

Review Comments
on
Draft Prospect Island Project Modification Report
U.S. Army Corps of Engineers, Sacramento District
October 1997

Main Report

Executive Summary:

- ES-1, bottom paragraph says plate 1 shows the tentatively selected plan; however, plate 1 shows alternative 1, which is *not* the tentatively selected plan. Plate 5 shows alternative 5, which is the tentatively selected plan.
- ES-2, first full paragraph, fourth sentence suggests the existence now of a breach on the ship channel side ("allows"). Also, the ship channel breach alone would not allow in-migrating salmon "up through Miner Slough."
- ES-2, first full paragraph also notes that one of the plan's two breaches is "at the upstream end of Miner Slough." In fact, the Miner Slough breach would be at the downstream end of the slough, just above the cross levee (plate 5).
- ES-3, second paragraph refers to "proposed Sacramento splittail." Suggest sentence be clarified to reflect that the splittail is proposed to be listed (as described on p. 21). This same clarification could be made in the introductory paragraph on ES-1.

Contents:

- P. iii lists plates 1-5 but not their location in the report. Plates 1-5 are near the end of the report (after appendix J) and are followed by five additional drawings; however, these five additional drawings are not listed in the Contents, and their purpose is unclear.

Chapter I:

- P. 4, middle of third paragraph, need to clarify what "This report" is.
- P. 4, bottom paragraph, last sentence defines measures as "unscreened water diversions; municipal, industrial, agricultural pollution;" etc. These are actually examples of problems, so the intended meaning should be clarified.
- P. 6, second paragraph says that a small section of the Sacramento River Flood Control Project will be modified. Because the flood control project is so large, it may be helpful to the reader to better define how the project will be modified by the proposed work on Prospect.
- P. 10, last paragraph describes the Central Valley Project. The CVP is a very large project and was not constructed in a single year (1933). Also, the purpose of the CVP as described in the first sentence should be clarified.

Chapter II:

- P. 14, last paragraph quotes a memo from the Service and says that this memo “resolved the water contractors’ concerns.” We suggest that this conclusion be specifically documented.
- P. 15, second paragraph, second sentence refers to “past and/or present use of agricultural chemicals in crop production” on Prospect Island. The island has been flooded since January 1997, so currently there is no crop production on it. The island has not been farmed since March 1995.
- P. 15, last paragraph, last sentence discusses the design of the Prospect Island so that the island “would flood before surrounding areas and accommodate floodflows.” We suggest this statement be documented.
- P. 16, first paragraph describes levees and flooding on Prospect Island. Documentation for the second sentence would be helpful. Also, the Miner Slough levee breach on Reclamation property was 300 feet wide; repair of this breach was completed in November 1997.
- P. 16, second paragraph, last sentence says that two landowners access their property along Prospect Island levees. The Hall Island landowner has legal access to his property via boat.
- P. 17, we suggest the title of the section on “Fisheries” and similar references throughout the report be changed to “Fish Resources” to accurately reflect the subject matter.
- P. 18, third paragraph says that most of Prospect Island is planted in crops. Although the land acquired by Reclamation was previously farmed, and it likely would be again without the Corps proposed wetlands project, it is not now planted in crops. Further, this land as well as the Port of Sacramento land has been flooded since January 1997.
- P. 18, fifth paragraph, last sentence refers to “other parcels of land on Prospect Island.” The report should clarify what these other parcels are.
- P. 19, figures 3 and 4 show portions of Prospect Island before it was flooded; i.e., not in its current condition. The figure captions should be revised to include the dates the photographs were taken and to clarify that the island is not currently farmed.
- P. 20, figures 5 and 6 show DFG’s property near Prospect. The report should clarify the relationship of this property to the proposed project on Prospect Island.
- P. 21, third paragraph says that the Service provided a species list on December 4, 1997. This date should be corrected.
- P. 21, last paragraph says that Prospect Island is privately owned and used for agriculture. The northern portion of the island was acquired by Reclamation and thus is Federally owned; neither the Federal land nor the Port land is currently used for agriculture.

Chapter III:

- P. 24, second paragraph compares acreage of pre-settlement riparian habitat in the Central Valley to a percentage reduction in the San Joaquin Valley. This comparison between the Central and San Joaquin Valleys is confusing because one valley includes the other. Also, the relevance of the San Joaquin Valley figure is unclear.
- P. 24, third paragraph refers to Resource Category 1. Because some readers may not be familiar with this term, the report should explain it.

- P. 28, third paragraph says that Reclamation has no plans to restore habitat on Prospect Island and that the site would continue to hold its current habitat values. The footnote citation is old (and unnecessary, considering events since 1995). Also, because Prospect Island is flooded, "current habitat values" would be wetland values. This paragraph should be revised to clearly distinguish between current conditions and anticipated future conditions without the project.

Chapter IV:

- P. 30, second full paragraph, last sentence refers to "transposing" data from Rio Vista tidal gage to the Prospect Island site. This term should be clarified.

- P. 30, last paragraph, next to last sentence says that the excavated channel would connect two levee breaches. It does not appear from plate 5 that this would be the case.

- P. 33, third full paragraph refers to other landowners' property on Prospect Island and the need to stabilize the island levee along Miner Slough. The report should clarify who these other landowners are and identify the "Egbert Cut" levees.

- P. 34, third paragraph says the "study area" would continue to be in Reclamation's ownership. Reclamation acquired the northern portion of the island; however, the Port of Sacramento owns the southern portion of the island.

- P. 35, Alternative 1, second bullet refers to "both cross levees." The report should clearly explain these two levees.

- P. 36, Alternative 2, fifth bullet refers to "breaches" along the ship channel levee. Plate 2 shows only one breach along this levee.

- P. 36, Alternative 2, next to last bullet cites the Port's property as a source of fill. Has the Port committed to making its fill available for the proposed project?

- P. 36, Alternative 3, first paragraph says that the flow-through channel would be created by excavating the west bank of the ship channel. Is this description intended to be what is otherwise referred to as the breach in the ship channel levee? Also, the west bank of the ship channel is on the opposite side of the ship channel from Prospect Island.

- P. 37, second paragraph, first sentence says the breach on the ship channel "allows." To our knowledge, there is no existing breach on the ship channel.

- P. 37, second paragraph, second sentence refers to a 1-year establishment period. The non-Federal sponsor recently requested a longer establishment period.

- P. 37, first bullet says the breaches would be sized so that they would not require rock revetment. This statement appears to be somewhat inconsistent with the previous paragraph, which says the ship channel breach would be "armored during the 1-year establishment period."

- P. 37, Islands, second bullet says fill material is available on the Port property. Has the Port committed to make this material available for the project?

- P. 37, last bullet refers to a side channel and dead-end slough. These features do not appear to be shown on plate 3.

- P. 41, figure 10 is labeled as "Barrier Island Section." This term is not used in the text, so its use in the figure is somewhat confusing.

- P. 42, first paragraph, sentence that refers to figure 9 cites a 10-foot-wide bench, but the figure shows a 20-foot bench.

- P. 42, first paragraph, sentence that begins on line 9 refers to “a peninsula” and “peninsulas.” These should be identified on plate 4.
- P. 43, second bullet refers to “breaches” along the ship channel levee. Plate 4 shows only one breach on this levee.
- P. 43, Channels, first bullet refers to a “3-foot-deep side channel.” This side channel does not appear to be identified on plate 4.
- P. 43, Alternative 5, says alternative 5 is “very similar” to alternative 4 except for the Miner Slough breach location. What is the dashed double line on plate 5? Does the large excavated channel become a dead-end slough at the north end (at the Miner Slough levee)? What about the other small channels? (In Alternative 4 also.) Where is the side channel? All features of this alternative should be clearly identified on the plate.
- P. 44, third paragraph refers to the proposed channel “through the center of the site for alternative 5 connecting the two breaches.” This description is not consistent with the features as shown on plate 5.
- P. 45, table 4 lists for alternative 3 a first cost per AAHU of \$8,561. However, this cost does not appear to be correct based upon the AAHU net gain of 821.6 from table 5.
- P. 46, paragraph at bottom of page says the Service plans to operate and manage Prospect Island as a national wildlife refuge on behalf of DWR. As we understand it, Prospect Island is intended to be part of a new national wildlife refuge (that would also include Little Holland Tract and Liberty Island). Upon completion of the project, Reclamation would transfer to the Service the management responsibility for the land Reclamation previously acquired.
- P. 47, first paragraph discusses annual administrative costs of \$40,000 and annual O&M costs for alternative 5 of \$70,000. It is not clear whether the \$40,000 is separate from or part of the \$70,000.
- P. 47, second paragraph says that inclusion of the privately owned parcel (Stringer property) in the project would eliminate the need to maintain the levee access road. However, as discussed at recent team meetings, acquisition of the Stringer property is not being pursued as part of this project.
- P. 47, fourth paragraph discusses possible recreation opportunities. The Service should be consulted about the potential for recreation, including any canoeing, kayaking, and fishing opportunities.
- P. 47, last paragraph says that the study area is currently farmed and that removing this land from agricultural production would eliminate the use of agricultural chemicals on the site. The island is not currently farmed.
- P. 48, second paragraph, next to last sentence says that the average annual cost per habitat unit for alternative 3 is \$3,758 more than for alternative 5. Based upon the information in table 4, this difference is much less, only \$292.
- P. 48, third paragraph refers to “more significant potential adverse effects.” If the project is expected to result in significant effects, than an EIS will be required.
- P. 48, fourth paragraph, second and third sentences refer to additional detail in the EA/IS (appendix C) and an impact of reducing the amount of freshwater outflow and increasing saltwater outflow; however, we did not find a discussion of this impact in the EA/IS.

- P. 50, second full paragraph, last two sentences discuss potential impacts on water supply and note that the Service's 1994 biological opinion requirements "will be reviewed" and "Therefore, pumping would not be adversely affected by this project." It is unclear how a review of the requirements of the opinion could ensure no restrictions or adverse effects on pumping.

Also, is this the same biological opinion (March 6, 1995) referred to on p. 14?

- P. 50, fourth full paragraph discusses levee erosion. Results of sonar studies conducted by Reclamation in connection with the Prospect Island levee repairs along Miner Slough showed no erosion damage to the Ryer Island levee, even 6 months after the Prospect Island levee break.

- P. 50, last paragraph discusses seepage. Except for the reference in the first sentence to Ryer Island farmers, this is the only recognition in the main report of the two lawsuits filed by Ryer Island landowners against Reclamation for damages they claim resulted from flooding of Prospect Island. The discussion of any potential seepage must be carefully considered and should be coordinated between the appropriate technical staffs at the Corps and at Reclamation.

Chapter V:

- P. 53, second paragraph says no significant adverse effects have been determined for the plan. However, statements on pages 48 and 50 suggest there may be some significant adverse effects.

- P. 53, third paragraph, next to last sentence suggests that plans and specifications have been completed. It is our understanding that plans and specifications are to be undertaken following approval of the PMR.

- P. 53, fourth paragraph says "... it is recommended that DWR or another agency pursue construction of the northern breach." Responsibilities related to potential later construction of a northern breach should be fully addressed in the PMR and coordinated with all potentially affected agencies and other interests.

- P. 53, last paragraph discusses non-Federal responsibilities for monitoring. The report should clarify agency responsibilities and duration of the establishment period and how these may differ from the monitoring responsibilities.

- P. 55, second paragraph concludes that the proposed project will have "no adverse effect on existing flood control projects." This statement does not appear to be fully supported by the discussion of seepage on pages 50-51.

- P. 55, third paragraph briefly discusses planned levee repairs by Reclamation and the Port. We have completed our repair of the Prospect Island (Miner Slough) levee breach on Reclamation land (November 1997). To our knowledge, the Port has not committed to permanently repair its breaches along Miner Slough, and certainly not in 1997.

- P. 56, last paragraph, third sentence discusses soil explorations planned by the Corps. Reclamation questions the value of this proposed work. (See attached set of comments.)

Chapter VII:

- P. 59, third paragraph, second sentence should be revised to make clear that Prospect Island is bordered on the east by Miner Slough, that the Prospect Island levee along the slough is not a "project" flood control levee, but that the Ryer Island levee along the slough is.

- P. 60, second paragraph, last sentence says that Reclamation would construct temporary repairs to the Miner Slough breach prior to project construction. As noted above, these levee repairs have been completed.
- P. 60, third paragraph says that DWR, the non-Federal sponsor, would provide the real estate requirements needed to implement the project. It should be noted that the Federal Government (through Reclamation) holds title to the northern portion of the island, which is the land the Corps proposes to restore for environmental purposes. The land will not be sold or transferred to the State. Upon completion of the Corps project, Reclamation would transfer management responsibility for the land to the Fish and Wildlife Service.

Plates:

Plates 1-5, near the end of the report, depict the five "study alternatives." All text descriptions of these alternatives, references to the plates, and the plates themselves should be carefully reviewed to correct inconsistencies or errors. The plates should be carefully reviewed to ensure that all features are shown and adequately labeled. Also, plate 5 should indicate that Study Alternative 5 is the proposed plan.

The five drawings at the end of the report are not labeled as plates, and we did not find references to them in the main report. These drawings should be clearly labeled.

Appendix C, Environmental Assessment/Initial Study

- General: The term "fisheries" is used numerous times throughout the document. We suggest this term be changed to "fish resources" to accurately reflect the subject matter.
- P. 6, section 2.1.4, last sentence is unclear. To which alternative(s) does the statement "less material would be moved and ..." refer?
- P. 15, section 4.1.1, should be clarified to indicate that the project site flooded in January 1997 (instead of winter 1997), that repair of the Miner Slough levee breach has been completed, and that repair of the cross levee and dewatering of the island are expected to be done in the summer or fall of 1998 (not 1997).
- P. 20, section 4.2.2, second paragraph reference to "cultural agricultural land" is unclear.
- P. 24, section 4.3.1, second from last sentence, description of confluence of the Stanislaus and San Joaquin Rivers on the "southwest" corner should be changed to "southeast" corner.
- P. 35, section 4.7.1, reference in first paragraph to "electro conductivity" should be changed to "electrical" conductivity; reference in third paragraph to "chlorpyifos" should be changed to "chloropyriphos."

Appendix I. Real Estate Report

This appendix does not appear to note that approximately 80 acres of the northern portion of Prospect Island is owned by the Port of Sacramento. This land comprises a strip about 150 feet wide that extends north-south along the west side of the island adjacent to the ship channel levee. This land would be affected by the Prospect Island project proposed by the Corps.

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