



May 18, 2020

Governor's Office of Planning & Research

Mr. Tim Keeseey
Butte County Resource Conservation District
150 Chuck Yeager Way, Suite A
Chico, California 95965

MAY 19 2020

STATE CLEARINGHOUSE

Subject: Big Chico Creek Forest Health Restoration Project Initial Study/Mitigated
Negative Declaration, SCH No. 2020040195

Dear Mr. Keeseey:

This letter confirms our conversation on Monday, May 18, 2020 regarding the Cal OES comments on the subject document, the Butte County Resource Conservation District (BCRCD) California Environmental Quality Act (CEQA) Notice of Completion (NOC) and Initial Study/Mitigated Negative Declaration (IS/MND) for the Butte County Fire Safe Council (BCFSC) Big Chico Creek Forest Health Restoration Project (project). Cal OES understands the importance of the proposed fuel reduction project in the unincorporated Forest Ranch community in Butte County west of the Camp Fire Burn Area along State Route 32.

CEQA requires an Initial Study (IS) to look at all phases of the project, including planning, implementation, and operation. Description of these project phases are absent from IS Project Description and Environmental Setting section and a discussion of where the work will occur. In addition, the document omits a technical analysis from which the recommended mitigation measures, to reduce "potentially significant impacts" to "less than significant with mitigation incorporated," are derived that render the CEQA document a "Mitigated Negative Declaration (MND)". We recommend that such descriptions be developed and added to the IS/MND for completeness, with a project schedule.

Because of the omission of project maps in the document, we developed the two attached maps to understand the 1,500-acre project area. From these, it appears the project area encompasses the densely forested, unincorporated community of Forest Ranch, and public lands. The IS/MND neither summarizes an operation plan nor a map that depicts land ownership, targeted ladder fuel areas, designated vegetative debris collection and burn areas. These data, in relation to other resource features (e.g., waters of the state, special status species), are important to understand the potential environmental impacts associated with the project. Therefore, we

recommend that these data be developed for inclusion in the IS/MND on a 7.5-minute U.S.G.S. quad base that illustrates lands in private and public ownership. The benefit of developing this information include understanding the: 1) MND analyses and mitigation measures, 2) necessary rights of entry (ROE) for property access, and 3) identification of the required environmental permit requirements from local, state, and federal resource agencies for project operation.

We understand that the BCRCD is the CEQA lead agency, in accordance with the California Native American Historic Resource Protection Act. We noticed that the IS/MND Cultural Resources section omitted reference to a project specific California Historical Resource Information System (CHRIS) report and a statement of intent to obtain one. We recommend that the BCRCD develop a project CHRIS because the project will entail ground-disturbing activities that the local Native American Tribe representatives may wish to monitor for the BCFSC.

Please be aware that if a portion of project funding is from a federal source, the project may also be subject to the National Environmental Policy Act (NEPA). In such a case, the NEPA lead agency would be responsible for Native American Tribe and resource agency consultations.

In closing, be advised that Cal OES is also concurrently reviewing the CAL FIRE Prescribed Fire Program, Unit 7 Project IS/MND, SCH #2020040374 for which the BCRCD is the CEQA lead agency. The 322-acre CAL FIRE and Forest Health Restoration projects are adjacent along Musty Buck Ridge. The timing of each project's implementation and operation may require analysis as a single project under CEQA to prevent the piecemealing, or segmenting, as there is a potential for cumulative impacts to air quality and wildfire safety with the proposed use of prescribed burns to reduce vegetative debris from both projects.

We appreciate the opportunity to be of assistance to you. If you have any questions about these comments, please contact me at (916) 823-1945 or by email to patricia.nelson@caloes.ca.gov.

Sincerely,


Patricia Nelson
Environmental Officer

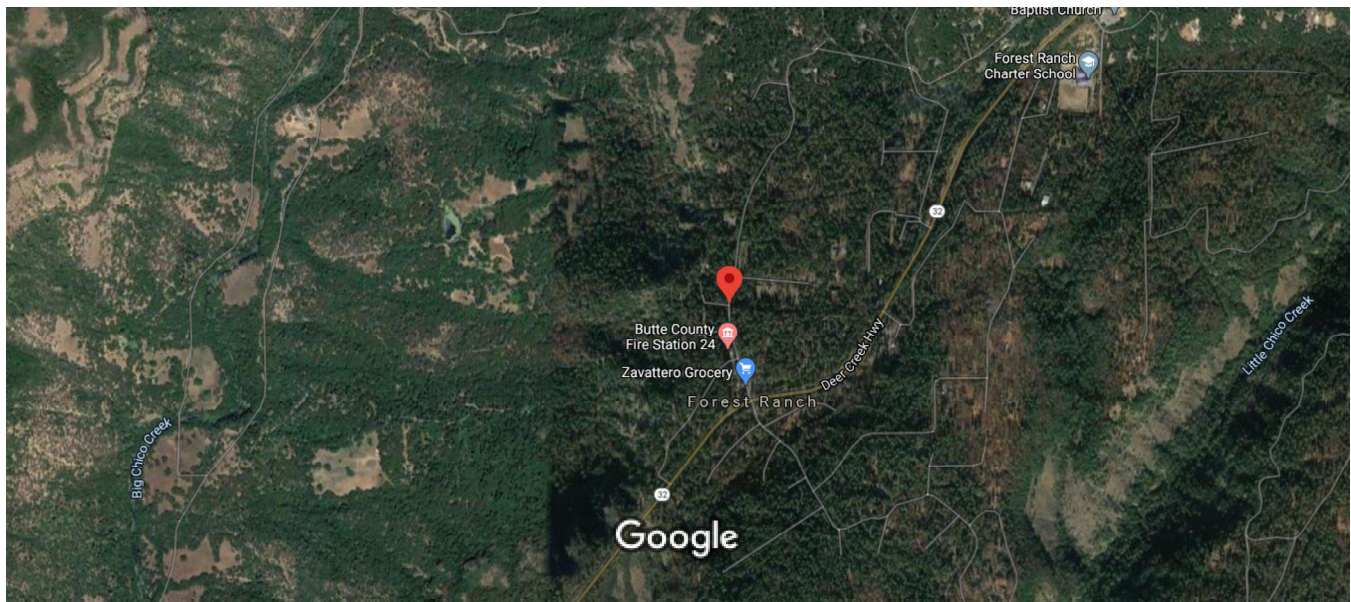
cc: State Clearinghouse





Nopel Rd Satellite Map

Big Chico Creek Forest Health Restoration Project



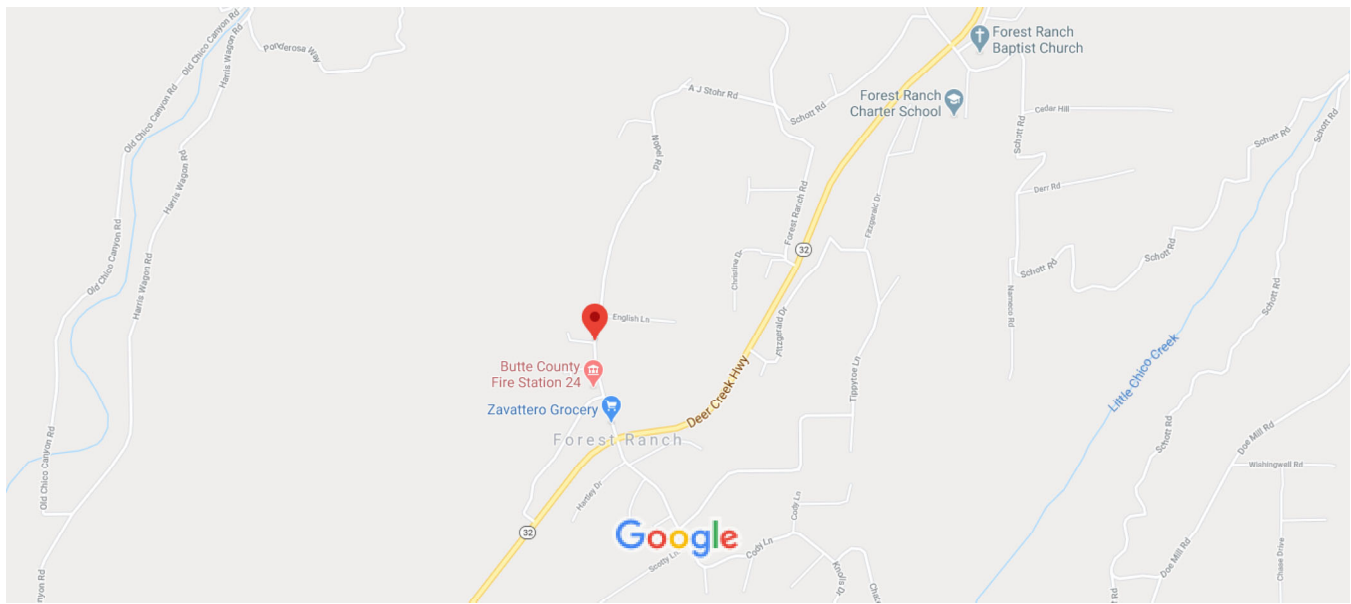
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1000 ft



Nopel Rd - Street Image

Big Chico Creek Forest Restoration Project



Map data ©2020 1000 ft