the draft EIS appears to have been stricken from the final EIS under the revisions to Page 5.2.9, Groundwater and Surface water Supplies on page 2-10 of the Changes to the Draft EIS/EIR document. Until this is corrected, and the commitment expressed in the Response to Comments is incorporated in the Final EIS/EIR and the Final Report, we believe that the documents are technically inadequate.

There is also a significant issue regarding the amount of water stored behind Matilija Dam. There are several differing references to the amount historically and currently in storage. There are also differing statements regarding the present and future water yield from the dam. What is wrong with these amounts is that they all refer to the open water behind the dam without any reference to the very significant amount of water stored in the sediments behind the dam. Since underground storage of water was one of the original purposes of the Matilija Project, originally as water delivered by gravity flow to the Ojai Valley for such storage in that basin, it should have occurred to the project proponents to measure and consider the amount of water annually stored and available for release into the Ventura River from the sediments behind the dam. This amount of water must be considered in assuring that the full right to Matilija Water be transferred in perpetuity to Casitas, and made up in terms of lost water supply as part of the Matilija Dam Ecosystem Restoration Project. We believe that this is a technical inadequacy in the EIS/EIR and Final Report, which must be corrected.

3

In summary, we appreciate the intent expressed in the Response to Public Comments, and the efforts your agency is making to include all parties in making sure that those who depend upon the water supply from Matilija/Casitas are, "Made Whole" as part of the project. But, we believe it is mandatory that that intent be specifically stated in the EIS/EIR and in the Final Report.

Sincerely,

James B. Ruch

Copies To: U.S. Army Corps of Engineers
Ventura County Supervisor Steve Bennett
Ojai Groundwater Basin Management Agency
Ojai Water Conservation District
Casitas Municipal Water District
Russell McGlothlin

ARNOLD, BLEUEL, LAROCHELLE,
MATHEWS & ZIRBEL, LLP

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October 13, 2004

Environmental Report Review Committee
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009

VENTURA COUNTY	
ENVIRONMENTAL REPORT REVIEW COMMITTEE	
CASE NO.	<u>Matilija</u>
EXHIBIT	<u>C</u>
DATE	<u>10-13-04</u>

**Re: Matilija Dam Ecosystem Restoration Feasibility Study
Final Environmental Impact Statement/Environmental Impact Report
(September 2004) Comments by Ojai Valley Sanitary District**

This letter is written on behalf of the Ojai Valley Sanitary District ("OVSD"). OVSD owns and operates the Ojai Valley Wastewater Treatment Plant ("OVSD Plant"), which discharges tertiary treated wastewater to the Ventura River. The OVSD Plant is located at 6363 North Ventura Avenue, Ventura. It is adjacent to the Ventura River. It is protected from a 100 year flood event by an existing levy which is required pursuant to federal, state and local laws, regulations and permits.

OVSD seeks assurance that the Matilija Dam Project ("Project") will not increase the possibility of storm water damage to the OVSD Plant and OVSD facilities, including collection main lines which run near the existing 100 year floodplain.

Damage to the OVSD Plant or its collection system pipelines would have obvious environmental consequences. The OVSD Plant collects and treats wastewater from the City of Ojai and surrounding unincorporated communities including Meiners Oaks, Mira Monte, Oakview, Live Oak Acres, Casitas Springs, Foster Park, and a portion of the North Ventura Avenue area of the City of Ventura. OVSD serves an estimated population of 23,000 people. The Plant has a dry weather design capacity of 3,000,000 gallons per day. It is currently operating at an average of approximately 2,000,000 gallons per day.

The U.S. Environmental Protection Agency ("EPA") and the Regional Water Quality Control Board-Los Angeles Region ("RWQCB") have classified discharge from the OVSD Plant as a major discharge. It has a threat to water quality and complexity rating of A-1 pursuant to federal law. In order to meet the stringent requirements of federal and state law, and to address

Environmental Committee
 October 13, 2004
 Page 2

the strong environmental concerns of its constituents, OVSD has completed Thirty Five Million Dollars worth of public improvements to provide for a state of the art wastewater treatment facility providing tertiary treatment with ultra-violet disinfection.

If the OVSD Plant or pipelines were inundated or damaged by storm flows, untreated waste water would be discharged to the Ventura River, with obvious detrimental environmental and public health consequences. Both the National and National Environmental Quality Act ("NEPA") and the California Environmental Quality Act ("CEQA") require consideration and discussion of direct and indirect significant effects of the project on the environment, including relevant specifics of physical changes and alterations to the landscape, health and safety problems caused by physical damage, and other aspects of the resource base such as public services.

The Project referenced Environmental Impact Statement ("EIS/EIR") did not identify the OVSD Plant in its discussion of land use, did not identify the potential environmental consequences of storm water inundation of the OVSD Plant or facilities, and did not provide mitigation measures to address potential environmental impacts. Although the Final EIS/EIR now mentions the Plant, we are still concerned with the adequacy of the evaluation.

The EIS/EIR and its related feasibility study do provide calculations and criteria for flood control protection which indicate that additional flood control protection may be required as a result of the Matilija Dam Project. These findings are discussed in OVSD's August 24, 2004 comment letter which is attached. The response to this comment, found in the September 2004 Final EIS, (excerpt attached) simply provides that additional analysis will be performed to assess necessary flood protection at the OVSD plant at a later phase of the project.

1

We recognize that a project as complex as this will have to be managed in a way that adapts to additional information that becomes available as the final design work is completed. Accordingly, rather than demanding specific improvements or mitigation measures, we suggest that an additional mitigation measure be adopted which generally provides that the final Project, as constructed, include improvements necessary to provide the required 100 year flood event protection to the OVSD Plant and pipelines. This approach allows for further evaluation, but makes it clear that this important public facility must be protected.

2

We propose the following mitigation language:

"Mitigation Measure F-1, The Project shall protect the Ojai Valley Wastewater Treatment Plant and associated Ojai Valley Sanitary District Wastewater Collection Facilities from flood inundation which would occur as a result of the Project to the same degree, and consistent with the same criteria, as provided by the Project to other affected facilities and residential communities."

Environmental Committee
October 13, 2004
Page 3

Thank you for your consideration

Very Truly Yours,

ARNOLD, BLEUEL, LAROCHELLE,
MATHEWS & ZIRBEL, LLP



Mark A. Zirbel

MAZ:ma
Enc.



OJAI VALLEY SANITARY DISTRICT

A Public Agency

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(805) 646-5548 • FAX (805) 640-0842
www.ojaisan.org

August 24, 2004

Jon Vivanti, US Army Corps of Engineers
915 Wilshire Blvd.
Los Angeles, CA 90017-3401

MATILIJA DAM REMOVAL PROJECT EIR, PROJECT REPORT & TECHNICAL APPENDICES

I have reviewed the Matilija Dam Removal Project EIR, Project Report and Technical Appendices. This is a very large and complex document but there are many inconsistencies and errors to be dealt with. In general the documents show a lack of concern for the Ojai Valley Sanitary District's facilities. The impacts of the project will put many of our sewer pipelines and our wastewater treatment plant at risk, which in turn puts the environment at risk. We all can understand that if a sewer line is exposed by a flood and breaks that there will be contaminated water everywhere and an environmental disaster. If our wastewater treatment plant is flooded it will be shut down with millions of gallons of sewage following through it untreated and discharged into the Ventura River causing an environmental disaster.

I request that you seriously review and reevaluate the impacts of the project on the sanitary sewer facilities along the Ventura River. My comments follow:

- 1 The EIR includes Canada Larga levee but it is not in Project Report. The Canada Larga levee and floodwall appear to have been included in the project earlier and then eliminated. But, the elimination was incomplete; it still appears in the EIR. This levee is a significant issue to the Sanitary District since the project will place our Wastewater Treatment plant at risk. The same criteria used in the flood protection on other areas should apply here.

1

That criteria is found on page 3-47 of the project Report and can be summarized as follows: The "high level" flood protection, necessary for Alternate 4b, is established by determining the 100 year flood water surface elevation of the river channel based upon the maximum aggradation predicted during a 50 year simulation of the natural erosion, Alternate 2b - worst case downstream aggradation, and adding 8 feet of freeboard in the reaches downstream of Baldwin Road to account for uncertainties.

After carefully reviewing the documents, I found that the river channel thalweg will rise by about 1.25 feet in the 50 years on the H & H report figure 19-139. If the hydraulic modeling found in Exhibit B6 of the same report uses that thalweg, then the water surface to use is 201.16 at RM 5.11. The flood protection criterion then adds 8 feet to that resulting in a levee or floodwall elevation of 209.16. The elevation of the top of the wall/curb around the wastewater treatment plant at RM 5.11 is 205.01.

1
(cont.)

The Matilija Dam Removal Project is having an impact on the wastewater treatment plant and that the flood protection criteria should be applied to it. A public health and safety facility should be more carefully evaluated in this study than it was. Flooding of the wastewater treatment plant could result in millions of gallons of raw and partially treated sewage being discharged into the river and the resulting environmental disaster.

2. Project Report and EIR used old data.

The documents refer to a 303d list which includes DDT, copper, silver, zinc, selenium, algae (eutrophication) and trash. The current 303d list includes only algae. Use the current list.

2

The references to the Draft State of the Watershed Report from the LA Regional Water Quality Control Board are a few months older than the Final State of the Watershed Report. Use the actual published report rather than a draft.

3. The result of deposition of material from the dam into the Ventura River in the manner proposed results in widening of the floodplains. There are sanitary sewers along the edge of the Ventura River. These were installed in the early 60's and were outside the 100 year floodplains. The widening of the floodplains by the project will place these lines within the floodplain and place them at risk of damage due to erosion and inflows. The deposition of material should be placed to protect banks and sewer facilities from erosion and not to widen the floodplains or the sewer lines should be relocated as elements of the Project. Flooding damage to the pipelines can cause major environmental damage to the river, the fish in it, and the beaches. It would also be a threat to the City of Ventura's water supply.

3

4. Although not the direct concern of the Sanitary District, the hydrology report seems to have been prepared in a "drive by" mode without a site visit. When evaluating our facilities, I investigate the applicable floodplain information; the hydrology study does not fit the conditions I have observed on the ground. The Ojai Burn Dump is an island in many storms, with water around all sides of it, yet the study has it not being an island in the 50, 100, or 500 year floodplains. The FEMA FIRM shows the Burn Dump as an island. Another spot of concern is along Burnham Road where the project floodplain will widen to include sewer lines and the public road.

4

This matter is of concern because if you assume the water stays in the channel rather than spreading out, did you error in the water surface calculation downstream or was some needed flood protection omitted?

4
(cont.)

Some areas that look as though they do not match the actual conditions are: RM 5.9, RM 7.7 to 8.1 and RM 11.3 to 11.7.

5. In this introductory section of both the project report and EIR, much material was copied from the State of the Watershed Report, but a section of the River, the Lower Ventura River, was omitted. I found myself looking for the lower Ventura River section, because that is a common designation, and could not find it and did find a paragraph in the Upper Ventura River section on Casitas Springs, which is in the Lower River section. Later in the EIR you clearly define the river into reaches and should identify what reach or reaches is identified with your terminology. I think reach 2, 2a and 2b together, is the lower river. In the Project Report Introduction the river reaches are identified in Table 1-1 and these designations should have been followed.

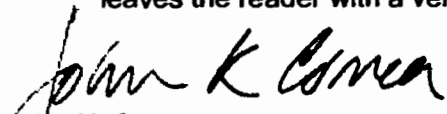
5

This problem appears later in the Flood Hazards section of Chapter 5 beginning on page 5-2.7. You identify Reach 6 correctly and then on page 5-2.8, identify Reach 5 incorrectly. This causes a lot of confusion. It appeared that you were setting up to run down the flooding issues on a reach by reach basis. This would have been a good idea.

Once again on page 5-2.9, in the second to last paragraph of the Flood Hazards section, you list the items included in the Canada Larga area and omit the wastewater treatment plant. The Wastewater treatment plant and the sewer pipelines along the river seem to have been overlooked altogether. Flooding damage to the plant or pipelines can cause major environmental damage to the river, the animals and fish in it, and the beaches. It would also be a threat to the City of Ventura's water supply

6. In copying material from the State of the Watershed Report, you have not copied a complete section and the reader is left to draw an incorrect conclusion. The Lower Ventura River Groundwater section as copied from the State of the Watershed Report omits the last sentence of the paragraph. This leaves the reader with the impression that the wastewater treatment plant discharge is the source of the poor quality water. This is false. The deleted sentence reads, "Sources of the degradation have included oil field work, including discharges of brines into the river, unlined sumps and poor quality recharge from Canada Larga..." This leaves the reader with a very different impression.

6


John K. Correa
General Manager

Bryant, Matthew L. (Letter #2)

General Manager
Ventura River County Water District

The use of tertiary reclaimed water was considered but would only be acceptable if it was treated by reverse osmosis. This additional level of treatment would be too costly, and therefore this measure was dismissed from further evaluation.

Conrow, Jerry L.

President, Ojai Water Conservation District
President, Ojai Basin Groundwater Management Agency

See GR-P1 and GR-P2.

2. Please refer to Economics Appendix in Technical Appendices volume. Expected damages are based probabilities of occurrence.
3. Comment noted.
4. Figure 2-2 is based on the current Ventura County General Plan, including designations and definitions.

Correa, John K.

General Manager
Ojai Valley Sanitary District

Additional risk and uncertainty analyses will be performed at the next phase of the project (detailed design work) to assess necessary flood protection at the Ojai Valley Sanitation District Waste Treatment Facility.

2. EIS/R will be revised with the current 303d list. Reference to Final State of the Watershed Report will be made.
3. Bank protection and/or floodproofing to protect infrastructure will be assessed and incorporated as needed in the detailed design phase.
4. The purpose of the flood mapping was to compare the alternatives and has no bearing on the FEMA floodplain mapping. At all locations where the project was deemed to significantly raise flood elevations, a detailed analysis was performed. At RM 5.9, Casitas Vista Road is lower than the surrounding floodplain and could transmit water further downstream. No significant aggradation was expected at this location and therefore the with-project condition will be similar to the existing condition. However, additional survey work will verify if the project could worsen the flood damages at this location or locations downstream. At RM 7.7 to 8.1, mapping along San Antonio Creek was not performed because that is outside of the project area. The modeling shows that the project will not affect the flood elevations along the tributaries of the Ventura River. Under with project conditions, the Casitas Levee will be connected to the stable terrace. At RM 9.3, just downstream of Santa Ana Blvd two OVSD structures housing sewer pump facilities were located in the 100-yr according to the feasibility study. OVSD stated that these should not be in 100-yr floodplain and that floors of the

structures were elevated. Future flood maps will reflect that these structures are elevated. Future surveys will determine if additional flood protection is required at this location. At 11.3 to 11.7, the levee along the Burn Dump was assumed functional, but subsequent site visits showed that it was not. Future floodmaps will show this area as being flooded during the 100-yr flood. Any additional flooding at this location will be mitigated.

5. The reach descriptions have been updated in Section 5 of the EIS/EIR. The wastewater treatment plant has been added to the list of developments in the Cañada Larga area.
6. Concur. Sentence will be added to text as stated.

Davis, Don

Utilities Manager
City of San Buenaventura

Modeling analysis performed is considered sufficient. Confirmation however will occur during the detailed design phase.

2. Comment noted.

De Silva, Yolanda

Property Owner

1. The removal of the dam provides a watershed-wide opportunity for ecosystem restoration.
2. The dam has outlived its period of useful service. It currently provides a diminished water supply capability, and will cease to do so when the remnant lake is completely filled with sediment – estimated by approximately year 2020. A single large storm event could effectively fill in the remaining capacity even sooner. In its current state, the dam provides very little flood protection. To protect against flooding as a result of the removal of the dam, levee and bridge modifications are included as measures of the preferred plan recommended by this feasibility study.
3. The intent of this project is not impact water supply and water quality, while benefiting steelhead trout and native habitats of the watershed.

Dilks, Eric M.

Property Owner

1. Confirm that additional detail will be included during design phase.
2. Confirmation hydraulic modeling will be conducted in design phase.

1

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: TROY WHITTEKER

Address: 946 DEVEREAUX DR
OJAI CA 93023

Phone No. 805-646-4054

Organization: MEINERS OAKS WATER DISTRICT

Agenda Subject/Item Number: _____

This information will be entered in the official minutes.

2

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: JIM RUCH (RUGSH)

Address: 900 BOARDMAN RD.
OJAI CA 93023

Phone No. (805) 646-7796

Organization: OJAI WATER CONSERVATION DISTRICT + OBGMA

Agenda Subject/Item Number: 2

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SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: MARK ZIRBEL

Address: 300 Esplanade
General

Phone No. 988 7886

Organization: OJAI VALLEY SAN DIST

Agenda Subject/Item Number: MULTI

This Information will be entered in the official minutes.

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: John Correa

Address: 1072 Tico Rd
Ojai

Phone No. 646-5548

Organization: Ojai Valley Sanitary District

Agenda Subject/Item Number: _____

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5

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: MATT BRYANT

Address: 409 OLD BALDWIN Rd

Phone No. (805) 646-3403

Organization: VENTURA RIVER COUNTY WATER DISTRICT

Agenda Subject/Item Number: REMOVAL OF MATILJA DAM / #2

This Information will be entered in the official minutes.

6

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: Harbhajan S. Thind

Address: 2593 Wetmore Drive

Deer Park, Calif. 91010

Phone No. 626-357-4921

Organization: Propertyowner - Meiner Oaks

Agenda Subject/Item Number: General

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7

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: NORM DAVIS

Address: 412 N. Rice Rd

Phone No. 805-646-9734

Organization: MEMBER MEINERS OAKS WATER DISTRICT - WELLS

Agenda Subject/Item Number: (2) Matilija Dam

This Information will be entered in the official minutes.

8

SPEAKER CARD

If you wish to address
THE COUNTY OF VENTURA
ENVIRONMENTAL REPORT REVIEW COMMITTEE,
please complete this card and give it to the Secretary.

Name: JOHN DUNCAN

Address: 8832 NYE A.D.
CASITAS SPRINGS

Phone No. 649-3087

Organization: Self

Agenda Subject/Item Number: Dam Removal

This Information will be entered in the official minutes.

**ENVIRONMENTAL REPORT REVIEW COMMITTEE
STATEMENT CARD**

Please complete this card and give it the Secretary.

I do not wish to orally address THE COUNTY OF VENTURA ENVIRONMENTAL REPORT REVIEW COMMITTEE, but for the record I submit my written statement on the reverse side of this card to express my opinion on the following agenda item:

Name:

DAVID DuVARNAY

Address:

202 W El Poblar

Phone No.

646-2114

Organization:

MEMBERS OAKS County water Dist

Agenda Subject/Item Number:

August 30, 2004

Jon Vivanti
U.S. Army Corps of Engineers
915 Wilshire Blvd.
Los Angeles, CA 90017-3401

RECEIVED

Subject: Matilija Dam Ecosystem Restoration Project / Draft EIS-EIR

OCT 1 2 2004

Dear Mr. Vivanti:

WATERSHED PROTECTION DIST.

Thank you for the opportunity to review the subject documents. This is written to provide comments and concerns with the proposed alternative. Please include your consideration of these comments in the final environmental document(s) for the project.

The documents appear to address many of the issues associated with this well intentioned project. However at least one specific flooding issue does not appear to be addressed.

Aggradation of the Ventura River in reach 3 (San Antonio Creek to Foster Park) can be reasonably expected to have significant impacts to flood hazards in Casitas Springs. The affects of aggradation upon the flood levels of tributary creeks needs to be more carefully considered and impacts need to be mitigated.

Much of Casitas Springs is drained to Fresno Creek. The Ventura County Watershed Protection District maintains a channel between Highway 33 and the Ventura River. This channel presently suffers from several problems, including depositions at the Ventura River confluence raising the flood waters. At present Ventura River elevations, Fresno Creek has flooded portions of Casitas Springs no less than three times in the past 12 years, even to the extent of closing Highway 33 in 1995 and 1998. Indeed the present Fresno Creek flood stage elevation is above the existing street drains. It is evident that any project alternative that will aggrade the Ventura River near the Fresno Creek confluence will have a dramatic increase of flood risk in Casitas Springs.

To pass any significant portion of the accumulated sediment through Ventura River's reach 3 will necessitate improvements to the capacity of Fresno Creek. I trust that reasonable improvements can be added to eliminate the flooding impacts of the subject project.

Very truly yours,

John M. Dickenson
8305 Edison Drive
Casitas Springs, CA 93001



Ventura County
Watershed Protection District
Water Quality/Environmental Services Division

MEMORANDUM

DATE: October 20, 2004

TO: Bruce Smith, Chair
Ventura County Environmental Report Review Committee

FROM: Pam Lindsey, Watershed Ecologist
Jon Vivanti, USACE Project Manager

SUBJECT: Matilija Dam Ecosystem Restoration Feasibility Study
Responses to October 13, 2004 ERRC Meeting Comments

The Ventura County Environmental Report Review Committee met Wednesday, October 13, 2004 at 1:30 pm in the Board of Supervisors Room, County of Ventura Government Center, Hall of Administration, 800 South Victoria Avenue, Ventura, California. Comments were heard from 9 speakers and four letters were submitted. One additional letter that was not received at the ERRC Hearing but for which we have provided comments is also included for the record.

The comments are addressed below by speaker and letter. The letters are attached for reference.

The contents of this document will be incorporated into the Final EIS/R presented to the Board of Supervisors for certification scheduled for December, 2004. Responses to these comments represent revisions to the Final EIS/R presented to the ERRC for review.

Exhibit 1: Ventura County Air Pollution Control District (Alicia Stratton)

A full written response will be provided to the APCD and ERRC under separate cover.

Exhibit A: Meiners Oaks County Water District (David Duvarney)

Comment 1. The proposed project will incrementally increase the 100-year floodplain limits in some areas of the Ventura River according to the studies conducted for the project

(Main Report, Appendix D). Although, most of the net change occurs within the current regulatory FEMA 100-year floodplain limits.

Two wells located at the margins of the Ventura River floodplain area outside the active channel were identified as impacted by the net change in floodplain limits. However, these wells are currently shown as being part of the current FEMA 100-year floodplain. Therefore, the incremental increase in floodplain and subsequent risk to these two wells is considered a less than significant adverse impact.

The siting of sediment disposal areas will be further refined in the design phase to avoid impacts to existing wells. Meetings between the VCWPD, the Corps, and well stakeholders will occur during this phase to ensure all potential impact issues are resolved.

Exhibit B: James B. Ruch (written submission)

Comment 1: Additional meetings with stakeholders to discuss water rights and water supply will be held during the detailed design phase of the project.

Comment 2: The second paragraph of Response GR-P1 on Page 4-12 of the FEIS/R will be deleted and the following explanation will be added to the remaining text.

The lease between the County of Ventura and the Casitas MWD that allows Casitas to operate Matilija Dam as a diversion facility expires in January of 2009, prior to expected initiation of dam removal. Therefore, Casitas MWD legally does not have rights to the water supply provided by this diversion activity after January of 2009. However, the project technical project team has calculated this amount of water both to determine the significance under CEQA/NEPA to overall water supply of the Ventura River and to explore opportunities to offset losses.

Water supply currently available due to the Matilija Dam reservoir will be lost both with the proposed project and under the No Action alternative. With implementation of the project, the reservoir will be lost 11 years sooner than the No Action alternative. The loss of water is considered an adverse, but less than significant impact (Class III) because it represents a small portion of the overall water supply of the Ventura River Basin, compared to the No Action alternative. Further, the Ventura River Basin is not currently overdrafted. Per the Ventura County Initial Study Assessment Guidelines, a significant impact is defined as the causing the overdrafting of surface water in a basin or further withdrawing water from an already overdrafted basin.

The loss of water refers to the storage capacity of the lake currently managed by Casitas MWD to maximize diversion opportunities. Once the dam is removed or the lake fills completely with sediment (under No Action), water previously trapped by the dam would flow downstream and under many circumstances would be available for diversion

and aquifer recharge, thereby retaining at least a portion of the current beneficial uses and availability.

Casitas MWD currently (2003) diverts an average of 590 ac-ft of water per year by controlling releases of water trapped behind Matilija Dam. This represents about 5% of the average amount (12,500 ac-ft) diverted by Casitas from the Robles facility per year, although water diversions vary from 0 to 45,000 ac-ft depending on the rainfall. The Robles facility provides approximately one-half of the Casitas MWD water supply.

Deconstruction of Matilija Dam is expected to begin in 2009, therefore the potential water losses are calculated beginning with this date. Over the course of 11 years following 2009, the water supply will diminish substantially under the No Action alternative from 2% (estimated for 2009) of the annual diversion to near zero in 2020. Matilija Dam will continue to fill with sediment and the effective storage of the dam will be 230 ac-ft in 2009 and less than 50 ac-ft in by 2020 (Table 5.23, p. 169 of Appendix D of the Main Report, Hydrologic, Hydraulic and Sediment Transport Studies). This assumes that the current trap efficiency is 45% and the trap efficiency decreases with storage capacity and that extreme variability in annual hydrology conditions does not occur during this period.

The total estimated loss of water is 2,200 ac-ft for the time period between 2009 and 2020. The current benefit of Matilija Dam to the diversion capacity at Robles will be unavailable after 2020. The projection of the cumulative benefit, starting in 2003, of Matilija Dam is shown in Figure 2.19 on p. 99 of Main Report Appendix D. To generate this graph, it was assumed that the benefit in 2003 was 590 ac-ft/yr and the benefit was assumed to decrease linearly with the storage capacity of Matilija Reservoir. The storage capacity was taken from Table 5.23. Based on this analysis, the total benefit of Matilija Dam under the Without-Project Conditions is approximately 5,000 ac-ft from 2003 until the reservoir capacity is completely gone, which occurs effectively in 2020. If the total benefit is calculated from 2009, the benefit is approximately 2,200 ac-ft.

To offset the loss of water, estimated to total 2,200 ac-ft, the technical project team is investigating opportunities that would replace the benefits of this water without incurring new and substantial impacts to regional water supplies.

Comment 3: The water trapped in the sediments behind Matilija Dam is not currently utilized as a water supply and do not represent an adverse water supply impact caused by the proposed project compared to the no project alternative.

The original water capacity of Matilija Reservoir was 7,018 ac-ft following construction of the dam in 1947. The original dam crest was at an elevation of 1125 ft. The dam was notched to an elevation of 1,095 ft in 1965 due to safety concerns and the reservoir capacity was reduced to 3,856 ac-ft. Since that time, sediment has filled in the reservoir and reduced its "open water" capacity to 500 ac-ft. The amount of sediment that

would store water could be approximated by subtracting the 500 ac-ft from the 3,856 ac-ft of storage after notching, approximately 3,356 ac-ft.

Tests conducted for the Feasibility Study measured the bulk density of the sediment in the reservoir area to be 72 lb/ft³. Approximately half of the sediment available to store water can be classified as "reservoir sediment" and half as "delta sediment." The reservoir sediment is 18% sand, 52% silt, and 30% clay. The sediment in the delta area comprises 13 % gravel, 54 % sand, 28 % silt, and 5 % clay. Therefore, of the sediments available to store water approximately 17.5% is clay, 40 % is silt, 36 % is sand, and 6.5 % is gravel. Based upon the data from Morris and Johnson (1967) the average specific yields of gravel, sand, silt and clay are approximately 25%, 25%, 8%, and 3%. This results in a weighted average specific yield of 15%. There is some uncertainty in this estimate, but it is likely that the specific yield would be between 7 % and 25%. Using this range of estimates, the amount of water trapped in the sediment could be between 230 and 840 ac-ft.

Water stored in the sediments was available at one time by a 48-inch diameter outlet structure located in the middle of the dam. This outlet has been inoperable since the 1969 flood events. Casitas Municipal Water District operates the currently serviceable outlet closer to the top of the dam. To access the water within the reservoir sediments, either sediment would have to be excavated from behind the dam to allow water out of the lower outlet, or groundwater wells would have to be installed in the reservoir area. Restoring function to the outlet structure and installing wells would not be cost efficient for the resultant water yield. Neither of these operations to utilize stored water has been conducted by Casitas MWD and therefore, this water was not considered as a current source of water supply. No change in water supply would occur with implementation of the project. Therefore, no adverse or significant impact to water supply would occur with implementation of the project.

Because water stored in the sediments has not been drained via an outlet structure, once filled, this aquifer traps water losing it to evaporation and transpiration near the surface and through cracks in the bedrock below. Therefore, this water is not considered an annual renewable source as stated by Mr. Ruch. After implementation of the project, water will not become trapped behind the dam, resulting in a beneficial impact.

Most of the water currently trapped in the sediments will be utilized during grading and slurry activities in Reach 7. Currently saturated fines will be mixed with additional water during slurry activities. If water draining from the non-slurried sediments is captured during dewatering activities (sump pumps and coffer dams) it will likely be used for on site dust control and compaction. Much of the water will adhere to the sediment particles and not be available for extraction, and will simply be moved with the material during construction.

Exhibit C: Arnold, Bleuel, Larochelle, Mathews & Zirbel, LLP (Zirbel)

Comment 1: More recent studies indicate that the levee protection at Cañada Larga described in the DEIS/R may not be necessary as originally described. However, instead of removing the levee protection at Cañada Larga from the project description, it remains part of the proposed project (4b). Changes to the EIS/R text have been made to provide consistency throughout the document. Revisions were made to the Draft EIS/R text as follows.

Page 3-10. top of page, add bullet:

Cañada Larga- Levee or floodwall to 3.0 feet

Page 3-30 Table 3-7: Alternative 4b, add to Downstream Improvements:

Cañada Larga- Levee or floodwall / Levee-wall 3 ft. avg. for approx 2,300 linear feet

The response to Comment 1 (Page 4-19 FEIS/R) of the August 24, 2004 letter from John Correa has been revised to read "The 3.0 foot levee/floodwall at Canada Larga remains as a feature of Alternative 4b. Additional risk and uncertainty analyses will be performed at the next phase of the project (detailed design work) to further define necessary flood protection at the Ojai Valley Sanitary District Wastewater Treatment Facility, including ancillary facilities and pipelines."

Text added to page 5.2-7: As a result of the technical analyses conducted for the Feasibility Study, project features were added to Alternative 4b to provide flood protection to residential communities, roads and infrastructure, utility lines, and public works facilities including ancillary facilities and pipelines. Although not all of these facilities have been specifically addressed herein, all will be protected to the same degree and consistent with the same criteria for flood protection caused by the implementation of the project.

Comment 2: Flood protection components are included as project components that reduce the flood hazard impacts to Class III, adverse but less than significant. Text will be added to the Flood Hazards section on page 5.2-7 for clarification. In addition, although mitigation measures are not usually listed for Class III impacts, a mitigation measure will be added to ensure flood protection at the Ojai Valley Sanitary District, as follows.

"Mitigation Measure F-1. The Project shall protect the Ojai Valley Wastewater Treatment Plant and associated Ojai Valley Sanitary District Wastewater Collection Facilities from flood inundation which would occur as a result of the Project to the same degree, and consistent with the same criteria, as provided by the Project to other affected facilities and residential communities."

Speaker Card 1: Troy Whitteker, Meiners Oaks County Water District

See responses to David Duvarney and Matt Bryant.

Speaker Card 2: Jim Ruch, Ojai Water Conservation District and Ojai Groundwater Basin Management Agency

See response to written comments received in Exhibit B.

Speaker Card 3: Mark Zirbel, representing Ojai Valley Sanitary District

See response to written comments received in Exhibit C.

Speaker Card 4: John Correa, General Manager, Ojai Valley Sanitary District

Mr. Correa was concerned that the additional flood and erosion risk posed by the proposed project was not adequately mitigated in the FEIS/R. See responses to written comments provided in Exhibit C.

Speaker Card 5: Matt Bryant, Ventura River County Water District

Comment 1: Mr. Bryant is concerned about the statement on Page 5.2.9 "The removal of Matilija Dam could potentially deplete groundwater or surface water supplies or interfere with groundwater flow or recharge due to increases in turbidity and sedimentation." The FEIS/R states that impacts caused by the project are adverse, but less than significant (Class III). This conclusion is located on Page 2-11, end of the second paragraph. Text explaining the impact conclusion is provided as clarification on Page 2-10 of the FEIS/R, as well as Page 4-10 GR-M Wells.

Comment 2: Mr. Bryant was also concerned about potential sediment contaminants that could be released as part of the proposed project. The response to this comment is presented below.

The sediments impounded behind Matilija Dam have been derived from a primarily wilderness watershed with no known sources of contamination. The expectation is that these impounded sediments are no different than what is currently being contributed by the watershed. To assure the quality of the impounded sediment, chemistry testing was performed based on geotechnical investigations conducted in 2001 for the Matilija Dam Ecosystem Restoration Feasibility Study. A total of 81 analyses were tested for in the sampled sediments from 15 boreholes drilled in the reservoir basin. The results of these analyses are presented in the Impounded Sediment Characterization Report, prepared by the Corps of Engineers (dated April 2002). The assessment of the laboratory results state that there is no evidence to support classifying any of the sediments sampled as hazardous materials.

In response to the ERRC inquiry as to the reason for the lack of reference to detected contaminant levels associated with impounded sediments in the comment letter from California Regional Water Quality Control Board (CRWQCB), received during public review of the EIS/EIR document. On 15 October 2004, Jon Vivanti (Corps) had a follow-up conversation with Shirley Birosik of CRWQCB to discuss that agency's position on the issue. Ms. Birosik stated that the contaminant level raw data was supportive of typical background levels found in California. An email statement dated 18 October 2004 from Ms. Birosik has been provided as supporting documentation for this query.

With regard to testing for uranium in the impounded sediment, the 2001 geotechnical field investigations did not specifically test for this element. No evidence has been presented indicating a likely presence of uranium. Therefore, the presence of uranium is considered speculative. The Corps' Impounded Sediment Characterization Report indicates that a uranium-bearing mineral known as torbernite [hydrated copper-uranyl phosphate) was found in a local mining prospect; however based on a location map of the prospect, the site was determined by the Corps not to be within the contributing watershed to this study. In any case, to test for the presence of uranium in the impounded sediment, testing for copper, an element associated with torbernite (though not exclusively) was conducted. The results of the analyses indicate that copper was not substantially elevated in any samples; in only three samples, copper concentrations slightly exceeded National Oceanic and Atmospheric Administration ERL (Effects Range-Low) levels. In a 19 October 2004 response to a follow-up email from Jon Vivanti to Ms. Birosik regarding uranium, Ms. Birosik indicated that she had no particular reason to suspect that uranium will be a problem (based on the laboratory results), however specific testing for the element should be performed if there is a potential concern. The email from Ms. Birosik has been provided as supporting documentation for this query.

For this feasibility study, the Corps' position is that a satisfactory level of assessment of potential contaminants in the impounded sediments has been established. During the design phase of the project, additional confirmatory testing and consultation with CRWQCB will occur. Follow-up actions, as deemed appropriate, resulting from these consultations will be pursued by the Corps and Ventura County Watershed Protection District.

Comment 3: Mr. Bryant recommended that tertiary treated water from Ojai Valley Sanitary District should be used for the slurry line instead of potable, treated water from Lake Casitas or like sources. This comment is repeated from his August 25th, 2004 correspondence to Jon Vivanti (Bryant #2). The response to Comment 1 on page 4-19 of the FEIS/R will be changed as follows to further address this issue.

1. Tertiary treated water will remain as a potential water source option for the project. However, it was initially dismissed for the following reasons.

- Water is available from Lake Casitas without significant impacts to water supply resources.
- It would be more costly to pump water from OVSD, which is much further downstream and the pipeline could cause additional environmental impacts.
- Diversion of water releases from the lower Ventura River would adversely impact beneficial uses of the water in that area.
- The water could only be utilized if it met the LARWQCB standards for the upper Ventura River Basin. Reverse osmosis treatment would guarantee the water would meet these standards. Additional study would be needed to determine if the OVSD water could be released in the upper watershed.

Speaker Card 6: Harlehajan S. Thind

No response needed.

Speaker Card 7: Norm Davis, Meiners Oaks Water District

See responses to Bryant and Duvarney, above.

Speaker Card 8: John Duncan

Mr. Duncan's primary concern regards potential contamination of the water supply. This comment is addressed in Bryant, above, regarding potential contaminants.

ERRC Question 1: Potential Slurry Line Water Source Impacts

ERRC asked that we address potential impacts to the water supply source used to supply the slurry line. According to Don Davis, City of Ventura, the water is available for the slurry activities without adversely impacting water supplies, as described below.

According to the Ventura County Initial Study Assessment Guidelines, thresholds of significance for the impacts to groundwater are summarized as follows:

Impacts would be considered significant if the project causes a:

- direct or indirect decreases in net quantity of water in an overdrafted basin;
- basin to become overdrafted;
- result in an increase in extraction from a basin without reliable data; and/or
- in the Fox Canyon Basin, any activities that do not comply with the Fox Canyon Groundwater Management Agency Ordinance.

The City of Ventura obtains water from three sources: Lake Casitas, Fox Canyon Groundwater Basin, and the Santa Paula Groundwater Basin. Each of these sources is currently underutilized by the City, leaving water balances available for the Matilija Dam project needs, specifically the 4,800 ac-ft needed for the slurry line.

The City currently maintains an annual 8,000 ac-ft allocation from Lake Casitas, but presently uses only 6,000 ac-ft. In Fox Canyon, the City has 30,000 ac-ft in reserves, which represents water they have been allocated but have not utilized in the past years. Allocations in the Santa Paula Basin include 3,000 ac-ft each year, with only 1,500 ac-ft withdrawn annually.

The scenario proposed by the City for providing the water entails 4,800 ac-ft from Lake Casitas to be directed to the Matilija Project, leaving approximately 3,000 ac-ft for the City to use. The remaining 3,000 ac-ft that the City needs would be made up by utilizing the remaining 1,500 ac-ft from the Santa Paula Basin and withdrawing reserves from the Fox Canyon Basin.

Because the City is allocated more water than it needs each year and maintains reserves, providing the water to the Matilija Project would not result in significant impacts to these water sources. In an average water year impacts to the Lake Casitas, Fox Canyon, and Santa Paula water supplies would not result in overdrafts of groundwater resources. Drought conditions may change allocations, but likely not to the extent that these water supplies would become unavailable for project use.

John Dickenson Letter dated August 30th, 2004

Comment 1: Fresno Drain collects and conveys water from the lower Casitas Springs area westward in a concrete-lined channel through the existing Casitas Springs Levee. Flooding at the Fresno Drain is expected to increase due to the potential for the flood water elevation in the Ventura River to be approximately two feet higher than present. Water cannot drain effectively from the Fresno Drain into the Ventura River when the river has high flows, resulting in flooding at the confluence. During the design phase, as part of the proposed improvements to the Casitas Levee, the increase in flood risk associated with the project will be mitigated via the appropriate improvements.

The canal for the Fresno Drain through Casitas Springs has a bottom elevation of about 259 ft. The walls of the canal are estimated to be 4 feet high to bring the top of walls of the canal to an elevation of 263 ft. The top of the Casitas levee at this location is approximately 266 ft. Therefore, the walls of the Fresno Drain through Casitas Springs are approximately 3 feet lower than the Casitas Levee.

The 100-yr flood in the Ventura River has an elevation of about 265 ft and therefore the water from the Ventura River can enter into the Fresno Drain and cause about 2 feet of flooding under current conditions. Based on our analysis, the project will increase the elevations about 2 feet in this area to approximately 267 ft. Therefore, the walls on either side of the Fresno Drain through Casitas Springs would have to be raised at least 2 feet to mitigate impacts caused by the project. Floodwalls approximately 4 feet higher would be

required to solve both the existing flooding problem and that caused by the proposed project during 100-yr flood conditions.



Ventura County
Watershed Protection District
Water Quality/Environmental Services Division

MEMORANDUM

DATE: November 8, 2004

TO: Alicia Stratton, APCD

FROM: Pam Lindsey, Watershed Ecologist

SUBJECT: Response to APCD Comments on the
Matilija Dam Ecosystem Restoration Feasibility Study
Draft EIS/EIR

Unfortunately, the U.S. Army Corps of Engineers and the Watershed Protection District did not receive your comment letter dated August 30, 2004, the last day of the comment period, until well after this date likely due to electronic mail malfunction. However, we have respectfully responded to your comments, which are provided herein. Your letter is attached for reference.

General Comment – 8-hour Ozone Significance Determination

The following provides clarification regarding the potential for project impacts due to the newly designated 8-hour ozone standard. Ventura County was designated as a moderate 8-hour ozone nonattainment area, which became effective June 15, 2004. The project's ozone significance determination was performed using the standard CEQA checklist criteria and the VCAPCD CEQA guidelines.

Checklist Criteria

Two standard CEQA checklist criteria used in the DEIR that apply to the ozone impact comment are as follows:

- Conflict with or obstruct implementation of the VCAPCD Air Quality Management Plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation, whether solely or cumulatively¹.

¹ This is a NEPA and CEQA significance threshold when assessing the potential to violate NAAQS, but only a CEQA significance threshold when assessing the potential to violate CAAQS.

The project would not conflict with or obstruct implementation of the VCAPCD Air Quality Management Plan (AQMP). The AQMP addresses attainment with the federal 1-hour ozone standard, which is forecast for attainment in 2005 some two or more years prior to the major project work tasks, but does not address the 8-hour ozone standard. The project cannot be shown to conflict or obstruct with a non-existent plan. However, the main project activities are currently forecast to be completed prior to the maximum attainment date of 2010, and so could not conflict with attainment at the time of the maximum attainment date.

The comment noted that all project alternatives would likely have a significant adverse and unmitigable impact on air quality in Ventura County, with some emphasis on the Ojai Valley where exceedances of the State 1-hour standard and Federal 8-hour standard still occur. While it is conceded that the project would cause emissions of ozone precursors, it was concluded based on the significance criteria being evaluated that the project emissions would not contribute *substantially* to an existing or projected 1-hour or 8-hour ozone air quality violation.

VCAPCD Significance Criteria

The VCAPCD guidelines (p. 5-3,4) state:

Construction-related emissions (including portable engines and portable engine-driven equipment subject to the ARB's Statewide Portable Equipment Registration Program, and used for construction operations or repair and maintenance activities) of ROC and NOx are not counted towards the two significance thresholds, since these emissions are temporary. However, construction-related emissions should be mitigated if estimates of ROC and NOx emissions from the heavy-duty construction equipment anticipated to be used for a particular project exceed the 5 pounds per day threshold in the Ojai Planning Area, or the 25 pounds per day threshold in the remainder of the county.

The DEIS addresses all potential ozone impacts, whether they are 1-hour or 8-hour impacts. Our findings for this *temporary construction* project are that it would be mitigated to the extent feasible consistent with the VCAPCD CEQA Guidelines and that the project's operating emissions are less than the VCAPCD CEQA significance threshold. Therefore the project's ozone precursor emissions do not result in significant impacts based on this specific significance criterion.

The VCAPCD Guidelines also provide two other significance criteria for ozone impacts based on AQMP consistency, specifically related to population growth assumptions used in the AQMP. The project is not a land use development project and would not result in any increases in population. Therefore, the project is not inconsistent with the growth

forecasts in the AQMP and would not result in significant impacts related to these two significance criteria.

General Conformity

The following provides clarification and additional information regarding the project's general conformity determination.

Appendix G-2 of the DEIS presents the conformity analysis and provides evidence that offsets are available from the District (Page G.2-6 notes that 240 tons of NO_x ERCs are currently available, more than three times the project need for the selected project alternative) and notes that there are other methods available to create new emission reductions in the case that insufficient NO_x ERCs can be leased for the duration of the project years that will exceed the NO_x *de minimus* threshold. The available NO_x ERCs were determined through the review of the District's online offset bank at the time of the preparation of the conformity analysis². Since the project has only to lease credits for a year or two, not buy them from the current holders, it is reasonable to assume that many of the current ERC holders that do not have definitive plans to use their ERCs during the two year window that the project may need ERCs would be willing to lease those ERCs. Additionally, the project's need for offsets will not occur until 2007 at the earliest, so there is ample time to obtain ERC leases or create new offsets if they are in fact necessary. Mitigation Measure A-5 specifies the requirement to obtain the NO_x emission offsets, if necessary, and the future Mitigation Monitoring Plan will identify the specific requirements and timelines to implement this mitigation measure.

However, it is important to realize that, as noted by the VCAPCD in their "General Comment", the 8-hour ozone attainment designation has been completed and Ventura County has been designated as Moderate Nonattainment. As noted in the DEIS (p. 5.6-1) this means that conformity determinations will be based on the 8-hour ozone designation as of July 15, 2005. This should result in the *de minimus* emission thresholds being revised to 100 tons/year for NO_x and ROC. Therefore, while a conformity analysis was performed as recommended by EPA guidance using the current *de minimus* emission thresholds it is understood that the revised requirements will eliminate the need for offsets from the selected project alternative, and that a revised conformity analysis will be prepared sometime after July 15, 2005.

As noted in 40 CFR Part 93.153 (i) "when the total of direct and indirect emissions of any pollutant from a Federal action does not equal or exceed the rates specified in paragraph (b) of this section, but represents 10 percent or more of a nonattainment or maintenance area's total emissions of that pollutant, the action is defined as a regionally significant action and the requirements of § 93.150 and §§ 93.155 through 93.160 shall apply for the

² The District's online offset bank can be found through link provided on the upper left of the following webpage... <http://www.vcapcd.org/permits.htm>.

Memorandum
November 8, 2004
Page 4 of 4

Federal action.” The project’s worst case daily NOx emissions are somewhat less than one ton per day, while the federally approved VCAPCD Air Quality Management Plan indicates NOx emissions of 42.1 tons/day. Therefore, it can be clearly seen that the project’s emissions are well less than the 10% threshold of 40 CFR Part 93.153 (i).

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**Ventura County
Watershed Protection District
Water Quality/Environmental Services Division**

ERRATA

DATE: December 7, 2004

TO: File

FROM: Pam Lindsey, Watershed Ecologist

SUBJECT: Matilija Dam Ecosystem Restoration Feasibility Study
Responses to October 13, 2004 ERRC Meeting Comments

The following changes are made as errata to the October 20, 2004 memorandum to Bruce Smith, ERRC Chair. These changes are clarifications of text and are indicated in strikethrough for deleted words and underlining for added words.

Page 2 of 10:

The lease between the County of Ventura and the Casitas MWD that allows Casitas to operate Matilija Dam as a diversion facility expires in January of 2009, prior to expected initiation of dam removal. Therefore, Casitas MWD legally does not have rights to the water supply provided by this diversion activity after January of 2009. However, the ~~project technical project team~~ VCWPD has calculated this amount of water both to determine the significance under CEQA/NEPA to overall water supply of the Ventura River and to explore opportunities to offset losses.

Page 3 of 10:

To offset the loss of water, estimated to total 2,200 ac-ft, the ~~technical project team~~ VCWPD is investigating opportunities that would replace the benefits of this water without incurring new and substantial impacts to regional water supplies.

Page 5 of 10:

~~"Mitigation Measure Condition~~ F-1. The Project shall protect the Ojai Valley Wastewater Treatment Plant and associated Ojai Valley Sanitary District Wastewater Collection Facilities from flood inundation which would occur as a result of the Project to the same degree, and consistent with the same criteria, as provided by the Project to other affected facilities and residential communities."

**MATILIJA DAM ECOSYSTEM RESTORATION FEASIBILITY STUDY
FINAL EIS/EIR
COMMENTS RECEIVED AFTER PUBLIC COMMENT PERIOD
WITH RESPONSES**

- A. Curtis J. Hopkins, Hopkins Groundwater Consulting
Letter to Meiner's Oaks County Water District dated November 11, 2004

Responses:

1. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1 and GR-P7 in the September Final EIS/EIR.
2. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1 and GR-P7 in the September Final EIS/EIR.
3. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1 and GR-P7 in the September Final EIS/EIR.
4. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1, GR-P7, and GR-1 in the September Final EIS/EIR.
5. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1 and GR-P7 in the September Final EIS/EIR.
6. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1 and GR-P7 in the September Final EIS/EIR.
7. See Revised Section "Groundwater and Surface Water Supplies" in Chapter 5.2 Hydrology and Water Resources in the "Errata and Supplemental Materials to the Final EIS/EIR for the Matilija Dam Ecosystem Restoration Feasibility Study dated December 2004 and General Responses GR-P1, GR-P7, and GR-X in the September Final EIS/EIR.

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November 11, 2004
Project No. 04-033-01

Meiners Oaks County Water District
202 West El Roblar Drive
Ojai, California 93023

Attention: Mr. Ron Singleton
General Manager

Subject: Matilija Dam Removal Impacts on Meiners Oaks County Water District Well Field,
Ojai, California.

Dear Mr. Singleton:

As you requested, Hopkins Groundwater Consultants, Inc. (Hopkins) is pleased to provide this brief letter-report to the Meiners Oaks County Water District (District) which summarizes our review of the proposed Matilija Dam removal options and develops an understanding on how dam removal may impact the groundwater supply provided by the District's well facilities. As part of this study Hopkins conducted a brief well site visit with District staff and obtained available District information regarding well location, construction, and general operation for review. As part of our review we studied the pertinent sections of reports which include:

1. Matilija Dam Ecosystem Restoration Feasibility Study, Final Report, (Main Report, and Appendix D), Dated September 2004.
2. Draft Environmental Impact Statement/Environmental Impact Report for the Matilija Dam Ecosystem Restoration Project, Dated July 2004.
3. Impounded Sediment Characterization, Matilija Dam, Matilija Creek Watershed, Ventura County, California, Dated April 2002.

For this study Hopkins focused mostly on the recommended plan (Alternative 4B) which is presented in the project study final report as the most viable alternative for dam removal, and how that plan could potentially impact the District operations. We understand that well operation is essential to providing a water supply to meet the demands within the District and that any impairment or interruption of this supply would likely be intolerable.

As you are aware, the District wells are located in Upper Ventura River groundwater basin and produce water primarily from shallow coarse-grained alluvial materials. The wells are

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P.O. Box 3596, Ventura, California 93006 Phone: (805) 653-5306 e-mail: chop4@earthlink.net

Meiners Oaks County Water District
November 11, 2004 (Project No. 04-033-01)

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located adjacent the presently active flow channel within the river flood plain. Produced groundwater from District Well Nos. 1 and 2, located immediately downstream of the dam, is considered by the California Department of Health Services as being under the influence of surface water. This is because of the short distance between the wells and the flowing river. Given these conditions, we evaluated the primary potential for the project to impact the District under 3 categories; water supply availability, water quality degradation, or well facility damages.

Water Supply Availability

Dam Removal Project Water Supply

The proposed project requires a water supply to allow slurry transport of sediment from behind the dam through a pipeline to downstream locations. The water supply for this phase of the project is proposed to be provided by the local production of groundwater, surface water diversion, or lake water supplied by Casitas Water District (CWD). A supply from CWD would be the preferred alternative for the District because it is assumed that with that supply the slurry project would not remove any water from the river system that has historically provided recharge to the groundwater produced by the District wells.

Groundwater production or surface water diversion both present the potential to impact the groundwater supply available to the District wells. The shallow alluvial aquifer system receives recharge through river bed infiltration, bedrock seepage, and direct precipitation. Of these sources, river bed infiltration is the most significant source of recharge to the system. The alluvial system has a relatively small storage capacity which results from its narrow and shallow geometry. As river flows diminish, direct recharge rates slow down and underflow through the aquifer sediment decreases. These changes result in groundwater level declines and consequently well discharge declines. Upstream production of groundwater or diversion of surface water for use in the slurry system would both contribute to diminished surface flows. These alternatives could directly impact the availability of the Districts water supply. —

Mudflow Deposition

During the course of the project fine grained materials will be exposed upstream of the District well field. The method of sediment removal and subsequent preparation of the area behind the dam for years of natural redistribution of sediments will be important to prevent mudflows or debris flows that could impact riverbed recharge in the vicinity of the District wells. If the project is conducted in a manner that will contain all fine grained sediments and prevent the development of conditions that could result in a mudflow or debris flow (i.e., severe erosion undercutting a bank or slope comprised of silt or clay), the potential impact of these geological conditions could be mitigated.

Meiners Oaks County Water District
November 11, 2004 (Project No. 04-033-01)

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Silt Laden River Flows

Winter flood flows are naturally laden with fine-grained silt and clay materials that generally remain entrained in the turbulent flows and continue downstream to the ocean. As flows recede toward the end of the winter season, the clearer river water does not typically carry significant loads of fine materials. Should dam removal operations or natural processes in subsequent years result in sediment rich low-flow conditions, excessive plugging along the river channel could occur. This condition could effectively seal the established river channel and reduce the amount of infiltration that historically has recharged the groundwater produced by the District wells. To prevent the potential of this condition developing, best management practices should be implemented during the dam removal process (to reduce sediment runoff) and prudent erosion control plans should be implemented to stabilize the sediment that remains upstream after dam removal is complete.

3

Water Quality Degradation

Groundwater quality is a product of many factors that include; a) the recharge source water quality, b) the chemistry that is derived from the subsurface materials through which it flows, and c) the travel time that the water is exposed to those materials. In typical aquifer systems the fine-grained silt and clay layers, where water moves very slowly, contain poorer quality water with a higher concentration of total dissolved solids. The sand and gravel layers, that are flushed more frequently (and typically contain less organic matter), generally contain groundwater of better quality. Additional changes to water quality occur when groundwater moves from an aerobic to an anaerobic condition. This change generally significantly affects the chemistry of the groundwater. In general, the quality of groundwater in the alluvium along the Ventura River was developed under aerobic conditions. It is most probable that the groundwater contained in the sediment behind the Matilija Dam exists under anaerobic conditions and is a significantly different quality than that of the alluvial aquifer produced by the District.

4

The District has historically tested the groundwater quality produced from its wells. The groundwater supply has been of sufficient quality to distribute in the District system for potable uses and has not required treatment beyond disinfection. Since the regulatory changes that categorized the District Well Nos. 1 and 2 as "under the influence of surface water", the District has provided filtration to reduce turbidity and further prepare the water for disinfection. The upper Ventura River Basin groundwater is produced from coarser-grained deposits that are rapidly flushed and do not typically stagnate. Deposits behind the dam have contained stagnate groundwater for 10's of years and are largely comprised of fine-grained sediments and organic materials. These conditions may produce water that is concentrated in dissolved minerals, bacteria, and anaerobically formed dissolved gasses. These potential conditions were recognized in the project studies; however, they were dismissed as likely being insignificant and that there was no mitigation monitoring required or proposed to protect the District well field from these potentially problematic conditions. The water quality conditions that we believe may be of

Mainers Oaks County Water District
November 11, 2004 (Project No. 04-033-01)

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concern to the District include; increases in dissolved minerals, elevated bacteriological counts, turbidity, and accelerated corrosion. The first 3 impacts could primarily affect the suitability of the supply for its designated uses, while corrosion might affect the well casings, pump equipment, and pipelines within the District. The District is responsible for compliance with the full set of State of California Title 22 drinking water standards which are mandated by the State for a public water system supply. If the dam removal project threatens the District's ability to comply with these standards, the District should be concerned.

Well Facility Damage

Erosion and Deposition

Physical impacts to the District's well facilities would be equally devastating to the reliability of this source of water supply. It is essential for the District to maintain operable wells that can provide the maximum daily demand on its system, and to have backup wells that can be activated when repair and maintenance is necessary on the main production wells. It is our understanding that the District has 4 active wells at the present time. Two wells are located upstream within a narrow portion of the upper Ventura River alluvium where bedrock outcrops on each side of the canyon confine the river to its channel. The other 2 wells are located approximately 2 miles down stream where the river flood plain has been developed and shaped as the braided active river channel meanders back and forth.

The Ventura River active channel location changes as a result of active deposition and erosion of river channel materials. The removal of the dam will restore the river environment to a state that existed prior to the formation of the District. The Matilija Dam construction was completed in 1947, two years prior to the formation of the District in 1949. The District wells have been subjected to high flow events of the Ventura River; however, the sediment load in the river did not include sediment from the west fork of the Matilija Creek. The effect of re-introducing additional sediment to the Ventura River system upstream of the District wells was considered by the project study; however, they were dismissed as likely being insignificant and that there was no mitigation monitoring required or proposed to protect the District well field from potentially adverse erosion conditions. The conditions that we believe the District should be concerned about may develop if additional deposition occurs in the reaches of the river adjacent either well field, and the active channel migrates toward the wells. This could result in direct well damage from flood flow forces, or cause a reclassification of the lower well field as being "under the influence of surface water."

Surface Water Influence

Redirected river flows that encroach a 150-foot-setback distance would require the District to restrict use of the lower river wells or construct the mandated treatment facilities for wells that produce groundwater that is classified as being under the influence of surface water. River channel migration resulting from sediment deposition in the presently active channel could

Meiners Oaks County Water District
November 11, 2004 (Project No. 04-033-01)

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potentially cause the condition to develop. It is our understanding that a disposal area for dredge materials is being considered in the vicinity of the District downstream wells. The closer the dredge deposit area is to the wells, the greater chance that the groundwater quality produced by the wells could be influenced. Additionally, if dredge discharge flows encroach on the 150-foot-setback distance around the wells, the State may consider the wells to be under surface water influence and District use may be restricted. We are not certain that the impacts of this potential condition were considered by the project studies.

6

District Mitigation Monitoring

It is our opinion that the District should be concerned about a number of potential impacts that the project could have on its groundwater supply. Because the project studies concluded that the impacts considered will not be significant, there were no mitigation monitoring measures proposed to protect the District well supply in the event adverse conditions developed. Because of the importance of the well water supply, we recommend the District consider requesting that monitoring be included as part of the project conditions, or at least implementing its own monitoring program in order to protect the groundwater facilities and the quality of the supply that is provided to its customers. If required, we recommend the District develop a program that will sufficiently document pre-project conditions and consolidate its historical data which will provide a baseline of conditions that include well performance and water quality.

7

We recommend the District consider a program that includes compilation of; a) routine photographic documentation of river channel and well facilities conditions, b) ongoing well production and well performance records, and c) existing water quality and routine monitoring of key chemical constituents. Based on the findings of the pre-construction monitoring program, the District may wish to consider if any changes in monitoring frequency or the addition of testing or observations should be included during the performance of dam removal activities.

We trust this letter-report is informative and responsive to the needs of the District. If you have any questions or need any additional information, please do not hesitate to call. Hopkins is pleased to have this opportunity to be of service. We will remain available should the District require assistance in developing a formal monitoring program.

Sincerely,

HOPKINS GROUNDWATER CONSULTANTS, INC.

Curtis J. Hopkins
Certified Engineering Geologist EG 1800
Certified Hydrogeologist HG 114

