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### Prospect Island Land Evaluation and Site Assessment

As you requested, enclosed is a copy of the Department of Water Resources' Land Evaluation and Site Assessment for the Prospect Island Restoration Project. Although this analysis is optional under the California Environmental Quality Act, we conducted this assessment at your suggestion because of the California Department of Food and Agriculture's concerns regarding restoration projects in the Delta and impacts to agriculture. After conducting the analysis, however, we find that LESA is inappropriate when analyzing the Prospect Island Restoration Project impacts on agriculture because of site-specific conditions not addressed by LESA and because this project would create open space that would be compatible with existing agriculture. For these reasons, DWR opted to analyze project impacts to agriculture with the more traditional CEQA approach, by considering the impacts from actual changes in the physical environment and the significance of the impacts.

The Prospect Island project will convert existing agricultural land to a less intensive use that will be compatible with agriculture. The managed wetland will prevent urban development of Prospect Island. Neighboring agricultural land will not have increased flood risks from the restored wetland because the project has been designed to prevent wind and wave action on the Ryer Island project levee. The project should increase available water for neighboring farmers because water will not be used for agriculture on Prospect Island.

While the purpose of the Prospect Island Restoration Project is to provide habitat to endangered species, it is not likely that this will result in specific restrictions to neighbors of Prospect Island and will not likely result in increased pumping restrictions Delta-wide. As an example, the U.S. Fish and Wildlife Service's 1996 recovery plan for Delta smelt indicated that wide distribution and high numbers of rearing juveniles have been shown to lower risk to Delta smelt. One of the objectives of the Prospect Island Restoration Project is to increase the number of rearing juveniles. Therefore, the Prospect Island project should result in lower risk to Delta smelt and fewer pumping restrictions Delta-wide, a benefit to farmers.

Robin Reynolds  
June 10, 1998  
Page Two

We also found that LESA does not address project site-specific conditions such as the propensity and vulnerability of Prospect Island to flood. Prospect Island was originally designed to be part of the Sacramento Flood Control System. As such, its levees were built to overtop during flood events and consequently are lower than neighboring levees. As a result, Prospect Island has flooded seven times in the last 17 years, resulting in loss of crops, damage to ditches, canals, roads, pumps and other agricultural infrastructure. In 1996 for example, the United States Bureau of Reclamation spent nearly \$600,000 in pump-out costs, dike repair, excavation and ditch cleaning (an amount for maintenance which approximately doubles crop revenue). Despite good agricultural soils and available water, the propensity of Prospect Island to flood may have limited the economic viability of practicing agriculture. This may be one reason why the landowner/farmer sold the land to the Trust for Public Lands for the habitat restoration project.

In conclusion, we have found that the enclosed Land Evaluation and Site Assessment for Prospect Island is not applicable for analyzing this project's impact on agriculture. Specifically, LESA was developed to consider the impacts of converting land from low density use such as agriculture to a higher density use such as urban development. In this case, conversion of Prospect Island to a wetland is a use compatible with agriculture on adjacent lands. LESA also does not consider site-specific factors such as the propensity and vulnerability of Prospect Island to flood that may limit the economic viability of farming on the land. Therefore, based on the traditional CEQA analysis of considering actual impacts, we believe that the Prospect Island project will not have a significant adverse impact on agriculture.

Please call me at (916) 227-7548 if you have any questions.

**Original signed by:**

Leo Winternitz, Chief  
Compliance and Monitoring Branch

Enclosures: Land Evaluation and Site Assessment Score Sheets  
1977 Solano County Soil Survey Map  
Zone of Influence Assessor Parcel Numbers  
Department of Conservation Important Farmland Series Maps

cc: (See attached list)

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