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DEPARTMENT OF WATER RESOURCES

ENVIRONMENTAL SERVICES OFFICE
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SACRAMENTO, CA 95816-7017



December 1, 1997

Ms. Leslie Lew
Sacramento District
U.S. Army Corps of Engineers
1325 J Street
Sacramento, California 95814

Dear Ms. Lew:

Thank you for the opportunity to review the draft Prospect Island Project Modification Report (October 1997). Enclosed are comments compiled from environmental, legal, engineering and water quality staff at the Department of Water Resources. In general, DWR would like to see certain design specifications of the project that would provide for maximum protection of project features and minimal maintenance expenses. For example, DWR recommends that there be larger islands and more plantings to ensure protection and therefore stability of the levees. DWR also recommends that the project implementation period include an extended construction period to provide for three years of post-implementation monitoring (also described as the establishment period). The post-implementation monitoring would assure that the restoration project has established vegetation of sufficient size or maturity and created islands that will maintain stability to achieve project objectives. Because the Prospect Island Project is a pilot study for habitat restoration in tidally influenced areas, this monitoring is necessary to assure the project is meeting its objectives and will be a valuable reference for other such projects. As allowed under the Corps' 1995 Circular EC No. 1105 -2-206, Appendix A, page 18, (providing guidance for implementing Section 1135 projects), "implementation" may include such monitoring to help determine if there is a need to correct the project if it is not meeting its objectives. Such corrections would be cost shared by the Corps and DWR pursuant to the Project Cooperation Agreement. In addition, the PMR should clarify that the Project will not significantly impact dredging of the Sacramento Deep Water Ship Channel adjacent to Prospect Island and the Corps will continue to have full responsibility for dredging of the channel under its existing authorities.

In a separate but related program, DWR proposes to convene an Interagency Ecological Program Project Work Team to conduct monitoring of water, wildlife, and habitat parameters on Prospect Island. This team will ensure coordination between the different monitoring elements of DWR's proposed monitoring plan and Project post-implementation monitoring. A description of this proposed monitoring by the Prospect Island Interagency Ecological Program Project Work Team should be included in the Project Modification Report.

Ms. Leslie Lew
December 1, 1997
Page Two

I have also enclosed updated Prospect Island water quality data, a copy of the Proposed Negative Declaration, and updated outlines for the DWR monitoring program for you to include in the final version of the Project Modification Report. If you have any questions, please call me at (916) 227-7548 or Collette Zemitis of my staff at (916) 227-7620.

Sincerely,



Leo Winternitz, Chief
Monitoring and Analysis Branch

Enclosures (4)

cc: Mr. Walt Hoye
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