



May 22, 2020

Governor's Office of Planning & Research

MAY 22 2020

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

STATE CLEARINGHOUSE

Subject: Big Chico Creek Ecological Reserve Prescribed Fire Program, Unit 7 Project
Initial Study/Mitigated Negative Declaration, SCH No. 2020040374

Dear Mr. Keeseey:

This letter contains Cal OES comments on the California Environmental Quality Act (CEQA) Notice of Completion (NOC) and Initial Study/Mitigated Negative Declaration (IS/MND) for the Big Chico Creek Ecological Reserve (BCCER) Prescribed Fire Program, Unit 7 Project (project). We understand that the California Department of Forestry and Fire Protection (CAL FIRE) is the lead agency for the project, and that Butte County Resource Conservation District (BCRCD) is to receive comments on IS/MND.

The BCCER project is adjacent and west of the BCRCD Big Chico Creek Forest Health Restoration Project (IS/MND SCH No. 2020040195), a proposed fuel reduction project. Both projects are located about 10 miles north of Chico, proximate to the unincorporated Forest Ranch community, and along State Route 32 west of the Camp Fire Burn Area. The 322-acre CAL FIRE and 1500-acre BCRCD projects are along Musty Buck Ridge within the BCCER, which is owned by Chico State Enterprises, a not for profit auxiliary organization of California State University, Chico. We suggest that the land ownership, surface features, and each project's boundaries be added to the attached BCCER map and include it in the IS/MND for reference.

CEQA requires an Initial Study (IS) to look at all phases of the project, including planning, implementation, and operation. Descriptions of these phases and an illustration of where the work will occur are absent from IS Project Description and Environmental Setting section. The subject document also omits a technical analysis from which the all 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 detailed project schedule.

Two of the Appendices, B and C, contain, respectively, a Wildlife Survey and Botanical Survey. We recommend in the former, Appendix B, and the IS/MND be revised to

address the Eastern Tehama Blacktail Deer, the largest migratory herd in California, whose winter range includes the Big Chico Creek Watershed. This is because the proposed work and hunting season for the deer may occur on the BCCER perhaps concurrently. Also, we recommend that the IS/MND be updated to address potential for Waters of the State/U.S. to be impacted by the project, notably the springs, ephemeral creek drainages and vernal seeps noted in Appendix C. If this information were added, a map could illustrate the project areas in relation to the tributaries to the Mud Creek East Fork (itself a tributary to the Sacramento River) that may be impacted by sedimentation resulting from the prescribed burns.

We recommend that these data be developed for the revised IS/MND on a 7.5-minute U.S.G.S. quad base. 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 beyond those identified in the IS/MND (e.g., water quality).

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.

Cumulative impacts to air quality, water quality, and wildfire safety may occur because each project's prescribed burns are scheduled for the fall. Therefore, we recommend one impact assessment for both projects to prevent the perception of the projects being piecemealed, or, segmented, which is prohibited under CEQA.

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
CAL FIRE



Big Chico Creek Reserve

Hunt Program Parking Areas A & B

