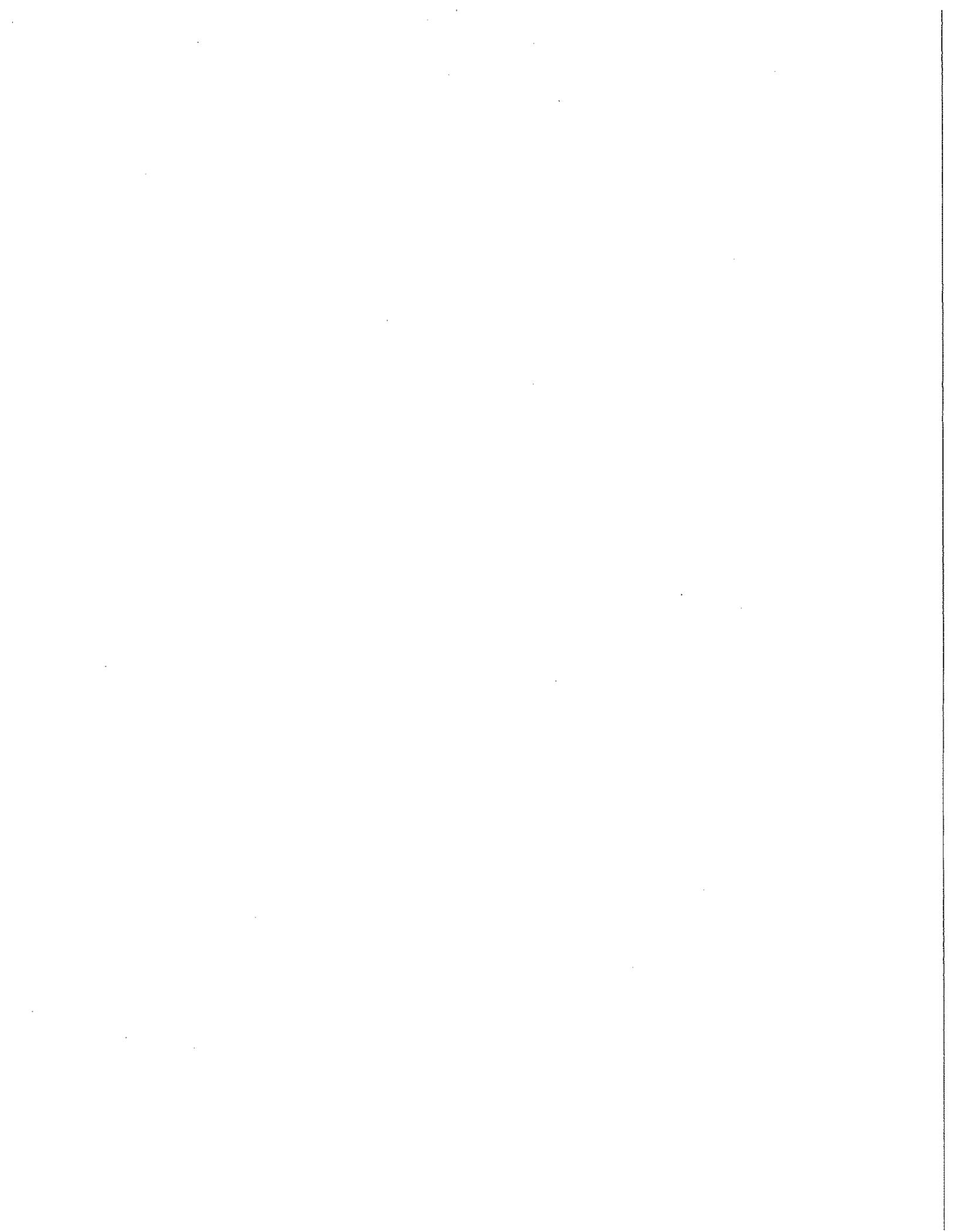


# AGENCIES



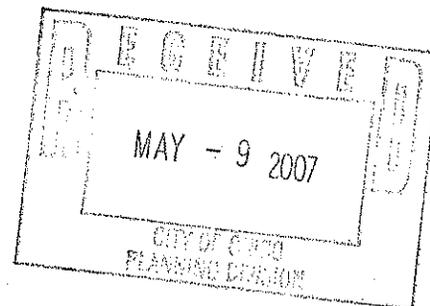
## DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 942360001  
(916) 653-5791



May 7, 2007

Brendan Vieg, Senior Planner  
City of Chico  
Post Office Box 3440  
Chico, California 95927



Bidwell Park Master Management Plan Update  
State Clearinghouse (SCH) Number: 2004102045

The project corresponding to the subject SCH identification number has come to our attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at <http://recbd.ca.gov/>. Please be advised that your county office also has copies of the Board's designated floodways for your review. If indeed your project encroaches on an adopted food control plan, you will need to obtain an encroachment permit from the Reclamation Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires the securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly.

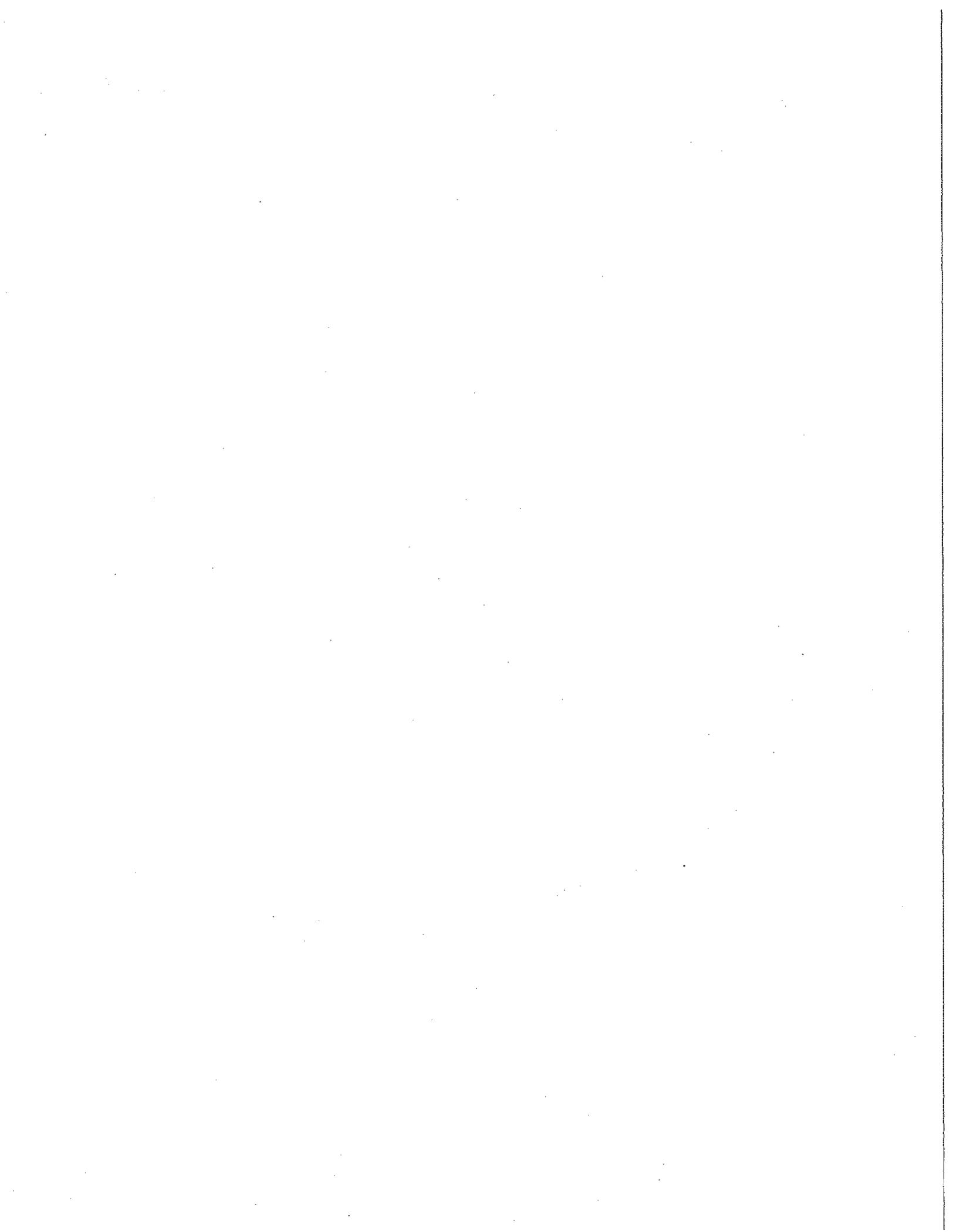
If after careful evaluation, it is your assessment that your project is not within the authority of the Reclamation Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Huitt".

Christopher Huitt  
Staff Environmental Scientist  
Floodway Protection Section

cc: Governor's Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, CA 95814



## Encroachment Permits Fact Sheet

### **Basis for Authority**

State law (Water Code Sections 8534, 8608, 8609, and 8710 – 8723) tasks the Reclamation Board with enforcing appropriate standards for the construction, maintenance, and protection of adopted flood control plans. Regulations implementing these directives are found in California Code of Regulations (CCR) Title 23, Division 1.

### **Area of Reclamation Board Jurisdiction**

The adopted plan of flood control under the jurisdiction and authority of the Reclamation Board includes the Sacramento and San Joaquin Rivers and their tributaries and distributaries and the designated floodways.

Streams regulated by the Reclamation Board can be found in Title 23 Section 112. Information on designated floodways can be found on the Reclamation Board's website at [http://recbd.ca.gov/designated\\_floodway/](http://recbd.ca.gov/designated_floodway/) and CCR Title 23 Sections 101 - 107.

### **Regulatory Process**

The Reclamation Board ensures the integrity of the flood control system through a permit process (Water Code Section 8710). A permit must be obtained prior to initiating any activity, including excavation and construction, removal or planting of landscaping within floodways, levees, and 10 feet landward of the landside levee toes. Additionally, activities located outside of the adopted plan of flood control but which may foreseeable interfere with the functioning or operation of the plan of flood control is also subject to a permit of the Reclamation Board.

Details regarding the permitting process and the regulations can be found on the Reclamation Board's website at <http://recbd.ca.gov/> under "Frequently Asked Questions" and "Regulations," respectively. The application form and the accompanying environmental questionnaire can be found on the Reclamation Board's website at <http://recbd.ca.gov/forms.cfm>.

### **Application Review Process**

Applications when deemed complete will undergo technical and environmental review by Reclamation Board and/or Department of Water Resources staff.

### **Technical Review**

A technical review is conducted of the application to ensure consistency with the regulatory standards designed to ensure the function and structural integrity of the adopted plan of flood control for the protection of public welfare and safety. Standards and permitted uses of designated floodways are found in CCR Title 23 Sections 107 and Article 8 (Sections 111 to 137). The permit contains 12 standard conditions and additional special conditions may be placed on the permit as the situation warrants. Special conditions, for example, may include mitigation for the hydraulic impacts of the project by reducing or eliminating the additional flood risk to third parties that may caused by the project.

Additional information may be requested in support of the technical review of

your application pursuant to CCR Title 23 Section 8(b)(4). This information may include but not limited to geotechnical exploration, soil testing, hydraulic or sediment transport studies, and other analyses may be required at any time prior to a determination on the application.

#### Environmental Review

A determination on an encroachment application is a discretionary action by the Reclamation Board and its staff and subject to the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.). Additional environmental considerations are placed on the issuance of the encroachment permit by Water Code Section 8608 and the corresponding implementing regulations (California Code of Regulations – CCR Title 23 Sections 10 and 16).

In most cases, the Reclamation Board will be assuming the role of a “responsible agency” within the meaning of CEQA. In these situations, the application must include a certified CEQA document by the “lead agency” [CCR Title 23 Section 8(b)(2)]. We emphasize that such a document must include within its project description and environmental assessment of the activities for which are being considered under the permit.

Encroachment applications will also undergo a review by an interagency Environmental Review Committee (ERC) pursuant to CCR Title 23 Section 10. Review of your application will be facilitated by providing as much additional environmental information as pertinent and available to the applicant at the time of submission of the encroachment application.

These additional documentations may include the following documentation:

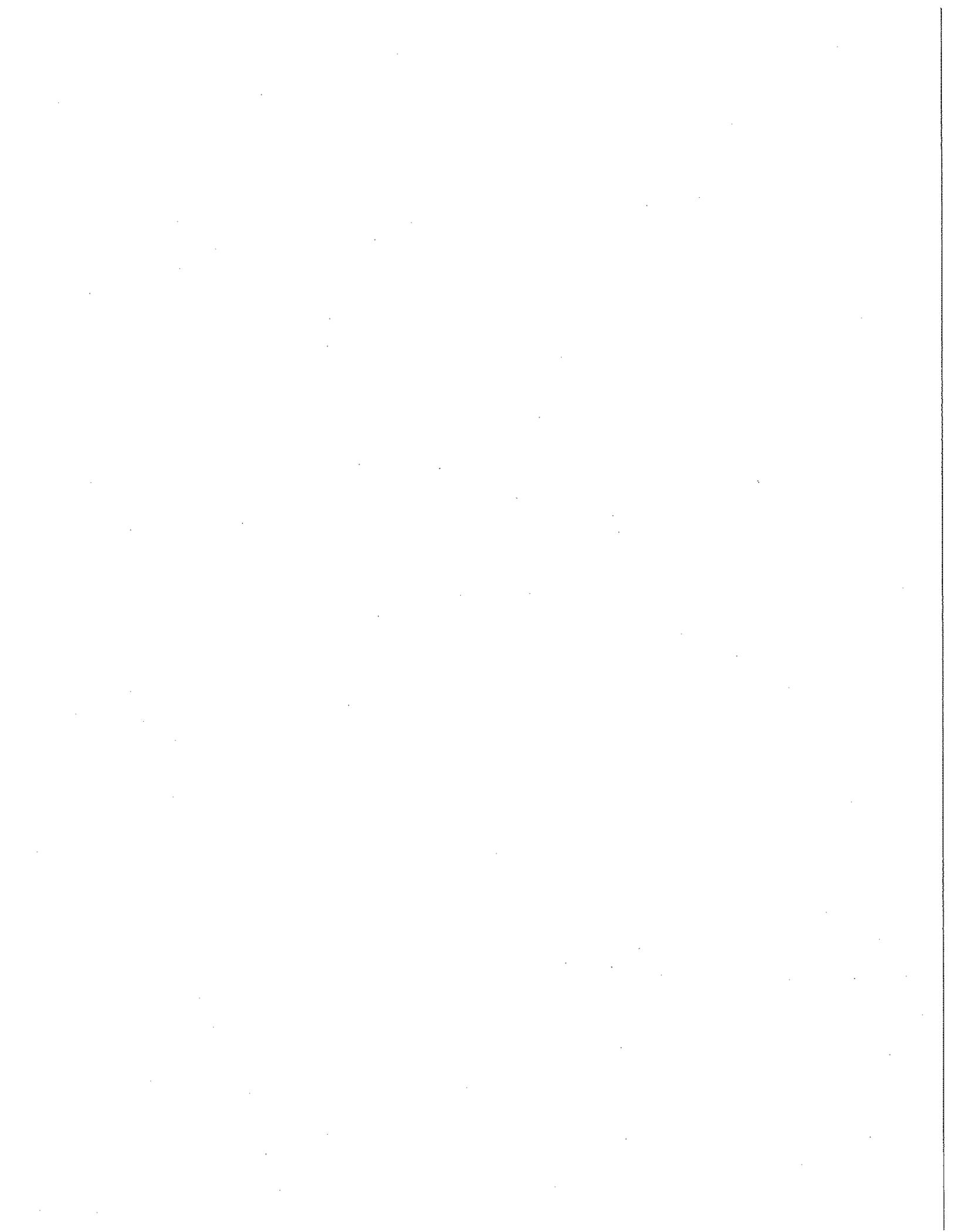
- California Department of Fish and Game Streambed Alteration Notification (<http://www.dfg.ca.gov/1600/>),
- Clean Water Act Section 404 applications, and Rivers and Harbors Section 10 application (US Army Corp of Engineers),
- Clean Water Act Section 401 Water Quality Certification, and
- corresponding determinations by the respective regulatory agencies to the aforementioned applications, including Biological Opinions, if available at the time of submission of your application.

The submission of this information, if pertinent to your application, will expedite review and prevent overlapping requirements. This information should be made available as a supplement to your application as it becomes available. Transmittal information should reference the application number provided by the Reclamation Board.

In some limited situations, such as for minor projects, there may be no other agency with approval authority over the project, other than the encroachment permit by Reclamation Board. In these limited instances, the Reclamation Board

may choose to serve as the "lead agency" within the meaning of CEQA and in most cases the projects are of such a nature that a categorical or statutory exemption will apply. The Reclamation Board cannot invest staff resources to prepare complex environmental documentation.

Additional information may be requested in support of the environmental review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include biological surveys or other environmental surveys and may be required at anytime prior to a determination on the application.



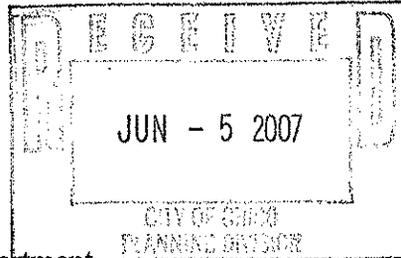


## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Sacramento Fish and Wildlife Office  
2800 Cottage Way, Room W-2605  
Sacramento, California 95825-1846

In reply refer to:  
1-1-07-TA-1019



JUN 1 2007

Brendan Vieg  
City of Chico Planning Services Department  
411 Main Street - 2<sup>nd</sup> Floor  
PO Box 3420  
Chico, CA 95927

Subject: Bidwell Park Master Management Plan, Chico, Butte County

To Whom It May Concern:

This is in response to your March 21, 2007, request for comment on the referenced project, for which your agency is currently seeking comments on the Draft Environmental Impact Report. Unfortunately, due to constraints on our funds and staff within our Endangered Species Program, we are unable to take action on your request at this time. However, other programs in our Service may wish to provide a response to you apart from endangered species issues. You may wish to consult with the local regional office of the California Department of Fish and Game and/or their Sacramento Office Natural Diversity Database (916/322-2493) for information on the possible occurrence of Federal or State listed species. You should also review your responsibilities under the California Endangered Species Act.

Our inability to review your request does not relieve you of your obligation to ensure compliance with Section 9 of the Federal Endangered Species Act (Act), which prohibits the taking of any federally-listed species. As defined by the Act, take means "...to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." Harass is defined by the Service as an intentional or negligent act or omission which creates the likelihood of injury to a listed species by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering. Harm is defined by the Service to include significant habitat modification or degradation that results in death or injury to listed species by impairing behavioral patterns including breeding, feeding, or sheltering. The applicant should conduct appropriate surveys to determine if federally listed animal or plant species inhabit the proposed site and are likely to be taken as a result of project implementation.

TAKE PRIDE  
IN AMERICA 

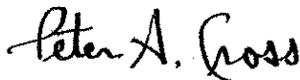
Should you determine that your project may result in take or may adversely affect a listed species, and should there be a Federal agency involved with permitting or funding this project, initiation of formal Section 7 consultation with this office pursuant to Section 7 of the Endangered Species Act of 1973, as amended, will be required. Such consultation would result in a Biological Opinion rendered by the U.S. Fish and Wildlife Service that addresses effects to listed species.

Should a Federal agency not be involved with this project, an "Incidental Take Permit" authorizing such take must be obtained pursuant to Section 10(a) of the Endangered Species Act before any taking can lawfully occur. Such a permit authorizes take of threatened or endangered species incidental to otherwise lawful activities. Issuance of a Section 10(a) permit is contingent upon submission of an acceptable habitat conservation plan detailing the amount of take, the impacts of this take, mitigation measures the applicant will implement to offset the impacts of the anticipated take, and funding mechanisms to insure implementation of the mitigation measures.

Should federally listed species possibly be taken by the proposed project, please contact this office for additional guidance on compliance requirements of the Endangered Species Act. Thank you for your concern for endangered species and compliance with the Act.

Please contact the Acting Sacramento Valley Branch Chief of my staff at (916) 414-6645, if you have questions regarding this response for the Bidwell Park Master Management Plan.

Sincerely,



Peter A. Cross  
Chief, Endangered Species Division

**From:** "Jenny Marr" <JMarr@dfg.ca.gov>  
**To:** <bviieg@ci.chico.ca.us>  
**Date:** 6/26/2007 4:46:39 PM  
**Subject:** BPMMP DEIR comments

June 25, 2007

Mr. Brendan Vieg, Senior Planner  
City of Chico  
Planning Department 411 Main Street  
Chico, CA 95927

The Department of Fish and Game would like to contribute the following comments on the City of Chico Draft Environmental Impact Report for the Bidwell Park Master Management Plan Update, SCH # 2004102025. These comments are provided by the Department pursuant to legislated authority as the Trustee Agency for the resources, the California Endangered Species Act and the California Environmental Quality Act, and shall constitute written comments by the Department.

The Department recognizes the many improvements made to the park management plan and commends the City on the recent hiring of a Volunteer Coordinator for the Park. We appreciate the opportunity to provide comments on the Draft management plan and provide the following comments primarily relating to natural resources, sensitive resources and to chapter E4, the Environmental Impacts chapter, and specifically Section E4.3.3 Biological Resources. The analysis in this section pertains to the environmental impacts potentially resulting from implementation of the four projects proposed as part of the implementation of the park management plan.

The plan does not appear to identify a strategy for a comprehensive resource inventory assessment, other than a very long range conceptual item, that includes surveys for and identification of populations of special status species within the 4000 acre park. Effective long term management of the park's sensitive resources would benefit from prioritization of this effort to catalogue and map all sensitive resources and establish a baseline database, rather than as the plan states, require more in depth biological surveys for sensitive species for each the project, and then work around them. Recognizing that a comprehensive mapping and inventory of sensitive resources is labor, time and cost intensive, and the proposed projects may be implemented before such an inventory may be completed, the parks sensitive resources are not fully known at this time and this baseline data is needed. Additionally without a comprehensive inventory of the sensitive resources the anticipated expansion of public uses and the proposed projects may result in significant indirect or commutative effects (pursuant to CEQA) in spite of potential efforts to re-design them to avoid direct impacts to sensitive resources.

Appendix E7 Mitigation Measures (BIO): Mitigation measures for potential impacts where the species is State-listed may necessitate consultation with DFG and an incidental take permit pursuant to Fish and Game Code 2081 (b). The mitigation measure as described suggest the measures would be implemented to the extent feasible which does not meet the Fully Mitigated standard required by the statute. The language in the mitigation measures, which will guide actions the park would use, should be corrected to be consistent with Fish and Game Code and the California Endangered Species Act standards

BIO 2d(3) Protect Burrowing owl: The measures as described will avoid take but do not address conservation or protection of nest burrows or replacement burrows for those that may be closed to build a project. The Department advises that where owl burrows are closed and the owls are displaced that the City include a program for establishing artificial burrows in protected areas that either exclude public access (dogs) or that can be actively protected with fencing to preclude human and animal harassment.

BIO 2d(1) Protection of nesting raptors; Nesting raptors in the park may have different disturbance tolerance depending on the location and age of the breeding pair. A 500 foot buffer may be suitable in lower park but a larger buffer may be advisable for ground nesting birds of the grasslands or for the more

remote portions of upper park.

In general where direct or indirect impacts to special status or State-listed species or habitats will result from the proposed projects the DFG recommends that the city take direct actions to restore habitat at a 2:1 ratio to the impact and where feasible provide permanently protected area where the public and their dogs will be excluded. The mitigation measures rarely mention replacement habitat or restoration of degraded habitat, although this concept is discussed in other sections, for impacts to special status species that may occur due to the proposed projects, however, this may become an important management tool and should become the standard for incorporating into the mitigation measures in addition to avoidance of direct take.

The plan in general acknowledges that each project will individually comply with CEQA and CESA by providing additional species and habitat impact analysis and project specific avoidance and minimization measures, however, the plan falls short of discussing how actual mitigation for the loss of habitat will be compensated. Habitat impacts resulting from direct and indirect effects should be analyzed under CEQA and reduced to below the level of significance. Without addressing compensation measures for the habitat impacts the plan falls short of this condition. Examples of this include the analysis of indirect effects to breeding raptors in the proposed disc golf project due to indirect effects relating to humans, in particular the indirect effects to the Peregrine falcon nest during the breeding season. The document speaks only to the direct project construction activities and does not mention the indirect effects of the project upon completion which may result in abandonment of that nest roost.

The project also discusses numerous project impacts relating to the construction of the disc golf course and dismisses impacts that are significant pursuant to CEQA by referring to them as project "improvements". In particular, construction of permanent posts for the course may reduce direct impacts to the oak trees in the course, however, the direct impacts associated with the permanent nature of the posts, constitutes a direct impact which cumulatively analyzed for the entire project results in a permanent impact on the site. Impacts of this nature to be reduced to below the level of significance need to provide, in addition to the included avoidance and minimization measures, compensation or protection of other areas.

The plan does not adequately describe how the indirect and cumulative impacts to the oak woodlands affected by the Disc Golf Course Project will be mitigated. The Department recommends that in addition to mitigating direct loss of oaks that may be removed, an active planting plan should be developed that defines how the hundreds of oaks affected will be mitigated. The oak stands in the park have been estimated to be over 300 years old in many of the stands and planting acorns for the direct effects would only fulfill a part of the mitigation for the direct effects. The Department recommends that the City identify healthy stands in the park that may be protected permanently though additional measures to compensate for the indirect fragmentation and loss of under story in this project.

The Department would like to thank the City of for the opportunity to provide comments on the Draft Bidwell Management Plan.  
Sincerely,

Jenny C. Marr  
Staff Environmental Scientist  
California Department of Fish and Game  
North Central Region  
1100 Fortress Avenue, Suite 2  
Chico, CA 95973  
530.895.4267 Phone

## DEPARTMENT OF TRANSPORTATION

## DISTRICT 3

703 B STREET  
P. O. BOX 911  
MARYSVILLE, CA 95901-0911  
PHONE (530) 741-4025  
FAX (530) 741-5346  
TTY (530) 741-4509



*Flex your power!  
Be energy efficient!*

June 26, 2007

07BUT0024

03BUT99, PM12.65

Bidwell Park Master Management Plan Update-Draft Environmental Impact report  
(DEIR)

SCH 2004102045

Mr. Brendan Vieg, Senior Planner  
City of Chico  
411 Main Street  
Chico, CA 95928

Dear Mr. Vieg,

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Bidwell Park Master Management Plan, which is a comprehensive update of the 1990 Master Plan. This plan reflects the incorporation of an addition of 1,455 additional acres of parkland. The plan will create new baseline data for the park and will review all aspects of park functions and services. Our comments are as follows:

#### Circulation and Access

##### Section 2.4.4 Access Off State Route (SR) 32

- The DEIR states that the City of Chico is considering building a formal access point from SR 32 to the proposed disc golf course and trailhead. Currently there is "informal" access via an "abandoned right-of-way (ROW) of SR 32." Please clarify the ownership of this ROW.
- An Encroachment Permit will be required for any work conducted in the State's Right-of-Way. To secure an application, please contact Caltrans District 3 Office of Permits, at 530-741-4403.

#### Plan Objectives

Objectives O.C/A.1 and O.C/A.3 address the need for multimodal access to and within the park, while seeking the avoidance of new north-south roadways. It is Caltrans recommendation that due consideration be given to any Caltrans' plans to improve the SR 99 facilities that traverse the park.

Mr. Brendan Vieg, Senior Planner

June 26, 2007

Page 2

If you have any questions regarding these comments, please contact Matt Friedman,  
Local Development/Inter-Governmental Review Coordinator, at (530) 741-4004.

Sincerely,



SUKHVINDER (SUE) TAKHAR, CHIEF  
Office of Transportation Planning-North

**From:** "Greg Cash" <GDCash@waterboards.ca.gov>  
**To:** <bviieg@ci.chico.ca.us>  
**Date:** 6/26/2007 10:08:37 AM  
**Subject:** Comments on Bidwell Park Master Management Plan Update / Draft EIR

Bendan,

I have reviewed the Bidwell Park documents and it looks our concerns have been addressed. Here is the some general language that we send out regarding CEQA documents. You can incorporate it into your final document as needed.

**Construction Stormwater Permit:**

Based on the project description, it appears that grading or other soil disturbing activities will occur on >1 acre. In order to protect water quality during development activities, appropriate stormwater pollution controls should be implemented when construction activities occur. If construction activities result in a land disturbance of one or more acres, the project will need to be covered under the General Construction Stormwater Permit (Order No. 99 08-DWQ). The permit requires that a Stormwater Pollution Prevention Plan (SWPPP) be prepared prior to construction activities. The SWPPP is used to identify potential pollutants (such as sediment and earthen materials, chemicals, building materials, etc.) and to describe best management practices that will be employed at the site to eliminate or reduce those pollutants from entering surface waters. The Construction Stormwater Permit is administered by the State Water Resources Control Board (State Board) and the Regional Water Quality Control Boards (Regional Boards).

**Army Corps of Engineers and State Water Quality Certification:**

The proposed project may require a §404 permit from the U.S. Army Corps of Engineers and §401 Water Quality Certification from the State Board. The Federal §404 Permit is required for activities involving a discharge (such as fill or dredged material) to waters of the United States. "Waters" include wetlands, riparian zones, streambeds, rivers, lakes, and oceans. Typical activities include any modifications to these waters, such as stream crossings, stream bank modifications, filling of wetlands, etc. These projects also require a water quality certification (per Section §401 of the Clean Water Act) verifying that the project does not violate State water quality standards. If required, the §404 permit and water quality certification must be obtained prior to site disturbance. The Army Corps of Engineers contact for Butte County is Ms. Cori Nagasawa (916) 557-6605. An application for the §401 Water Quality Certification from the State Board is available from our office.

**Isolated wetlands not covered by the federal Clean Water Act:**

Wetlands not covered by the Clean Water Act are known as "isolated wetlands." Should the U.S. Army Corps of Engineers determine that isolated wetlands exist at the project site and should the project impact or have potential to impact the isolated wetlands, a Report of Waste Discharge and filing fee must be submitted prior to commencing the construction activity. The Regional Board will consider the provided information and either issue or waive Waste Discharge Requirements. Failure to obtain waste discharge requirements or a waiver thereof, when required, may result in enforcement action. Report of Waste Discharge application forms are available by calling our office at (530) 224-4845.

Thanks,  
Greg Cash

Greg Cash  
Engineering Geologist - South Regulatory Unit  
CRWQCB, Region 5 - Redding  
415 Knollcrest Drive, Suite 100  
Redding, CA 96002

Phone: (530) 224-3208

Fax : (530) 224-4857

email : [gdcash@waterboards.ca.gov](mailto:gdcash@waterboards.ca.gov)

web: <http://www.waterboards.ca.gov/centralvalley/>

\*\*\*\*\*

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

\*\*\*\*\*



ARNOLD SCHWARZENEGGER  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT  
DIRECTOR

June 27, 2007

Brendon Vieg  
City of Chico  
411 Main Street  
P.O. Box 3420  
Chico, CA 95927

Subject: Bidwell Park Master Management Plan Update  
SCH#: 2004102045

Dear Brendon Vieg:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 26, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

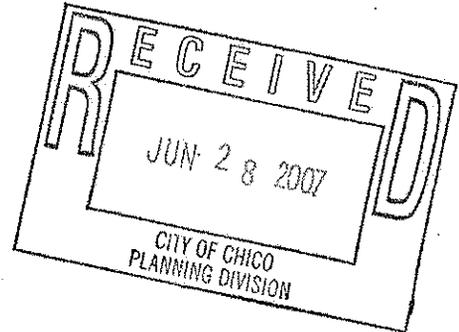
These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

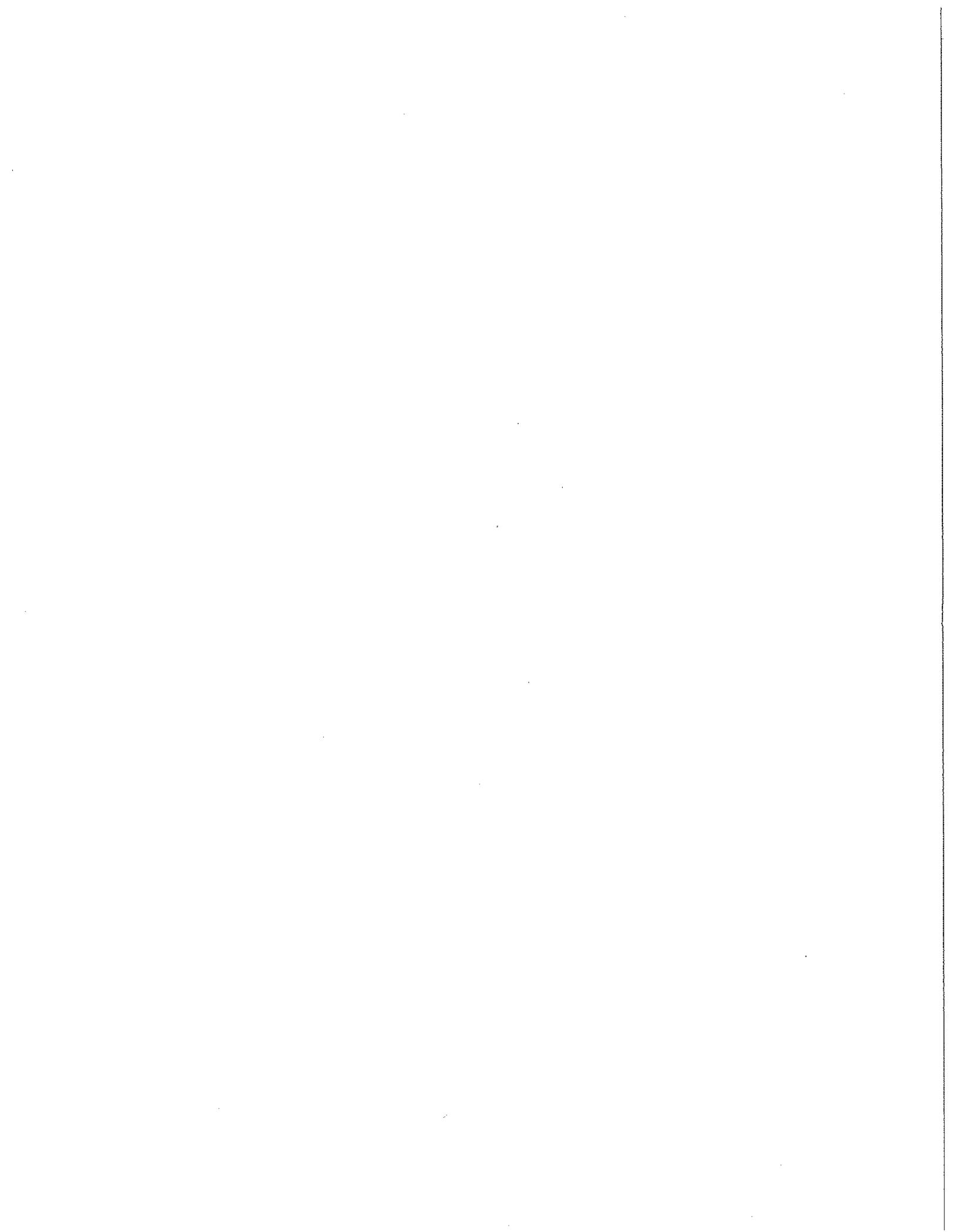
This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency





**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2004102045  
**Project Title** Bidwell Park Master Management Plan Update  
**Lead Agency** Chico, City of

**Type** EIR Draft EIR

**Description** The Bidwell Park Master Management Plan (BPMMP) update is a comprehensive update of the 1990 Master Management Plan completed for the Park. The updated BPMMP incorporates the acquisition of 1,455 acres of additional park land, updates baseline data on park resources, addresses important planning issues pertaining to management and public use of the Park, provides a venue for public input, and clarifies allowable uses in the Park. The BPMMP update also includes four site-specific Park Improvement Projects - the Trails Plan, the Horseshoe Lake Area Concept Plan, the Cedar Grove Area Concept Plan, and the Disc Golf/Trailhead Area Concept Plan. The BPMMP was developed with extensive input from a Citizen Advisory Committee formed specifically for the BPMMP update process, as well as with significant input from the Bidwell Park and Playground Commission, which is charged with oversight on issues pertaining to management of the Park.

**Lead Agency Contact**

**Name** Brendon Vieg  
**Agency** City of Chico  
**Phone** (530) 879-6806 **Fax**  
**email**  
**Address** 411 Main Street  
P.O. Box 3420  
**City** Chico **State** CA **Zip** 95927

**Project Location**

**County** Butte  
**City** Chico  
**Region**  
**Cross Streets** Bidwell Park, Northeast Chico  
**Parcel No.** Various  
**Township**

**Range** **Section** **Base**

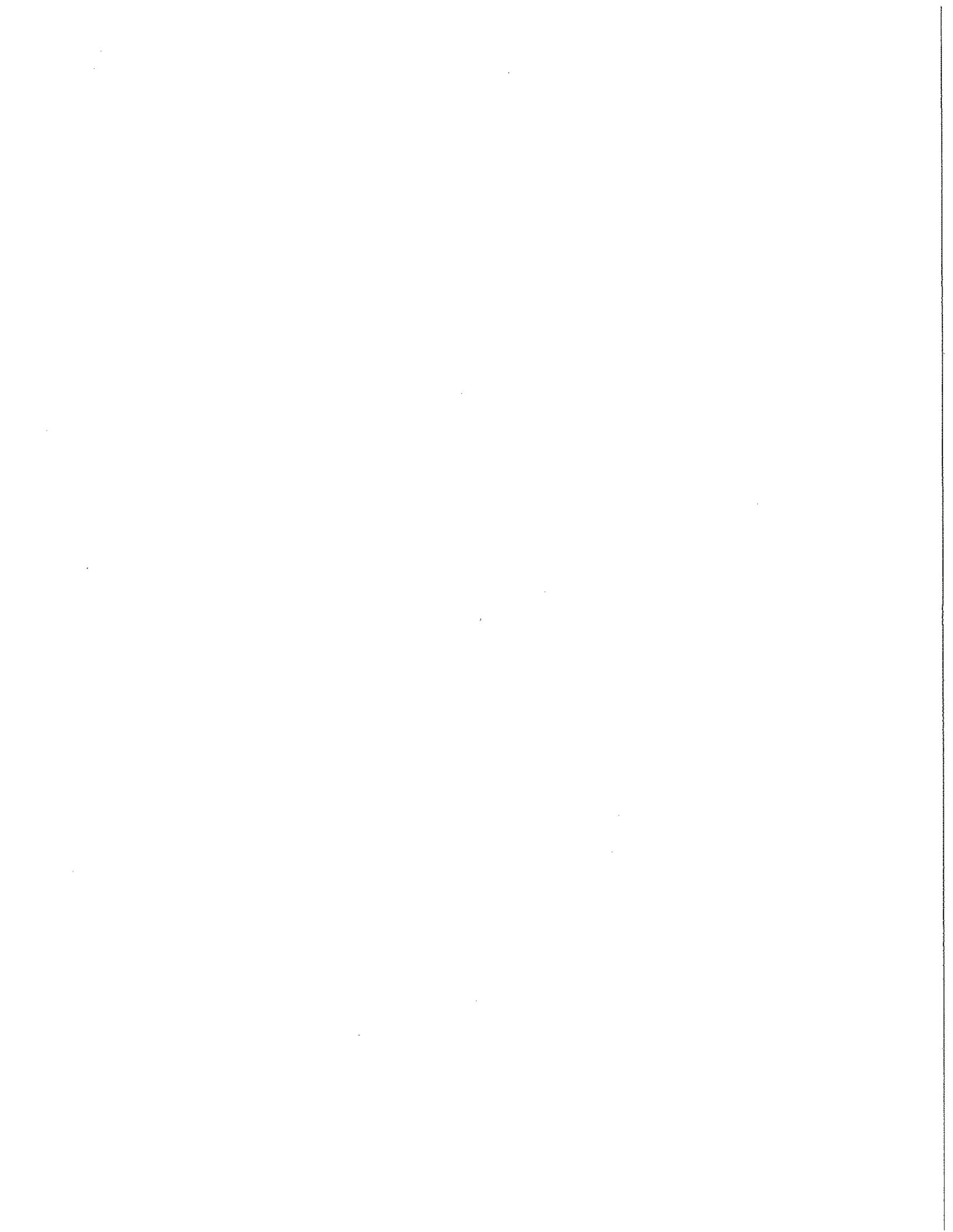
**Proximity to:**

**Highways**  
**Airports** Chico Municipal Airport  
**Railways**  
**Waterways** Big Chico Creek, Lindo Channel, Sycamore Channel  
**Schools**

**Land Use** Bidwell Park is designated Parks in the Land Use Element of the City's General Plan. In addition, nearly the entire Park is identified as a Resource Conservation Area (RCA) in the General Plan. The Park is zoned OS-1 (Primary Open Space), which is consistent with the Parks land use designation.

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

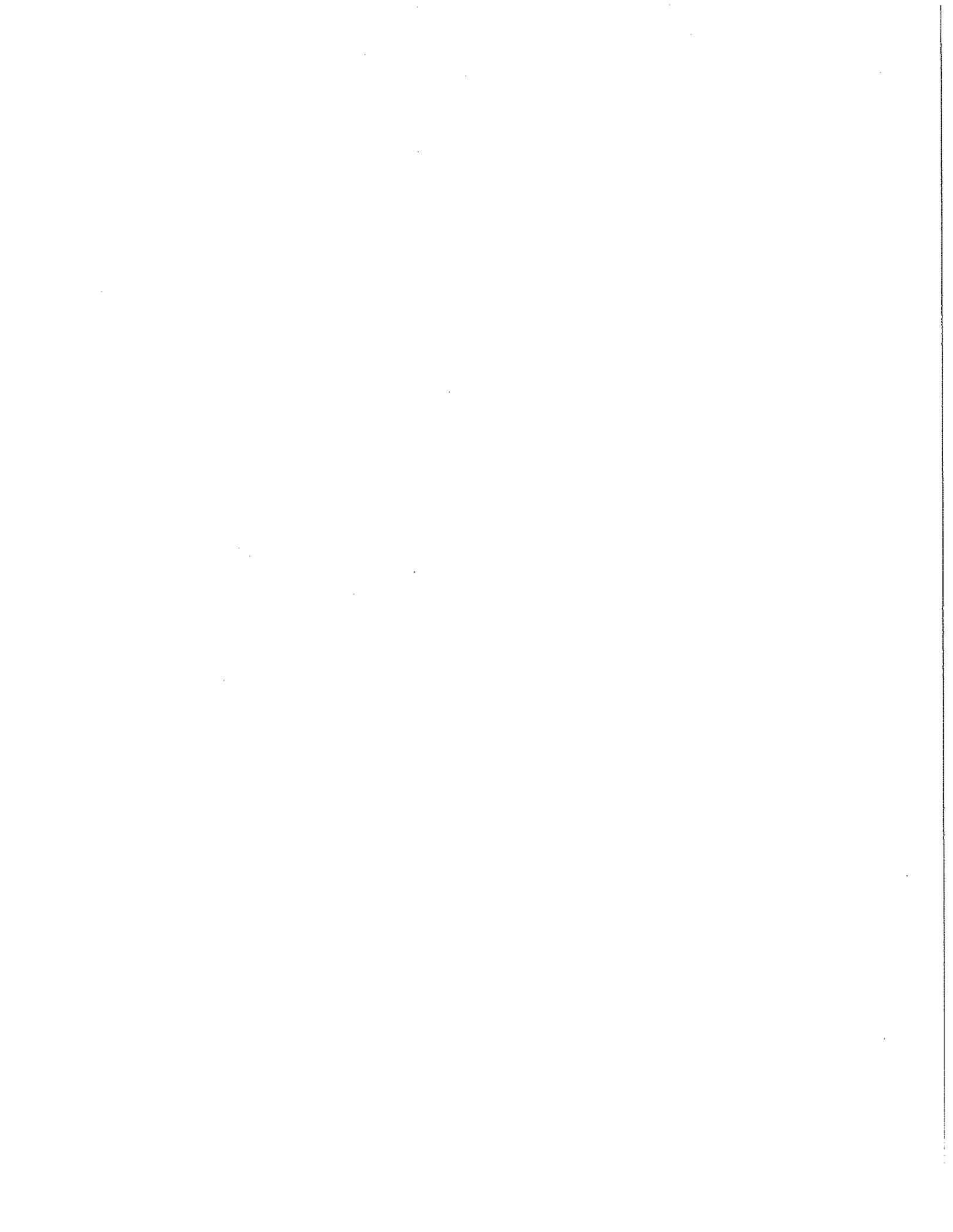
**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 3; Regional Water Quality Control Bd., Region 5 (Redding); Department of Toxic Substances Control; Native American Heritage Commission



**Document Details Report  
State Clearinghouse Data Base**

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*Date Received* 04/27/2007      *Start of Review* 04/27/2007      *End of Review* 06/26/2007



To: Brendan Vieg, City of Chico Planning Department

Re: Comment on the Bidwell Park Master Management Plan and Draft Environmental Impact Report

Diverse soil characteristics in Bidwell Park support a wide range of natural communities. Both the spatial relationships of the soils and their characteristics reflect geologic, geomorphic, climatic, hydrologic, and biologic conditions. Understanding these factors and grouping areas with similar conditions into management units by their soil properties is essential for understanding and managing natural resources, however, these processes are missing from the Bidwell Park Master Management Plan (BPMMP) and Draft EIR (DEIR).

In addition, the spatial soil information included in the BPMMP and DEIR is incomplete – the whole Park is not represented. Unfortunately, the information that *is* included is not applied in any integrated way. Furthermore, referring to the Modesto and Red Bluff Formations as “rock units” and calling the vernal pool complexes on the Red Bluff formation as “Northern Mudflow Vernal Pools” shows a lack of understanding of the physical makeup of the Park. If we are going to manage the Park, we must understand it.

Grouping areas into active flood plains, alluvial fans, alluvial fan terraces and the bedrock foothills consisting of different types of rock would provide context to understanding the resource: where different conditions occur and how they respond to various impacts, uses, and management. These groupings would help planners understand compatibility and suitability issues. For example:

- Very deep soils on the flood plains and alluvial fans are resistant and resilient to high intensity use. Their physical depth, soil textures and fertility allow these soils to maintain these functions even when degraded. They recover quickly when an impact is removed. The deeper soils in the foothills on the Tuscan Formation and on colluvium derived from the Lovejoy Basalt also have this capability, however, the steeper slopes in these areas are susceptible to erosion. (The soil map included in the BPMMP and DEIR doesn't specifically delineate the deeper soils on the Tuscan Formation; fortunately, they are described and associated with their corresponding vegetation to aid in identifying them on the ground.)
- The shallower soils on the Red Bluff Formation terraces and Tuscan Formation foothills, are more limited in their resistance to impact to absorb degradation due to their volume. The “A” horizons (top soil) in these soils are one to two inches thick and when they are removed, soil function for biologic and hydrologic services is greatly impaired. (Would mitigation with several inches of mulch, adding as thick a layer of mulch as the existing natural soil profile, create new, unnatural conditions negatively impacting the existing biological communities?)
- The shallower soils on the Lovejoy formation are generally durable due to the high amount of angular gravel and cobbles.

In my opinion, neither a basic understanding of soils, a very important natural resource, nor the application of available information to existing conditions was conveyed in the BPMMP DEIR. Unless reconsidered, this will lead to poor natural resource management

decisions that will cause continued degradation and undue risk to the Park's existing natural communities.

[http://soildatamart.nrcs.usda.gov/manuscripts/ca612/0/butte\\_ca.pdf](http://soildatamart.nrcs.usda.gov/manuscripts/ca612/0/butte_ca.pdf) is the web address for the Butte Area Soil Survey Manuscript.

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