FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

City of Chico Vegetative Fuels Management Plan

February 2021

SCH Number: 2020090170

City of Chico- Public Works Department, Parks Division
965 Fir St., Chico, CA 95928
Contact: Linda Herman, Park & Natural Resources Manager
530-896-7800

Funded by a CAL FIRE Community Wildfire Protection Grant #5GA18210

Prepared with the Technical Assistance of:

Butte County Resource Conservation District
150 Chuck Yeager Way, Ste. A, Oroville, CA 95965
Contact: Wolfy Rougle 530-693-3173

CSU, Chico Big Chico Creek Ecological Reserves
25 Main St., Ste 203
Chico, CA 95928-5388

Deer Creek Resources
1100 Fortress St. #2
Chico, CA 96973

Dempsey Vegetation Management

Chico, CA

Butte County Fire Safe Council

TABLE OF CONTENTS

TABLE OF ACRONYMS AND SPECIAL TERMS

ACRONYM	MEANING
AUM	Animal Unit-Month, a stocking metric during grazing activities
BCAQMD	Butte County Air Quality Management District
BCCER	Big Chico Creek Ecological Reserve
BMPs	Best management practices
BPMMP	Bidwell Park Master Management Plan
BPPC	Bidwell Park and Playgrounds Committee
BRCP	Butte Regional Conservation Plan
CAL FIRE	California Department of Forestry and Fire Protection
C.A.R.D.	Chico Area Recreation District
CCG	Comanche Creek Greenway
CDFW	California Department of Fish & Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNPS	California Native Plant Society
CRHR	California Register of Historic Resources
CRPR	California Rare Plant Rank
CSUC	California State University, Chico
CVFPB	Central Valley Flood Protection Board
CVRWQCB	Central Valley Regional Water Quality Control Board
CWA	(United States) Clean Water Act
dbh	Diameter at breast height, a way to measure the thickness of trees.
DEIR	Draft EIR
DPR	(California) department of Pesticide Regulation

DWR	(California) Department of Water Resources, an agency which has the responsibility to maintain floodwater conveyance in several of Chico's channels
EDRR	"Early Detection and Rapid Response," a strategy for engaging people to identify and control invasive weeds. Colloquially, "EDRR weeds" in an area are the ones that people are particularly vigilant about keeping out of their parklands.
EIR	Environmental Impact Report, a type of CEQA document
EPA	(United States) Environmental Protection Agency.
ESA	(United States) Endangered Species Act
FRI	Fire return interval
FRID	Fire return interval departure (a measure of the difference between a place's historical fire return interval and its modern-day fire return interval).
HCP	Habitat Conservation Plan
IS	Initial Study (also known as "the Appendix G checklist," a type of preliminary CEQA document that sorts out insignificant from potentially significant impacts
LCC	Little Chico Creek
LOP	Limited Operating Period (i.e., a seasonal restriction on when work can be done).
MM	Mitigation measure
MND	Mitigated Negative Declaration, a type of CEQA document
NAHC	(California) Native American Heritage Commission
ND	Negative Declaration, a type of CEQA document
NOC	Notice of Completion, a document filed by a public agency that accompanies any other CEQA filing
NOD	Notice of Determination, a document filed by a public agency when it completes the CEQA process
NOE	Notice of Exemption, a document filed by a public agency to show that a project is exempt from further CEQA review
NOP	Notice of Preparation, a document a public agency uses to announce it is preparing an EIR
OHWM	Ordinary High-Water Mark, the level of every stream channel up to which the State of California holds an easement to perform activities found by the Legislature or the People to be in the public interest (e.g., removing obstacles to floodwater conveyance).
OLWM	Ordinary Low Water Mark, the level of every stream channel which forms the upper boundary of the land to which the State of California holds title under the Public Trust Doctrine. While the State holds title to lands below the OLWM, it usually merely holds an easement on lands between the OLWM and OHWM.

QAC	An individual holding a certificate qualifying the individual to apply herbicides but not to supervise others' applications or operate a pest control business
QAL	An individual holding a certificate qualifying the individual to apply herbicides and also to supervise others' applications and operate a pest control business
RDM	Residual Dry Matter, a measure of how much forage remains in a paddock after grazing activities
RPA	Registered Professional Archaeologist
RPF	Registered Professional Forester
RWQCB	Regional Water Quality Control Boards, the group of regional agencies responsible for implementing the Clean Water Act in California. (Chico is in the jurisdiction of the Central Valley RWQCB.)
PEIR	Programmatic EIR
SPR	Standard Project Requirement
TEK	Traditional Ecological Knowledge
TMDL	Total Maximum Daily Load, an allowable level of sedimentation or other pollution
Units	Unless otherwise noted, "units" means the discrete bounded areas in which a type of work is to be done. A project can consist of a single unit or may consist of multiple units. If a project has multiple units, they may be spread out in space or time, and/or they may differ in prescription (such as when a south-facing hillslope is thinned to a different standard than the north-facing slope.)
USACE	U.S. Army Corps of Engineers
USFWS	US Fish & Wildlife Service
VELB	Valley Elderberry Longhorn Beetle, a sensitive endemic species
VFMP	Vegetative Fuels Management Plan
WFU	Wildland Fire Use – a modified suppression tactic in which wildfire is allowed to burn, closely monitored, if it is achieving beneficial effects and does not threaten values at risk.
WUI	Wildland Urban Interface: A transitional zone where human development abuts wildlands or the two are intermixed

1 INTRODUCTION

1.1 PURPOSE OF THE FINAL EIR

City of Chico Public Works, Parks Division (Division or City) proposes to implement the Vegetative Fuels Management Plan ("VFMP," "Program," or "proposed project"). This Program Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] § 21000 *et seq.*) and the amended Guidelines for the Implementation of CEQA (CEQA Guidelines) (14 California Code of Regulations [CCR] § 15000 *et seq.*) and provides an assessment of the potentially significant environmental effects of the proposed VFMP.

The City is the "lead agency" for the VFMP evaluated in this Final Program EIR (PEIR). The decision-making body responsible for the certification of this Final Program EIR as adequate and complete is the Chico City Council. Prior to Council consideration, the Bidwell Park and Playground Commission (BPPC) will consider the Final PEIR and provide recommendations to the Council.

The City has prepared this Final Program EIR to:

- Inform the general public and decision makers about the nature of the VFMP, potentially significant environmental effects, feasible mitigation measures to avoid or mitigate those effects, and reasonable and feasible alternatives to the proposed project;
- Enable the City to consider the environmental consequences of approving the VFMP; and
- Satisfy CEQA requirements.

In accordance with the CEQA Guidelines, after completion of the Draft Program EIR, the City is required to consult with and obtain comments from affected public agencies, and to provide the public with an opportunity to comment on the Draft Program EIR. The City is then required to respond to significant environmental issues raised in the review and consultation process (CEQA Section 15132). During the review and comment process for the VFMP Draft PEIR, no significant new environmental effects were identified, and no significant new information was added to the PEIR.

As described in CEQA and the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects of proposed projects, where feasible. A public agency is obligated to balance the proposed project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. The Program EIR is an informational document that, as required by CEQA, (1) assesses the potentially significant environmental effects of the proposed plan, including cumulative impacts, (2) identifies feasible mitigation measures to avoid or substantially reduce significant impacts, (3) identifies any significant and unavoidable adverse impacts that cannot be mitigated to less than significant levels, and (4) evaluates a range of reasonable alternatives to the proposed project, including the No Project Alternative, that would eliminate or substantially reduce any significant adverse environmental effects of the proposed project.

The CEQA lead agency (in this case, the City) is required to consider the information in the PEIR, along with any other relevant information in the administrative record, in making its decision on a proposed project. Although the PEIR does not determine the ultimate decision that will be made regarding implementation of the proposed project, CEQA requires the City to consider the information

in the PEIR and make findings regarding each significant effect identified in the PEIR, if any, before it can approve the proposed project (i.e., adopt the VFMP). The VFMP PEIR does not identify any significant effects that would remain after mitigation. The City would need to certify this Final Program EIR prior to adopting the VFMP and starting work on any of the key projects identified as part of the VFMP process. The City is required to consider the information in the Program EIR, along with any other relevant information in the administrative record, in making its decision on the VFMP.

1.2 SUMMARY OF THE PROPOSED PROJECT

The purpose of the VFMP is to describe actions that the City will take over many years to minimize fire risk while improving other values relating to vegetation, including ecological health, on the City's 6,400+ acres of parks, greenways, and open space. The VFMP covers all land owned and managed by the City, including parks, greenways, and open spaces (henceforth referred to collectively as "Chico parklands"). It does not address CARD-owned lands or the urban forest (street trees). It identifies high fire hazard areas in greatest need of treatment, describes how fire can best be managed in each of Chico's five main vegetation communities, and develops policies and actions focused on reducing the harmful impacts of wildfire in the community, while protecting and in some cases enhancing Chico's natural resources, including by redressing the effects of long-term unnatural fire suppression.

ENVIRONMENTAL REVIEW PROCESS

The Draft Program EIR was prepared to analyze the environmental impacts of the proposed project. The Draft Program EIR considered the proposed project and alternatives that might reduce or avoid significant environmental impacts. The Draft Program EIR was circulated to affected public agencies and interested parties for a 45-day review period from Dec 18, 2020 to Feb 2, 2021. (The formal comment period began on Dec. 18th because that is when the Office of Planning and Research ("State CEQA Clearinghouse") acknowledged receipt of the Notice of Availability and draft PEIR. However, in practice, interested Chico residents could and did comment earlier because the draft PEIR was available for public review through the BPPC web page starting Dec. 10, 2020.) Comments on the Draft Program EIR were to be submitted in writing by no later than 5:00 pm on Feb 2, 2021.

In conformance with CEQA Guidelines Section 15151, EIRs should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to decide on the project and considers environmental consequences. The Final Program EIR is required to examine mitigation measures and alternatives to the project intended to reduce or eliminate environmental impacts that would be potentially significant without mitigation.

The Final Program EIR will be available for review in the City Public Works Operations & Maintenance Department, 965 Fir Street, Chico, 530-896-7800, and on the City of Chico website at https://chico.ca.us/post/vegetative-fuels-management-plan.

In accordance with CEQA guidelines, the Final Program EIR was made available to commenting State agencies, which in this case was CAL FIRE, on February 25, 2021.

DOCUMENT ORGANIZATION

This document is organized as follows:

- **Chapter 1: Introduction**. This chapter includes a discussion of the purpose and organization of the Final Program EIR.
- **Chapter 2: Responses to Comments**. This chapter contains copies of comments received during the public review period and responses to those comments. Each comment letter is coded. Each comment is bracketed in the margin of the letter and assigned a secondary, comment-specific number. For example, the first comment in the letter from the California Native Plant Society is A2-1. Each comment letter is followed by a response corresponding to the bracketed comment. Master responses are also provided on topics raised by several commenters.
- **Chapter 3: Revisions to Text of Draft PEIR and VFMP**. This chapter presents corrections or clarifications to the Draft Program EIR based on comments received. The text changes have not resulted in significant new information with respect to the proposed project, including any new potentially significant environmental impacts that cannot be mitigated to less than significant, nor any new mitigation measures. Corrections to the text and tables of the Draft PEIR and VFMP are contained in this chapter. Underlined text represents language that has been added for the Final Program EIR; text with ~~strikethrough~~ represents language that has been deleted in the Final Program EIR.
- **Chapter 4: Mitigation, Monitoring, and Reporting Program.** When approving projects with mitigation measures that if implemented would avoid or lessen otherwise potentially significant impacts, CEQA requires public agencies to adopt monitoring and reporting programs or conditions of project approval to mitigate or avoid the identified potentially significant effects (Public Resources Code Section 21081.6(a)(1)). This chapter lists each mitigation measure that could potentially be used to mitigate otherwise potentially significant impacts from future activities under the PEIR, followed by a tabular summary of monitoring requirements.
- **References** used in responding to comments. This is not a list of all references used in developing the VFMP or the full PEIR.

2 RESPONSES TO COMMENTS

INTRODUCTION

This section contains the comments received during the public review period on the Draft Program EIR prepared for the VFMP and the responses to those comments. Written and verbal comments on the Draft Program EIR were received from the organizations and private individuals identified in Table 2.1-1. Comments were welcomed by written letter to the City Parks Division office, by email to the Natural Resources Manager or to the Butte County Resource Conservation District (BCRCD) project manager, and through a comment form set up on the BCRCD website. Email comments have been treated with the same weight as written (paper) comments. The City did not place, and CEQA itself does not place, any restrictions on who could comment, what type of identifying information a commenter needed to provide, or how many comments an individual could submit. All comments that were received after release of the PEIR were considered to address the adequacy of the PEIR. One comment was received from a State agency (CAL FIRE) during the public review period. No comments were received from regional, or local resource agencies.

During the public review period, a public meeting was held on January 20, 2021, to receive verbal comments. The public meeting was conducted virtually, using WebEx, due to the ongoing COVID-19 crisis, and was held as a part of a regularly scheduled BPPC Natural Resources Committee meeting. Four members of the public asked questions or made statements during the public meeting. Their comments are transcribed in Category C and responses are provided.

The comments are organized into three categories: Category A (written comments from organizations, including State agencies); Category B (written comments from individuals); Category C (oral comments at a public meeting). Comments are listed below with the name of the commenter and the date their letter was received or verbal comment taken in Table 2.1-1. Each comment letter has been assigned a code as shown in the table. Each specific comment within a particular letter has been bracketed and assigned a number. For example, the third comment in letter "A3" is identified as "Comment A3-3." The corresponding response uses the same coding system, so the reader can match each response to the comments to which it refers.

Comments have been pasted into this document as pictures. Comment text has not been altered or edited in any way.

Table 2-1 Commenters on the Draft EIR and Corresponding Comment and Response Numbers

Commenter	Comment Code	Date of Comment
Organizations		
CAL FIRE, Dave Derby, Unit Forester, Butte Unit	A1	1/7/2021
Mt. Lassen chapter of the California Native Plant Society (CNPS), Woody Elliott, Conservation Chair	A2	2/2/2021
Friends of Bidwell Park, Tom Barrett, Board of Directors	A3	2/2/2021
Individuals		
Daniel Machek	B1	12/16/2020
Tarot Channel	B2	12/16/2020
Anonymous 2:31 pm	B3	12/17/2020
Anonymous 3:04 pm	B4	12/17/2020
Justin Lin	B5	12/17/2020
Meleiza Figueroa	B6	12/17/2020
Ali Meders-Knight	B7	12/17/2020
Anonymous 5:12 pm	B8	12/17/2020
Raphael DiGenova	B9	12/17/2020
Anonymous 7:38 am	B10	12/27/2020
Jilackey84	B11	12/28/2020
Eartha Shanti	B12	1/05/2021
Jake Davis	B13	1/13/2021
Anonymous 8:55 pm	B14	1/24/2021
Dr. Sarah M. Pike	B15	1/30/2021
Meleiza Figueroa	B16	1/31/2021
Anonymous 6:17 pm	B17	1/31/2021
Raphael DiGenova	B18	2/02/2021
Public Meeting		
Ali Meders-Knight	C1	1/20/2021
Woody Elliott	C2	1/20/2021
Aaron Haar	C3	1/20/2021
Lise Smith-Peters	C4	1/20/2021

MASTER RESPONSES

Overview:
This section contains master responses to address comments on topics that were raised multiple times. Master responses provide information in a comprehensive discussion that clarifies and elaborates upon, as necessary, the analysis in the Draft Program EIR. As appropriate, the responses to individual comments refer back to master responses.

MASTER RESPONSE 1: MECHOOPDA-LED LAND MANAGEMENT AND INCORPORATION OF T.E.K. INTO VEGETATION MANAGEMENT

Comments:
Fifteen comments advocated for Mechoopda-led land management, and eight specifically requested the City incorporate, or base vegetation management on, the Traditional Ecological Knowledge (T.E.K.) of the Mechoopda people.

Definitions
The Mechoopda Tribe of Chico Rancheria are recognized by the United States government and local custom as the original inhabitants of the lands now known as Chico, CA and its environs. T.E.K. is a term describing the traditional ecosystem management techniques utilized by indigenous peoples, usually over hundreds or thousands of years. T.E.K. differs from university-based or agency-based ecological knowledge in that T.E.K. tends to be orally transmitted and usually more highly site-specific. However, the two bodies of ecological knowledge also share similarities in that both are based on repeated observation over time and both have usually been elaborated in response to perceived societal needs, such as the continued availability of certain resources, the need for public safety from natural threats, or the political, aesthetic, or spiritual importance attributed to keeping a given natural site within a given range of ecological conditions.

Responses:

Mechoopda-led land management
The comments are noted. Not all commenters specified what type of leadership they sought. Mechoopda-led land management could mean an individual Mechoopda person coordinating teams of volunteers to care for plants in Chico parks under a volunteer agreement. It could mean conducting formal City-Tribal consultation on future vegetation management projects (as is required for all projects that are within the scope of the PEIR (see section 4.18.2), pursuant to CEQA §§ 21074 and 21080 as amended by AB 52). Two commenters requested the City preferentially hire Mechoopda work crews for implementation projects. Mechoopda work crews have not been available for vegetation management projects until recently, but the City welcomes proposals or bids from the Mechoopda-led crew (which currently contract under the umbrella of CHIpS, Calaveras Healthy Impacts Solutions) or any crew under the City's purchasing procedures. Development of a sole-source contract with the Mechoopda land management crew, as suggested by one commenter, should be discussed based on tribal consultation.

Integration of T.E.K. into City Land Management
The comments are noted. The City has sought and will continue to seek to incorporate T.E.K. into land management projects going forward. A discussion of these efforts follows.

In California, many T.E.K. techniques – primarily, but not exclusively, including the deliberate initiation of fire -- were applied by Native people to the land base for so long and so consistently that

they constituted an evolutionary pressure shaping the composition and structure of the vegetation communities. In other words, many Californian plants and floristic communities cannot reproduce or remain healthy without regular fire, in many cases relying on humans to introduce fire more frequently than it would naturally occur.

When Europeans and Euro-American immigrants first settled what is now California, starting in 1769, they described the structure and function of these vegetation communities with approval in their journal entries and survey reports. However, after settlement, the replacement of T.E.K.-based land management with Euro-American land management techniques led to changes in vegetation community composition and structure. While these changes are different in different locations, one overarching theme is the increased density of woody vegetation. Historical reports from around the time of settlement describe a much more open, less dense forest than is seen today. Uncharacteristically dense woodlands are recognized as a major cause of the uncharacteristically intense wildfires that have become frequent in the last twenty to thirty years. Most biologists agree that if Californian forests and woodlands could be returned to pre-settlement densities, wildfires would be less severe, even with climate change.

To summarize, native T.E.K.-based land management, which included the frequent deliberate application of fire to achieve a number of objectives, resulted in the landscape seen by John and Annie Bidwell when they first arrived in California, a landscape now regarded as relatively healthy and desirable. The land management techniques applied by Californians over the 20th century, which included extensive long-term fire suppression, resulted in a landscape that looks very different than what John and Annie Bidwell would have seen, and is now regarded as relatively unhealthy and undesirable. Fire ecologists describe the condition of fire-suppressed communities as "departed" from their natural state. The departed condition of much of Bidwell Park reduces the City's ability to meet its management objectives as listed in the Bidwell Park Master Management Plan, including O. Upper-1. "Manage Upper Park as open space set aside to remain in its natural state." The City generally interprets "natural state" to mean a state similar to or as consistent as practical with the state Annie Bidwell would have known and appreciated in the Park.

To that end, a stated objective of the VFMP is to reduce or counteract the adverse impacts of long-term fire suppression by reintroducing prescribed fire as well as fire surrogates (e.g., cutting, chipping, and grazing) and to restore a less dense woodland structure that is also less dominated by invasive fuels. Implementation of the VFMP is expected to result in a woodland structure that is more open, more native-plant-dominated, and more similar to pre-settlement conditions. The City agrees that incorporation of T.E.K. into management plans is an excellent way to achieve these outcomes.

It may not be possible or desirable to incorporate T.E.K. into every vegetation management project the City does, and T.E.K. actions on City lands still need to be consistent with CEQA and the PEIR. To invite more T.E.K. incorporation into City management actions, a framework is built into the VFMP and its PEIR in several ways. First, a rough draft of the VFMP was drafted by natural resource specialists who are relatively familiar with Native land management concepts and have previously worked on projects that sought to incorporate at least some aspects of T.E.K. (e.g., cultural fire). Second, that rough draft VFMP was submitted to an environmental scientist in the Mechoopda Tribal Office of Environmental Planning and Protection and the scientist's comments were incorporated into the second draft of the VFMP. Third, as the PEIR was being developed, tribal consultation was established with the Mechoopda Tribal Historic Preservation Office (THPO) and THPO requests were incorporated into the PEIR. These include the Tribe's right to monitor any project (at Tribal expense), to designate sites of cultural importance that might be closed to the public or Parks workers during cultural events, and to receive and use plant material that is removed during VFMP activities. Fourth,

Tribal members have been able to submit comments on the VFMP and PEIR during comment periods. Fifth, because each future project will be unique and will benefit from T.E.K. integration in a unique way, the PEIR and its Project Consistency Checklist were written in such a way as to provide tribal consultation for every future project under the scope of the PEIR. The City feels that a direct government-to-government consultation process with the Mechoopda Tribe is the best way to determine when and how to integrate T.E.K. into projects.

In conclusion, the PEIR is designed to allow both parties to continually address and improve the relationship between City land management, CEQA, and T.E.K. through the existing tribal cultural resources consultation and monitoring framework already required by AB 52. To ensure timely work, the PEIR stipulates that no project may be held up by cultural monitor scheduling unless the resources involved are deemed exceptionally significant pursuant to 36 CFR 60.4.

MASTER RESPONSE 2: PRESCRIBED BURNING IN THE PARKS

Comments

Nine commenters supported increased prescribed burning in City-owned parks, citing reduced fuels, improved public safety, and increased property values.

Response:

The comments are noted. The VFMP PEIR provides for safely and substantially increasing the amount of prescribed burning that is conducted within City limits. All burns will be conducted in compliance with BCAQMD and relevant fire department regulations and will be subject to an extensive list of standard project requirements (SPRs) that are designed to protect hydrological, historical, tribal cultural, biological and other resources. Most commenters who supported burning also specifically referenced Mechoopda land management, so it is relevant to observe that all future burn projects should incorporate tribal consultation to improve opportunities for knowledge-sharing and participation by Tribal people.

By the end of February 2021, the City will produce a full area burn plan showing priorities for prescribed burning units, future opportunities for good fire that can be developed, and some suggested administrative, human resources, or educational approaches (i.e., actions not subject to CEQA) the City and partners could use in the future to increase the use of good fire as a restorative influence in Chico parklands. The full area burn plan is separate from the VFMP. All future burns would still be subject to CEQA and would be analyzed on a burn-by-burn basis to determine if they are within the scope of the VFMP PEIR or not.

MASTER RESPONSE 3: THE "KEY" (FORMERLY "SHOVEL-READY") PROJECTS.

Comments

Two comments asked for more detail about why the seven key projects (formerly alluded to as the "five shovel ready projects") are not ready for implementation and what studies need to be done to make them ready for implementation.

Response:

A deliverable of the VFMP grant was to "result in at least five high-priority shovel-ready projects on which CEQA will already be complete." Due to COVID-related delays, as well as CAL FIRE shortening the grant term by one year at time of award, it became clear by late 2020 that none of these projects would be "shovel-ready" by the grant deadline of March 15, 2021 because all were missing at least one survey or a detailed work plan. CAL FIRE was notified of this in grant progress reports. CAL FIRE continued to approve of work progress. The projects are now called the "key" projects. Once the PEIR is certified, detailed project-specific environmental review can proceed on each of the key projects (see Master Response 4), although it will not be funded with grant monies after the conclusion of the grant term. Since the grant term was not able to be extended, the City is adapting by spending the funds "saved" on surveys by developing a maintenance agreement with CDFW for work in streamside areas, a long programmatic permitting need for the City. While not originally a grant deliverable, this work serves the grant purpose to develop a programmatic basis for streamlining and accelerating fuels work. Moreover, it is expected to save the City tens of thousands of dollars in CDFW LSAA fees over the next half-decade, compared to the cost of developing CDFW agreements project-by-project. Again, CAL FIRE was notified of this in grant progress reports. CAL FIRE has continued to approve of work progress.

The following key project surveys have already been done: Late-spring botanical surveys have been completed for Key Projects 1 and 2 (to supplement these, RCD anticipates completing a quick round of early-spring surveys in March 2021). Archaeological surveys are also complete for Key Projects 1 and 2. A site-specific burn plan is being developed for project 5.3 (Middle and Upper Park star thistle burns).

MASTER RESPONSE 4: FUTURE ACTIVITY WORKFLOW.

Comments:
Three commenters asked how the key projects as well as other future activities under the VFMP would be developed and reviewed. How would these projects' detailed work plans be developed and subjected to environmental review, who would be responsible for it, and how would the public/BPPC be notified? Furthermore, how would monitoring, if appropriate, be conducted?

Response:
CEQA allows lead agencies considerable flexibility in how they review future activities once a PEIR is completed. To meet its obligations under CEQA, the Public Works Department (Parks Division) would need to complete the following steps for each future activity under the PEIR:

1.) Complete the Project Consistency Checklist to determine whether the activity's description, geographic location, and potential impacts are entirely within the scope of the PEIR or not.

2a.) If the activity is within the scope of the PEIR, then no additional environmental document is needed (CEQA Guidelines §15168(c)(1) and (2)). The Director or designee would sign the Determination in the Project Consistency Checklist and file a Notice of Determination (NOD) with the County Clerk. Work could then begin immediately as soon as that NOD is posted.

OR

2b.) If the activity is not entirely within the scope of the PEIR, the City would need to prepare a new environmental document (an NOE, ND, MND, or EIR) analyzing the activity as a new project. However, this analysis would only need to address the aspects or resource topics of the project that were outside the scope of the PEIR.

Those are the only steps to future activity approval that are required by CEQA. However, in practice, in order to complete step (1) the Parks Division will need to:

(1) Develop a detailed, readable work plan for the activity that incorporates all relevant SPRs and can easily be used to instruct crews;
(2) Conduct at least some surveys or reviews of the activity area, as specified by the PEIR; and
(3) Develop a customized Mitigation, Monitoring and Reporting Plan (MMRP) for the site-specific activity. This MMRP would list all relevant SPRs as well as their timing and who is responsible for them. (If applicable, it would also list any mitigation measures from the PEIR.)

CEQA does not specify how or whether the City must make these internal documents available for review, or which individuals or bodies must review which documents. Those are administrative decisions for the City to make, and, if it chooses, revise from time to time. A procedure for the review of internal VFMP-related documents will be developed and presented to the Bidwell Park and Playgrounds Commission for consideration following the final adoption of the VFMP.

MASTER RESPONSE 5: IS THE VFMP FINISHED OR A "DRAFT"?

Comments:
Two commenters asked how the PEIR can be circulated when the VFMP is still marked "draft".

Response:
The VFMP is considered complete and is not expected to undergo significant changes before adoption by the Bidwell Park and Playground Commission. However, adoption of the VFMP is a project under CEQA. A project under CEQA cannot be approved by a public body until environmental review has been completed on it. Therefore, the VFMP cannot be approved until its PEIR is certified (CEQA Guidelines §15090; Chico Code of Ordinances 1.40.590). Until a plan is formally approved and adopted by a public body, it is still a "draft".

Just as any other project (e.g. a housing development) might have plans that are complete, but not approved, until its PEIR is certified, so too the VFMP is complete, but not approved, until its PEIR is certified and the BPPC adopts the VFMP. Although the VFMP is not a general or specific plan, this is also similar to the way in which a draft General Plan remains a "draft" until its accompanying PEIR is certified.

SPECIFIC RESPONSES TO INDIVIDUAL, ORGANIZATION, & AGENCY COMMENTS

This section presents all comments received on the Draft PEIR, including comments received during the public hearing on January 20, 2021, and responses to all comments received. Where a comment is addressed in a Master Response, that Master Response number is indicated.

LETTER A1: CALFIRE; DAVE DERBY, UNIT FORESTER, BUTTE UNIT

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY Gavin Newsom, Governor

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
Butte Unit
176 Nelson Ave
Oroville, CA, 95965
(530) 538-7111
Website: www.fire.ca.gov

January 7, 2021

Linda Herman, P&NRM
City of Chico Park Division
P. O. Box 3420
Chico, CA 95927

Re: City of Chico Vegetative Management Plan, SCH# 2020090170

Ms. Herman,

Thank you for the opportunity to review and comment on the draft programmatic environmental impact report of the City of Chico Vegetative Management plan. The plan seems comprehensive and well written. My only comment is that no CAL FIRE LE-5 permit will be needed for the Middle- and Upper-Star Thistle Burns (page 65). The reason is that the work will being performed within the city limits of the City of Chico and the California Department of Forestry and Fire Protection (CAL FIRE) does not have jurisdiction in this area.

Respectfully,

Dave Derby

David Derby
Butte Unit Forester and Environmental Coordinator

"The Department of Forestry and Fire Protection serves and safeguards the people and protects the property and resources of California."

Response to Comment A1:

The comment is noted and the reference to CALFIRE permits has been removed. The City thanks Mr. Derby for his comments.

LETTER A2: CALIFORNIA NATIVE PLANT SOCIETY, MT. LASSEN CHAPTER; WOODY ELLIOTT, CONSERVATION CHAIR

To: Linda Herman, P&NRM
City of Chico Park Division
P.O. Box 3420
Chico, CA 95927

From: Woody Elliott, Conservation Chair
Mount Lassen Chapter – CNPS
PO Box 4067
Chico, CA 95927-4067 February 2, 2021

Re: DRAFT Programmatic Environmental Impact Report and DRAFT Vegetation Fuels Management Plan for the **City of Chico Vegetative Fuels Management Plan – December 2020 SCH Number: 2020090170**

Note: Questions and comments follow referenced "quote" from page number (Pg. #) of respective documents.

DRAFT Programmatic Environmental Impact Report (DPEIR):

Pg. 4: "The Plan approval is the first is (sic) a sequence of contemplated actions, followed by subsequent approvals to implement the proposed Projects and other future activities consistent with the VFMP."

What are the subsequent approvals necessary to implement the proposed Projects and when and how will they be available for review by the Bidwell Park and Playground Commission (BPPC) and the public?

Comment A2-1

Pg. 4: "To determine whether a future activity/project is entirely or partially within the scope of this PEIR or not, the City will use the Project Consistency Checklist attached in Appendix A."

How will the BPPC and the public be able to review the Project Consistency Checklist prior to implementation of the activity/project in time to review and potentially object to its findings to the BPPC and/or the court?

Comment A2-2

Pg. 5. "As a deliverable of the CAL FIRE grant, the Plan also contains seven key Projects which are high priorities for the City and stakeholders. Making these projects "shovel-ready" (i.e., fully reviewed and permitted) was one of the goals of the grant."

Why are these key Projects not "shovel-ready" with field surveys done, SPRs (Standard Project Requirements) and mitigation measures assigned with documentation for each project usefully in a draft Project Consistency Checklist?

Comment A2-3

Pg. 5: "the Project Consistency Checklist would then serve as an Initial Study to determine the appropriate environmental documentation the City would need to prepare."

When would this Project Consistency Checklist / Initial Study be available for review by the BPPC and the public in time to review and potentially object to its findings to the BPPC and/or the court?

Comment A2-4

Pg. 6. "1.3 ENVIRONMENTAL IMPACTS AND MITIGATIONS

1.3.1 Less than significant impacts "Air quality – emission related impacts associated with vegetation management (e.g., chain saws, chippers, smoke) would be minor, temporary, and less than significant."

Would smoke emissions from prescribed burns be made less than significant by conforming to project specific permit requirements from the Butte County Air Quality Management District or is the statement merely an assumption based on what?

Comment A2-5

Pg. 7: "a framework for compensatory mitigation has been developed (MM-BIO-1) that would (with CDFW and/or USFWS concurrence) reduce these impacts to below a level of significance."

When would such concurrences with CDFW and / or USFWS be available for review and comment by the BPPC and the public?

Comment A2-6

Pg. 8: "Because streamside work needs to be carried out under the terms of a 1600 permit from CDFW (SPR BIO-10) as well as potentially an encroachment permit from CVFPB, this mitigation measure would still need to be reviewed by CDFW and potentially CVFPB."

When will this review occur and be available for review by BPPC and the public?

Comment A2-7

Pg. 26 "If the City determines the future activity is entirely within the scope of this PEIR, no new environmental document is needed (CEQA Guidelines §15168(c)(1) and (2))."

Documentation of no potential adverse environmental effects per Project Consistency Checklist / initial study checklist must be done and filed for public review upon request or furnished to BPPC in a staff report. A Notice of Determination for such future activity / project needs to be filed with the Butte County Clerk and immediately announced to the BPPC and public who have requested notification of all projects by the City of Chico's Park Division. Will these transparent notifications be done by the City of Chico?

Comment A2-8

Pg. 26 "To determine whether a future activity is entirely or partially within the scope of this PEIR or not, the City will use the project consistency checklist attached in Appendix A."

How and when will a project's completed "project consistency checklist" be made available to BPPC and public review and comment?

See response to Comment A2-4.

Pg. 26 "CAL FIRE or the Wildlife Conservation Board might fund a future vegetation management program in Chico parklands; both these State agencies may serve as lead agency on the projects they fund, so they could utilize the Project Consistency Checklist to finalize review for these projects (with City assistance)."

Why would the City of Chico relinquish its role as lead agency that oversees the adequacy of the analysis of a project's environmental effects and resulting Environmental Determination? Other agencies as lead agency may not be as sensitive to input from local citizens or protective of the City's natural and cultural resources.

Pg. 28: "As noted above, it is not possible to fully evaluate certain impacts today because the nature and extent of the proposed vegetation management actions at a specific work site are not sufficiently defined, and/or information about site-specific resources is lacking. For these situations, the EIR identifies the appropriate subsequent environmental analysis and/or documentation that may be required to ensure consistency with the EIR findings. (See Project Consistency Checklist, Appendix A.)"

Why have the proposed vegetation management actions for key projects not been sufficiently defined and information about site-specific resources not been gathered from previous or up-to-date field surveys? How and when will the BPPC and the public be able to review a subsequent environmental analysis / consistency finding of a proposed vegetative management action for its adequacy of relevant and topical information, e.g. field and literature surveys?

Pg. 29: "The VFMP contains seven "Key Projects," sometimes called "the shovel-ready projects," which have received and/or will receive an elevated level of environmental review using the CAL FIRE grant funding."

What projects have yet to receive an elevated level of environmental review using the CAL FIRE grant funding and when will this occur?

Pg. 29: "All have project boundaries and descriptions; in some cases, botanical and cultural resource surveys have been completed."

What Key Projects have had botanical and cultural resource surveys completed and where are they available for public review?

Pg. 54, 55: "SPR BIO-2: Biological Surveyor Qualifications.

All field survey professionals/biological technicians conducting surveys under SPR BIO-1 and SPR BIO-4 should demonstrate regionally appropriate knowledge of species and protocols. Statewide or national certifications or degrees are not a substitute for Butte County-specific biological expertise."

How will surveyors demonstrate to the City of Chico regionally appropriate knowledge of species and (survey) protocols? Will a list of qualified field survey professionals/biological technicians conducting surveys be maintained by the City? Is a State of California Registered Professional Forester (RPF) automatically considered qualified?

Email from David Magney, Jan 21, 2021, 2:04 PM

Woody,

Comment A2-9

See responses to Comments A2-3 and -4.

Comment A2-10

Comment A2-11 (continues for next 1.5 pages)

Thanks for bringing this to my attention. It is quite disappointing that the City of Chico is taking this position. While I agree that requiring ONLY Certified Botanists work on City impact assessments because the California Certified Botanist program is still young, the objections made for requiring a California Certified Botanist simply because they are required to know the entire California flora and not required to know the Butte County flora is absurd. Every Certified Botanist has the expertise and experience to be able to survey for any plant in Butte County and conduct a high quality assessment. The Board of Certification stands behind every botanist certified since they have demonstrated their knowledge through rigorous examination, something that I am certain the City of Chico nor the County of Butte has done.

My years of experience reviewing the work of "Qualified Biologists" as determined by city and county planning departments have found many to be sorely lacking in their abilities, based on their written reports and assessments. IF the city or county actually determined the botanists' qualifications through examination, then I might agree.

In discussions with several planning agency staff/managers, they have been quite frustrated with the poor quality of work from the consultants' work they have received.

Let me know if I can be of further assistance with this issue.

Cheers,

David L. Magney, CCB-0001
Rare Plant Program Manager
Chair, Board of Certification
California Native Plant Society
2707 K Street, Suite 1
Sacramento, CA 95816
916/447-CNPS ext. 205
530/273-1799 (home office during pandemic)
www.cnps.org
dmagney@cnps.org

Email from Kelly Holland, Thu, Jan 21, 2021

Good morning, Woody,

Thank you for the opportunity to provide our comment and perspective on the concern you raised.

TWS' certifications include Certified Wildlife Biologist (CWB) and Associate Wildlife Biologist (AWB). "The Wildlife Society supports the development and advancement of wildlife professionals throughout their careers. Certification constitutes recognition by TWS that, to its best knowledge, a member meets the minimum educational, experience, and ethical standards adopted by the Society for professional wildlife

Comment A2-11, continued

biologists." A CWB is an "individual with the educational background and demonstrated expertise in the art and science of applying the principles of ecology to the conservation and management of wildlife and its habitats, and is judged able to represent the profession as an ethical practitioner, will be designated as a Certified Wildlife Biologist®."

Our position is that being a CWB/AWB should not be a sole qualification, but it should be recognized or considered. This can be a rather difficult certification to obtain, and all CWBs are vetted by TWS. We believe a CWB/AWB would be well qualified to do the work, and we appreciate that established area experts and student experts provide a critical skill set to completing survey work. We believe that it would be beneficial to have a CWB/AWB partner with and/or supervisor student-based teams of surveyors.

In conclusion, while the Western Section supports and encourages certification within the profession, it has not taken the position that a person who is not certified is unqualified to serve as a biologist.

Kelly Holland, CWB
President, Western Section of The Wildlife Society

Comment A2-11, continued

Pg. 59 "No native tree shall be removed (a "tree" is defined for the purposes of this section as larger than 8" DBH) unless marked beforehand by a qualified arborist, botanist, Registered Professional Forester, or City staff member with adequate training."

This stipulation implies that trees smaller than 8" DBH can be removed by persons without adequate training. This section needs to be reworded to insure that adequately trained individuals do such work.

Pg. 60 "SPR BIO-15: Grazing Plans. A grazing plan shall be prepared for each grazing activity."

These Grazing Plans need to apply to all livestock in addition to cattle that have or could be used to implement projects of the VFMP's PEIR or under its scope, e.g. goats, sheep.

Comment A2-12

Comment A2-13

DRAFT Vegetation Fuels Management Plan (DVFMP)

Pg. 6 "1.2 Scope After plan is complete, City will complete an EIR on the Plan"

Why was the DPEIR prepared for a Draft VFMP prior to its approval by the BPPC?
The Draft VFMP states on page 6: "After this Plan is complete, the City will complete an Environmental Impact Report, or EIR, on the Plan."
If the DRAFT VFMP is significantly changed and approved by the BPPC, then does the DRAFT PEIR need to be amended to consider the approved version and recirculated for agency and public review then BPPC approval?

Comment A2-14

Pg. 62 "The project will thin from below to create open understory conditions under mature black oak trees, remove decadent understory vegetation in the margins of the black oak stands, and create conditions which may allow future understory burns to be used to maintain open conditions in the black oaks"

How will other over-story species in the area of **5.1 "Ten Mile House" Oak Restoration and Wildfire Resilience Project** be managed, e.g. interior live oak, canyon oak, gray pine?

Comment A2-15

Pg. 71 "7. If needed to maintain the health of the willows/native plantings, follow up with suitable maintenance techniques like goat grazing, cultural fire, or hand work."

Will the techniques for application of "cultural fires" be incorporated into prescriptive burn plans required for review of an activity or project's environmental effects in a Consistency Checklist and agency permits e.g. Butte County Air Quality Management District?

Comment A2-16

Pg. 72. "-Reduce ladder fuels, especially invasive plum, blackberry, and walnut, using ecologically trained hand crews (e.g., BCCER or Mechoopda crews)."

Does reducing ladder fuels mean the preferred wholesale removal of these naturalized species or solely removing their branches beneath their taller canopy?

What training constituents ecologically trained hand crews, e.g. knowledge of native vs invasive species, proper pruning techniques?

Is a manual available or to be developed for reference to prescribed field management techniques by ecologically trained hand crews?

Comment A2-17

Pg. 72 "-Target invasives first for removal, removing native plants as a last resort."

In what cases would native plants need to be targeted for removal as any resort?

Comment A2-18

Pg. 72 "-As invasives recede, cultivate a healthy valley oak understory by establishing and maintaining an optimum balance of grasses, wildflowers, and coarse woody debris This understory provides rich forage for pollinators, supports a health soil ecosystem, and contributes to Valley oak health by allowing natural processes to keep acorn pathogens in check. This restoration goal may best be accomplished by creating areas for Mechoopda-led cultivation of plants of cultural significance, such as native geophytes and graminoids."

What techniques and practices are to be used for Mechoopda-led cultivation of plants?

Pg. 72 "-Utilize Mechoopda-led cultural fire to maintain and nourish "orchard oaks".

Comment A2-19

This statement implies that the practice of "Mechoopda-led cultural fire" is without adverse environmental consequences. Prescriptions for use of fire need to be explicit to understand and evaluate the extent of their potential adverse environmental effects.

Comment A2-20

Why are the prescribed fire standards for burning YST patches in Middle and Upper Park not expressed here? A prescribe fire burn plan needs to be developed for approval by regulatory agencies (e.g. Butte County Air Quality Management District) and application in the field.

Comment A2-21

Pg. 75 "LEGEND FOR WORK UNITS IN LOWER PARK THINNING PROJECT

1. Understory Thin."

What are the prescriptions (Best Management Practices) for "Understory Thin"

Pg. 75. "2. Orchard Oak Restoration."

What are the techniques (Best Management Practices) of orchard oak restoration involving the referenced use of fire?

Pg. 75 "8. Cultural fire, demonstration area."

What are the techniques (Best Management Practices / Burn Plan) to be used in the cultural fire demonstration area?

Pg. 75 " 11. Potential grassland restoration and management projects."

What are the techniques (Best Management Practices) to be use in grassland restoration and management projects?

Pg. 75 "13. Oak underburning demonstration site"

What are the techniques (Best Management Practices) to be use on the underburning demonstration site?

Comment A2-22

Pg. 80 "**6.4 Miscellaneous Parcels Survey**

A Spring 2020 survey of all miscellaneous City-owned parcels generated a database of fuels management issues."

Where is this database of fuels management issues available for use in planning future activities and projects under the scope of this VFMP's PEIR and for public review and general reference?

Comment A2-23

Pg. 81 "A programmatic EIR allows managers to "front-load" CEQA analysis in advance. For example, it may include resource inventories of certain areas, so crews do not have to conduct them later."

What resource inventories for certain areas have been done and where are they available for public review and general reference?

Comment A2-24

General Comments:

A. In Cal Fire's California Climate Investments Fire Prevention Grants Program that funded the VFMP and PEIR, its Project Scope of Work on Pg. 10 states:

The ability for public review is a basic tenant of CEQA per CEQA Guidelines 15002.
GENERAL CONCEPTS
(a) Basic Purposes of CEQA. The basic purposes of CEQA are to:
(1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.

Response to Comment A2-1

"What are the subsequent approvals necessary to implement the proposed Projects and when and how will they be available for review by the Bidwell Park and Playground Commission (BPPC) and the public?"

The list of subsequent approvals needed to implement the proposed Projects and other activities are listed on page 28 of the PEIR. For more on how subsequent projects or activities would be approved and/or reviewed, see **Master Response 4: Future activity workflow.**

Response to Comment A2-2

"How will the BPPC and the public be able to review the Project Consistency Checklist prior to implementation of the activity/project in time to review and potentially object to its findings to the BPPC and/or the court?"

For how subsequent projects or activities would be approved and/or reviewed, see **Master Response 4: Future activity workflow.**

Response to Comment A2-3

"Why are these key Projects not "shovel-ready" with field surveys done, SPRs (Standard Project Requirements) and mitigation measures assigned with documentation for each project usefully in a draft Project Consistency Checklist?"
Also: *Why have the proposed vegetation management actions for key projects not been sufficiently defined and information about site-specific resources not been gathered from previous or up-to-date field surveys?*

See **Master Response 3**: **The key projects.**

Response to Comment A2-4

"When would this Project Consistency Checklist / Initial Study be available for review by the BPPC and the public in time to review and potentially object to its findings to the BPPC and/or the court?"

ALSO: *How and when will the BPPC and the public be able to review a subsequent environmental analysis / consistency finding of a proposed vegetative management action for its adequacy of relevant and topical information, e.g. field and literature surveys?*

For how subsequent projects or activities would be approved and/or reviewed, see **Master response 4: Future activity workflow.**

Response to Comment A2-5

"Would smoke emissions from prescribed burns be made less than significant by conforming to project specific permit requirements from the Butte County Air Quality Management District or is the statement merely an assumption based on what?"

Yes, as described in checklist item **AIR-a**, smoke emissions from the City's prescribed burns, as from all legally conducted prescribed burns in Butte County, would be made less than significant by conforming to project-specific permit requirements approved by the Butte County Air Quality Management District (BCAQMD). In practice, this means developing a smoke management plan for each burn, unless (for very small burns) an exemption to an SMP is granted at BCAQMD's sole discretion. Like all burners in Butte County, the City would also need to burn on a permissive burn day (or otherwise receive explicit permission from BCAQMD to burn on a given day).

The City's understanding of this topic derives from explanations by BCAQMD air pollution control officers Jason Mandly and Ursula Parker during PEIR scoping and document development.

Response to Comment A2-6

"When would such concurrences with CDFW and / or USFWS [regarding the sufficiency of compensatory mitigation with regard to threatened or endangered species] *be available for review and comment by the BPPC and the public?"*

As the trustee agencies charged with protecting all special-status and other wildlife and plants in California and the United States, respectively, CDFW and USFWS have the final word on the sufficiency of compensatory mitigation. The informal or formal consultation process, resulting in concurrences or biological opinions, is not itself subject to public review or comment. However, the end result (the detailed activity-specific work plan and Mitigation, Monitoring and Reporting Plan that would be generated before work could begin) would be available for public review.

Response to Comment A2-7

"When will [CDFW's review of the City's streamside work plans, resulting in a 1600/LSAA permit, and CVFPB's review of the City's streamside work plans, resulting in a Flood Board permit] *occur and be available for review by BPPC and the public?"*

LSAs can be developed activity-by-activity or as "an Agreement for Routine Maintenance" covering a period of five or more years. The former type of agreement, which can take one to three months to develop, or more, depending on the activity and other factors, costs between $600 and $3,500 per project. The latter type is more desirable because it can cost $7,500 but be applied to almost unlimited projects. The City tends to need to do many small vegetation management activities covering one or two acres at a time, which is expensive. Therefore, the City would prefer to pursue an agreement for routine maintenance. The City has limited control over how long this would take but would like to develop one over the next one to six months. When issuing an LSA or other Agreement, CDFW as responsible agency generally files a Notice of Determination (NOD). Work can commence as soon as the NOD is issued.

For the CVFPB, an encroachment permit (or the less expensive "maintenance concurrence letter") would be sought for activities occurring within 30 feet of a stream. These permits are typically developed directly between CVFPB and a local maintaining agency (i.e., the City or DWR) after CEQA documents for an activity are complete (CVFPB 2021).

Response to Comment A2-8

"Documentation of no potential adverse environmental effects per Project Consistency Checklist / initial study checklist must be done and filed for public review upon request or furnished to BPPC in a staff report. A Notice of Determination for such future activity / project needs to be filed with the Butte County Clerk and immediately announced to the BPPC and public who have requested notification of all projects by the City of Chico's Park Division. Will these transparent notifications be done by the City of Chico?"

CEQA does not appear to require a lead agency, when approving future activities within the scope of a PEIR, to file a notice of determination with the County Clerk. In practice, most lead agencies do so anyway, and the City expects to file a Notice of Determination for any significant project implemented under the PEIR. For how subsequent projects or activities would be approved and/or reviewed, see **Master response 4: Future activity workflow.**

Response to Comment A2-9

"Why would the City of Chico relinquish its role as lead agency that oversees the adequacy of the analysis of a project's environmental effects and resulting Environmental Determination? Other agencies as lead agency may not be as sensitive to input from local citizens or protective of the City's natural and cultural resources."

The City's capacity to undertake environmental analysis is limited by low staffing levels relative to workload, constraining the amount of work that can be permitted and thus the amount of work that can

be done. For example, development of this VFMP and PEIR would have been impossible without a grant from CALFIRE. Many other land managers are in the same situation.

When help is available from a State agency that can complete or contribute to environmental review, City managers may accept that help if it leads to more work getting done. The City could also decline that help if it had reason to believe the helping agency's environmental review would not be of acceptable quality, or for some other reason. Whatever the lead agency, Chico citizens would still be able to participate in the review process to the same extent they would be able to participate if the City were lead agency. In practice, the City is not very likely to face this choice soon because most state agencies' environmental review capacities are, similar to the City's, very limited.

Response to Comment A2-10

"*What projects have yet to receive an elevated level of environmental review using the CAL FIRE grant funding and when will this occur? What Key Projects have had botanical and cultural resource surveys completed and where are they available for public review?"*

The commenter also asks: ***"C.** Which of the seven (7) Key Projects will require more detailed environmental review once they are more completely defined? Several Key Projects are described in more detail (**5.3 Middle and Upper Park Star Thistle Burns, 5.4 Verbena Fields Stewardship, 5.5 Lindo Channel Vegetation Management, 5.6 Little Chico Creek Arundo Management**, and **5.7 Lower Park Thinning**) than others that are merely scopes of work: (**5.1 "Ten Mile House" Oak Restoration and Wildfire Resilience Project**, and **5.2 "Dozer Lines" Oak Restoration and Wildfire Resilience Project**)."*

See **Master Response 3**: **The key projects.**

Response to Comment A2-11

The commenter asks, "*How will surveyors demonstrate to the City of Chico regionally appropriate knowledge of species and (survey) protocols? Will a list of qualified field survey professionals/biological technicians conducting surveys be maintained by the City? Is a State of California Registered Professional Forester (RPF) automatically considered qualified?"*

No, an RPF is not automatically considered qualified to conduct botanical, wildlife, or cultural resource surveys. Like other professionals, an RPF proposing to conduct those surveys would be judged on his or her references and experience. Because of confusion caused by the use of multiple terms ("biologist," "botanist," "RPF," "qualified staffer", etc.), the section on biological surveyors' qualifications has been revised to emphasize *qualification for the survey that is being done*, not any particular job title.

The City considers surveyors' qualifications based on their resumes and references and on the City's past experiences, if any, with them and/or their employers. The City finds that while a formal certification is usually a sign of a highly qualified specialist, most qualified specialists have no formal certification, only experience and references.

The commenter supplies a response from David Magney, chair of certification for the California Native Plant Society. While part of Mr. Magney's response is a little unclear, he seems to be agreeing with the City that CNPS certification is not required in order to conduct effective and high-quality botanical surveys. However, he also expressed disappointment at the language "Statewide or national certifications or degrees are not a substitute for Butte County-specific biological expertise." This statement was not intended to denigrate the California Certified Botanist program, which is extremely

rigorous. It was intended as a general statement to emphasize the importance of local knowledge, precisely because various certification programs do vary in their applicability to Butte County and are not interchangeable with local experience. Certainly, any CNPS-certified field botanist or consulting botanist would be highly qualified to work on Chico parklands. Because there are so few CNPS-certified botanists in the state (fewer than 30 at the time of this writing in February 2021), the City needs to work with non-certified botanists. The City thanks Mr. Magney for his comments.

The commenter also supplies a response to the PEIR section on surveyor qualifications from Kelly Holland, president of the Western Section of the Wildlife Society. The City agrees with Ms. Holland's remarks that "a CWB/AWB would be well qualified to do the work, and we appreciate that established area experts and student experts provide a critical skill set to completing survey work." The City also agrees that "it would be beneficial to have a CWB/AWB partner with and/or supervisor student-based teams of surveyors," although this is not always possible, and the City believes some local biologists without CWB/AWB certification also make excellent supervisors of students. The City also agrees with Ms. Holland that CWB/AWB certification should not be a prerequisite for being considered a high-quality wildlife biologist, while recognizing the value of the certification and the importance of the work the Wildlife Society does. The City thanks Ms. Holland for her comments.

Response to Comment A2-12

The commenter quotes a section of the PEIR he finds to imply that trees smaller than 8" DBH can be removed by persons without adequate training. The passage has been clarified to read:

> No native tree shall be removed larger than 8" DBH unless marked beforehand by a qualified specialist, arborist, botanist, Registered Professional Forester, or City staff member with adequate training. Native trees smaller than 8 inches DBH may be removed without prior marking, if written into the activity scope and individuals implementing work have been adequately trained.

Young trees tend to grow up in clumps, which would normally be thinned by fire and native ruminants. In the absence of those disturbances, stands can become too dense and the health of all the young trees suffers through overcompetition for sun, nutrients, and water. When and where this occurs, humans can increase a woodland's resilience by thinning trees in some areas. When native trees are very small and dense, it is not efficient to mark all of them for removal in a large-scale project. It is far more efficient to train workers what a canyon live oak looks like (for example) and then show them how to thin the saplings to an appropriate density.

Response to Comment A2-13

The commenter states that grazing plans need to be developed for all types of livestock that could be used to implement projects of the VFMP, not just cattle. The City agrees. BIO-12 (referenced by the commenter) is not intended to apply only to cattle and does not mention cattle or any other particular species of livestock. The VFMP (section 4.3.1., "Biological Techniques") treats goats and sheep as grazers.

Response to Comment A2-14

"Why was the DPEIR prepared for a Draft VFMP prior to its approval by the BPPC?
The Draft VFMP states on page 6: "After this Plan is complete, the City will complete an Environmental Impact Report, or EIR, on the Plan. *If the DRAFT VFMP is significantly changed and approved by the BPPC, then does the DRAFT PEIR need to be amended to consider the approved version and recirculated for agency and public review then BPPC approval?*

For why a PEIR would be prepared before a project is approved, see **Master Response 5.**

The VFMP has gone through two rounds of comments and revisions. A redlined third draft incorporating public and BPPC comments was attached as Appendix B to the VFMP PEIR. Very minor further revisions have been made based on PEIR comments (see section 4 of this FEIR, Revisions to VFMP). These minor changes improve readability without adding or subtracting significant information. If the VFMP was for some reason suddenly changed before approval in a significant way (i.e., a way that caused one or more of its less-than-significant impacts to become potentially significant, or caused a formerly feasible mitigation measure to become infeasible), then yes, the PEIR would need to be revised and recirculated.

Response to Comment A2-15

"How will other over-story species [besides black oak] *in the area of **5.1 "Ten Mile House" Oak Restoration and Wildfire Resilience Project** be managed, e.g. interior live oak, canyon oak, gray pine?"*

Key project 5.1, "Ten Mile House" Oak Restoration and Wildfire Resilience Project, is in the Upland Mix vegetation type. Therefore, live oaks and gray pine and other species will be managed according to the guidelines in VFMP 4.2.5, "Upland Mix." These guidelines are designed to have the flexibility to be applied differently in different microclimates (e.g. different soils/aspects), but in general, the guidelines prioritize retaining deciduous tree species over evergreen oaks (this only applies in areas sufficiently fire-interval-departed that some trees need to be removed); creating horizontal and vertical discontinuity of fuels by removing shrubs and saplings directly under mature trees; reducing the density of gray pine saplings if they are growing in thick clumps; and otherwise mimicking the effects of wildfire. There is a different set of management guidelines (in the same part of the document) for upland mix areas that have recently burned. For more, see VFMP 4.2.5, pages 37-42.

Response to Comment A2-16

"Will the techniques for application of "cultural fires" be incorporated into prescriptive burn plans required for review of an activity or project's environmental effects in a Consistency Checklist and agency permits e.g. Butte County Air Quality Management District?"

Yes. Just because an activity is an expression of traditional ecological knowledge does not mean the City has the ability to permit it on its lands without some CEQA review. Cultural fire projects on City lands will proceed with the same project review as other projects. That includes BCAQMD permits as required. BCAQMD has the authority to waive certain permits if it determines the smoke impacts are likely to be extremely small.

Response to Comment A2-17

"Does reducing ladder fuels mean the preferred wholesale removal of these naturalized species or solely removing their branches beneath their taller canopy?"

If the ladder fuels in question are the lower branches of non-native tree species *and* the woodland area is already on the denser end of the VFMP vegetation community standards, then it would normally be preferred to remove the entire tree rather than simply limb it up. However, this may not always be possible in every situation depending on nesting season restrictions, limitations placed on streamside work by CDFW, available resources, or other reasons.

"What training constituents [sic] *ecologically trained hand crews, e.g. knowledge of native vs. invasive species, proper pruning techniques?"*

Ecological training for a project will be site- and project-specific and will be tailored to the task at hand by qualified specialists who have experience communicating ecological information. For some

projects, training could be extensive, for others, it could be concise and simple, depending on the work to be done. Training records including trainer, date, topics covered, project or activity, and names of people trained are maintained in the Parks Division front office and are available upon request.

"Is a manual available or to be developed for reference to prescribed field management techniques by ecologically trained hand crews?"
No, training will be site- and activity-specific. An advantage of in-person training is that it can always be tailored to unique site conditions or evolving USFWS/CDFW guidance.

Response to Comment A2-18

"In what cases would native plants need to be targeted for removal as any resort?"

In some areas, vegetation density is outside of the natural range of variation as a result of fire suppression and/or lack of disturbance. Some results of fire suppression could include thickets of numerous ten-to-thirty-year-old gray pines; large even-aged patches of brush instead of a diverse mosaic of smaller clumps and openings; and shade-tolerant species such as evergreen oaks displacing shade-intolerant species like black oak. While fire is an excellent tool for restoring habitat, fire is not always feasible, so fire surrogates (i.e., mechanical removal) are used instead. Guidelines for thinning that could result in thinning native plants are found in the VFMP, section 4.2.

Response to Comment A2-19

"What techniques and practices are to be used for Mechoopda-led cultivation of plants?"

It is up to the Mechoopda to tell the City, during tribal consultation, what techniques they would like to see applied to the cultivation of a given individual, population, or community of plants. Tribal consultation is built into the project consistency checklist process pursuant to CEQA and AB 52. Based on consultation so far, the City anticipates cultural fire (i.e., usually relatively low-intensity and often at the scale of a single plant at a time) and thinning by cutting (as stands of willow) would be logical techniques and practices the Mechoopda might request. The VFMP and some key projects have been written to anticipate and support these practices. Whatever the activity, it would be subject to the same environmental review process under the PEIR as if it was being proposed/implemented by non-Mechoopda people. The City may not be able to accommodate/implement every technique or practice the Mechoopda request. However, the City anticipates that tribal consultation will result in high-quality projects with a strong degree of both ecological integrity and feasibility.

Response to Comment A2-20

*"This statement [*VFMP Pg. 72 "-Utilize Mechoopda-led cultural fire to maintain and nourish "orchard oaks"*] implies that the practice of "Mechoopda-led cultural fire" is without adverse environmental consequences."*

No. By proposing a treatment (such as thinning ladder fuels or removing invasive plants), the City does not imply the treatment is without any adverse environmental consequences. The purpose of environmental review is to understand whether the adverse environmental consequences of a treatment are *significant* or not, and if they are, whether they are nonetheless justified by some beneficial outcome.

Prescriptions for use of fire need to be explicit to understand and evaluate the extent of their potential adverse environmental effects.

The City agrees that burn plans and prescriptions for individual fire projects need to be explicit and

designed by knowledgeable burn managers who understand their potential adverse or beneficial environmental effects. However, at a programmatic burn planning level, it is appropriate for fire prescriptions to be much more general, often specifying just a target vegetation community, objectives, and standard project requirements, as the VFMP PEIR (and, indeed, the Bidwell Park MMP) does.

Response to Comment A2-21

"Why are the prescribed fire standards for burning YST patches in Middle and Upper Park not expressed here? A prescribe fire burn plan needs to be developed for approval by regulatory agencies (e.g. Butte County Air Quality Management District) and application in the field."

Yes. Development of a burn plan and smoke management plan (which indeed will be reviewed and must be approved by BCAQMD) is a requirement for every prescribed fire project in the City. The PEIR is a programmatic document that assumes each project within its scope will receive some additional environmental review through use of the Project Consistency Checklist.

Due to the long 2020 fire season resulting in a shortage of qualified professionals available to complete this task, specific burn plans for the YST in Middle and Upper Park (Project 5.3) are only being developed this month, February 2021. These burn plans will be incorporated into the Project Consistency Checklist prior to the final determination of the project's consistency with the VFMP PEIR. Similar to protocol-level surveys, burn plan development will continue to be a project-by-project process.

Response to Comment A2-22

The following questions refer to key project 5.7, pp. 70-72 in the third draft VFMP. For more details on how project work plans will be written and translated into work getting done on the ground see **Master Response 4: Future Activity Workflow.**

"What are the prescriptions (Best Management Practices) for 'Understory Thin' [;] orchard oak restoration involving the referenced use of fire [;] the cultural fire demonstration area?[;] grassland restoration and management projects?"[; and] the [oak] underburning demonstration site?"

As for all future activities under the VFMP, site-specific prescriptions would be developed by the Director or the Director's delegate based on the standards for the vegetation community, in this case "Valley Oak Woodland" (VFMP 4.2.2) and "Grassland" (VFMP 4.2.1). These standards were written by a team of vegetation and fire experts and reviewed by a Butte County registered professional forester. Tribal consultation would also be conducted to give the Mechoopda Tribe the opportunity to recommend site-specific practices (that are within the scope of the VFMP). In accordance with the PEIR, a burn plan would be developed for each burning activity. This site offers good opportunities for demonstrations of cultural burning activities (e.g., small prescribed fires, as small as a few hundred feet, kindled in low-rate-of-spread conditions under careful control by humans to consume duff, pests and small woody debris underneath large oaks). Grassland restoration and management projects are likely to include planting of native plants and micro-burns of culturally significant individual plants such as deergrass.

Response to Comment A2-23

"Where is this database [created in spring 2020] *of fuels management issues available for use in planning future activities and projects under the scope of this VFMP's PEIR and for public review and general reference?"*

The Miscellaneous Parcels Survey is available from the Natural Resources Manager upon request.

Response to Comment A2-24

The commenter refers to the statement in section 6.5 of the VFMP,

> A programmatic EIR allows managers to "front-load" CEQA analysis in advance. For example, it may include resource inventories of certain areas, so crews do not have to conduct them later.

The commenter asks,
"What resource inventories for certain areas have been done and where are they available for public review and general reference?"

Program-level resource inventories can be viewed in Appendix D of the PEIR. These inventories of special-status animals and plants with potential habitat in Chico were compiled using CNDDB, iPAC, CalFlora, herbarium records, and a wide variety of agency guidance documents to guide reconnaissance-level surveys, protocol-level surveys, and the design of future projects/later activities. These program-level resource inventories will save future surveyors research time and ensure the City applies consistent standards to all its projects. It is still the responsibility of the Parks Division to stay up-to-date on status changes for wildlife and plant species which may have potential habitat in Chico, such as changes in listing status.

As noted above, some project-level resource inventories have also been completed. See **Master Response 3**: **The key projects.**

Response to Comment A2-25

"In the DVFMP I did not find [the following items listed as deliverables in the City's CAL FIRE grant agreement]*:*
*1. A "full Area Burn Plan" including the **5.3 Middle and Upper Park Star Thistle Burns**.*
2. An annual operations schedule to keep the parklands on track optimizing carbon storage;
3. An inventory of at least five major shovel-ready projects that will be ready for funding by mid-2021. They have only generalized project descriptions, lack site-specific biological and cultural surveys and an analysis of their environmental impacts in a Project Consistency Checklist / Initial Study.

1. The full area burn plan is being developed and should be available as a draft by the time this FEIR is circulated to the BPPC and the public. It will be complete by the grant deadline. The specific burn plans for 5.3 (Middle and Upper Park Star Thistle Burns) are also being developed, will also be complete by grant deadline, and will be available for public review upon request.

2. At time of grant award, CAL FIRE presented the City with a change in plans. The City's grant would not be funded through the funding source applied for (California Climate Investments) but rather through Community Wildfire Prevention funding. This change would release the City from having to comply with the provisions related to quantitative greenhouse gas emissions tracking (carbon inventorying) as well as those related to low income and disadvantaged communities. However, the grant performance period would be shortened by one year. For this reason, the City is longer bound to complete this particular deliverable related to carbon storage optimization, which was only included in the grant application to satisfy requirements of the CCI funding source. However, the City still analyzed the carbon/GHG impacts of implementing the VFMP (PEIR section 4.8). Pursuant to CEQA Guidelines §15064(a)(2), it described GHG emissions impacts qualitatively.

3. See **Master Response 3: The Key Projects.**
"Has Cal Fire approved these omissions in the DVFMP? When will Cal Fire receive and then approve the VFMP and its PEIR and release payments for its cost?"

Yes, the City has regularly apprised CAL FIRE of grant progress, expected progress, and expected changes through timely quarterly reports. CAL FIRE has also received each successive draft of the VFMP and has reviewed the PEIR with positive comments. Each invoice to date (most recently on Feb. 4, 2021) has been approved for payment.

The City thanks Mr. Elliott for his comments.

LETTER A3: FRIENDS OF BIDWELL PARK; TOM BARRETT, BOARD OF DIRECTORS

To: Linda Herman, City of Chico, Park and Natural Resources Manager
Wolfy Rougle, Conservation Project Coordinator, Butte County RCD

From: Tom Barrett, Friends of Bidwell Park Board of Directors

Date: Feb. 2, 2021

Comment on the Draft Program EIR for the City of Chico's Vegetative Fuels Management Plan

Please accept these comments on the Draft Program EIR (DEIR) for the City of Chico's Vegetative Fuels Management Plan (VFMP) from the Board of Directors for the Friends of Bidwell Park (FOBP).

General Comments

Editing: An editor would really help documents like this one and the VFMP. Every document produced by a group of individuals should be reviewed by an editor before made public. My comments need editing but due to the lack of time they couldn't be edited. I've made some comments that are "edits" on the most egregious and obvious issues, don't take them personally, we all make writing mistakes.

Bulleted sentences - As a reader I'd rather not be annoyed by poor punctuation. I'd rather be annoyed but by the contents of the document. Bulleted sentences should be punctuated with a period at the end of each bulleted sentence (ref. Shrunk and White, "Elements of Style" and any business writing reference book). Bulleted lists are not be punctuated if the items in the list are not complete sentences.

Table of Contents – Why are Appendices not listed in the Table of Contents?

"1.1 Abbreviations and special terms"

- This heading is item 1.1; however, Section 1.1 in the Table of Contents is Background Information not Abbreviations
- The list provided is a list of "acronyms" not abbreviations.
- Not all the acronyms used in the document are in the "List of Acronyms".
- Formatting is different from other headers, probably from copying and pasting from the VFMP.

Tables

- Tables are used in the document and not titled or listed in a "List of Tables".
- Shouldn't tables be used to highlight something in the body of the document instead of just plopped in to the document?

Table 1 – Key to Impact Levels

- Excuse my incredulity, but is "Key to Impact Levels" really the title of Table 1?

Units – the term "units" is used throughout this document without explanation or description. It mentions "vegetation units", "resiliency units", "vegetation management units" (yet no description of what these units are or how they are defined), and "grazing units". Often "units" are used by itself without context such as "units shall be prioritized", what units shall be prioritized?

Comment A3-1

Comment A3-2

Projects not listed in the DEIR

- Proposed vegetation management projects not specifically listed in the DEIR along with their detailed scopes of work should be reviewed and approved by the Commission prior to the implementation of the project.

Comment A3-3

Scopes of Work

- Missing from the SPRs is a project requirement for developing a project-level scope of work prior to conducting a project that would spell out exactly what is going to be done and how it complies with the DEIR, VFMP, SPRs and Mitigation Measures and any other project level criteria (methods, protocols, expected outcomes etc.) required to be carried out in order to conduct a project properly by anyone, including city staff, volunteers, CCC crews, CDF cews, city staff, contractors, etc.

Comment A3-4

Goals and Objectives

A significant omission in both the VFMP and the DEIR is a consistent and coherent statement of goals and objectives. This is readily apparent in the VFMP where neither goals or objectives are clearly stated as such (objectives are littered throughout the document in various paragraphs and are actually goal statements), while the DEIR provides at least one paragraph of objectives (or goals it is hard to tell) and two different lists of "objectives of the VFMP".

To clarify the difference between goals and objectives; "goals" are the vision statement of a plan, while "objectives" are the achievable outcomes with deliverables designed to fulfill the goal.

Instead of a goal statement the VFMP as a statement of purpose. To further clarify, "purposes" are not goals, goals are created to support a purpose or purposes.

The "purpose" of the VFMP is to describe "actions that the City will take over many years to minimize fire risk and improve other values relating to vegetation on the City's 6,400+ acres of parks, greenways, and open space" (page 3, Third Draft VFMP).

Based on the organization of the document the "purpose" of the VFMP is to "describe actions" to "minimize fire risk" and "improve other values related to vegetation", whatever those may be.

There are a few "objective" statements made throughout the document. The DEIR states what the "objectives" of the VFMP are (see list below) three times but each list is different. One of the requirements of an EIR is that the document be "internally consistent".

According to the VFMP, the VFMP is a plan to "minimize fire risk and improve other values related to vegetation". While the Draft DEIR states on Page 1, that the VFMP is a *comprehensive program of work to protect lives and property and enhance natural resources in the City of Chico.* They are not the same the VFMP wants to "minimize fire risk" while the DEIR states that the VFMP is "to protect lives and enhance natural resources". These are not consistent between the two documents.

The VFMP needs stated goals and objectives to support the goals.

VFMP Goal 1: Minimize Risk of Fire

Objective 1.1 Reduce fuel loading in areas where the City has been negligent in maintaining the open areas of the Valley Oak Woodland.

Comment A3-5

Objective 1.2. Reduce fuel loading around structures by following guidelines.

VFMP Goal 2: Improve Other Values Related to Vegetation

Objective 2.1. Reduce the impact of invasive and exotic plants to City-owned lands.

Objective 2.2. Establish a vegetation maintenance and monitoring program for vegetation units within the City.

Goals and Objectives

The VFMP does not state what the goals of the plan are, it gives a purpose – "Minimize Risk of Fire".

- While minimizing the risk of fire is a laudable goal there is no definition as to what level of risk is acceptable or achievable. The documents contain numerous statements which lead to the conclusion that the level of risk that the City is trying to achieve with the VFMP is ZERO risk and that complete elimination of wildfires achievable. A "zero" risk level is unachievable, short of removing all vegetation; therefore, there needs to be identified levels of risk that are 1) acceptable, and 2) achievable, depending on location and vegetation type.
- The other problem with stating that the purpose of the VFMP is to greatly reduced fire risk is that it leaves the City liable if a fire does occur and gets out of hand and damages property. The case could be made that the City didn't minimize it enough and therefore is liable for damages.

Comment A3-5, continued

Page 4

The Plan would involve reducing the amount of flammable vegetation within designated areas of City-owned lands. Some areas would see a 90% reduction, similar to what could be experienced after a wildfire (e.g., certain very overgrown brushy corridors along evacuation routes or surrounding legacy black oaks in Upper Park). Other areas would see about a 40% reduction (e.g., many denser riparian corridors, where invasives would be removed before any native vegetation is removed). A large majority of acres would see no reduction (e.g., most grassland and blue oak-gray pine areas most years).

- Who will make the determination as to what level of removal of flammable vegetation is appropriate?
- What areas would see vegetation reduced 90% similar to a wildfire? And why would vegetation need to be reduced that much?
- Where are the "legacy black oaks" in Upper Park? There are very few black oaks in the Park.

Comment A3-6

Comment A3-7

Comment A3-8

Improve Other Values Related to Vegetation in the City?

- The second part of the "purpose" of the VFMP is to "improve other values related to vegetation in the City". What other values?

Comment A3-9

Objectives

There are at least three sections of the DEIR that describe the "objectives" of the Plan. The problem with the Plan is that objectives are stated throughout the document and not specifically listed (as demonstrated above) however, while the most each of them are different.

Table 1. Lists of Objectives provided in the Draft DEIR

1.1 Background Information Objectives and content of the Plan – Page 2	**1.4 Alternatives** - Page 13	**2.1.3 Background of Program** Objectives Page 19
The objective of the Plan is to	As stated in the VFMP and described above in 1.1, the program objectives are as follows:	To restore and maintain ecological health and appropriate fire intervals in Chico's parklands, the program objectives are as follows:
- establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface;	○ Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface	○ Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface
- create conditions under which fire, when it does occur, can have beneficial effects in Chico's parkland ecosystems	○ Create conditions under which fire, when it does occur, can have beneficial ecological effects	○ Create conditions under which fire, when it does occur, can have beneficial ecological effects
		○ Fulfill the need for a comprehensive fuels management program for Bidwell Park as expressed in the 2008 BPMMP Natural Resources Management Plan
	○ Make it easier for the City to efficiently complete future vegetation management projects by establishing standard project requirements for all work	○ Make it easier for the City to efficiently complete future vegetation management projects (and increase pace and scale of vegetation management) by establishing standard project requirements for all work

See response to comment A3-5

- reduce the negative effects of parkland fires on structures, lives and natural resources;	○ Reduce the negative effects of parkland fires on structures, lives and natural resources	○ Reduce the negative effects of parkland fires on structures, lives and natural resources
	○ Reduce fire hazard to homes, businesses, and natural resources while continuing to manage natural parks (e.g. Bidwell, Verbena Fields, and the others listed in VFMP sections 2.1-2.5) for natural values, while managing other parklands for their respective primary management objectives as described in VFMP sections 3.1-3.5 (e.g. floodwater conveyance for Lindo Channel, airport safety for airport parcels)	○ Reduce fire hazard to homes, businesses, and natural resources while continuing to manage natural parks (e.g. Bidwell, Verbena Fields, and the others listed in VFMP sections 2.1-2.5) for natural values, while managing other parklands for their respective primary management objectives as described in VFMP sections 3.1-3.5 (e.g. floodwater conveyance for Lindo Channel, airport safety for airport parcels)
	○ Post-fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine, and Valley Oak), create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity	○ Post- fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine) create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity
		○ In grasslands, sustain health and biodiversity (including by fostering good fire) while reducing any threats to homes, businesses or natural resources from unwanted grass fires
		○ In riparian areas, maintain riparian values, including cold water temperatures needed by salmon and riparian buffers' ability to filter sediment, while reducing overgrowth by removing invasive plants first before removing any natives.
identifies and characterizes the City's existing high fire hazard areas,		
presents policies and management actions to reduce		

See response to comment A3-5

parkland fire hazards and impacts in each of the City's five main vegetation communities		
the Plan should and does enhance other values that are meaningful to Chico's residents and visitors, including recreation values; community safety; Chico heritage and historic values; tribal cultural values; ecosystem services such as water supply, conveyance and quality; native biodiversity (i.e., parklands relatively free from invasive species); and habitat for wildlife (including agricultural pollinators) and wildflowers		

See response to comment A3-5

1.2.2 The Key Projects

As a deliverable of the CAL FIRE grant, the Plan also contains seven key Projects which are high priorities for the City and stakeholders. Making these projects "shovel-ready" (i.e., fully reviewed and permitted) was one of the goals of the grant. Therefore, these seven projects have received more detailed planning, mapping, and/or resource surveys using funding from this grant.

- It was our understanding that the "shovel-ready" or "key" projects would be reviewed in the DEIR as they are a component of the Third Draft VFMP.
- Even though it states, "*these seven projects have received more detailed planning, mapping, and/or resource surveys"*. Where is the detailed planning, mapping, and resource surveys? There are only descriptions of proposed projects in the VFMP and no details.

However, site-specific biological resources and cultural resources surveys sufficient for defining project-level environmental effects for these seven projects have, in most cases, not been completed at the time of this DEIR release.

- How can this DEIR be finalized without these projects as they are a part of the VFMP?

After more *detailed planning and design of the projects are completed and the projects are considered for implementation by the City, they will undergo additional review, consistent with Section 15168(c) of the State CEQA Guidelines.*

- An environmental review of each of the projects must be completed before the projects can be "shovel-ready".

If a detailed analysis using the Project Consistency Checklist can document that their impacts are within the scope of the information in the program EIR, additional environmental documentation will not be necessary. If new effects are identified that were not addressed in the program EIR, the Project Consistency Checklist would then serve as an Initial Study to determine the appropriate environmental documentation the City would need to prepare.

Comment A3-10

- The first statement is not true. If there are impacts not identified and addressed by the PEIR then additional environmental documentation will be required and it is stated as such in the next sentence. So why have contradicting statements?

Comment A3-10

1.2.3 Vegetation Management in Cooperation with Private Landowners

- Have the private landowners affected by this PEIR been noticed about this document and plan?

Comment A3-11

1.3 ENVIRONMENTAL IMPACTS AND MITIGATIONS

- Based on the scope of the VFMP and the sensitive habitats within the area there are only three (3) mitigation measures? In a standard EIR the SRPs would be mitigation measures.
- Why were the SRPs not included in the VFMP, but included as the basis of evaluation in the DEIR?
- If the SRPs take the place of mitigations, then there needs to be an SRP Monitoring Plan provide.
- The DEIR suggests that if the SRPs are followed then mitigations are not necessary; however, in Sec. 3.5 it states that the "*SPRs will form a starting point for the composition of a mitigation and monitoring plan, or MMRP.*" Therefore, by including SPRs in the proposed projects, mitigation measures will have to be developed on a project-by-project basis through a MND?
- Why are the SRPs in the DEIR twice, in Section 4 and Appendix C? But not in the VFMP?
- Mitigation Measure BIO-1a is the same as Mitigation Measure BIO-1b; except BIO-1a addresses wildlife and BIO-1b plants. Why is it necessary to create two mitigation measures that address the same thing?
- One mitigation not addressed is the "no project" mitigation measure. If impacts from proposed project activities cannot be mitigated to a "less than significant" level based on environmental analysis of future projects, then "no project" will mitigate it.
- Mitigation Measure SOIL-1 (MM-SOIL-1), on pages 88 and 115, does not appear to exist in the document or in Table 1.

Comment A3-12

Page 12 Impact HYDRO-1

- What is a "qater"? It is supposed to be "water".
- "*...if they remove all vegetation.*" Who is they? How can "they" remove all the vegetation in a given streambank area if the proposed work plan is to cut back Arundo and plant native plants directly into the root ball and not to remove all vegetation?
- Maybe a less confusing statement would be "Arundo eradication activities that remove a significant amount of vegetation may result in an adverse impact to the bank or creek-bed."

Mitigation Measure Hydro-1

- How is Mitigation Measure Hydro-1 a mitigation measure? The measure describes the proposed revegetation activity.

VFMP S.6 Little Chico Creek Arundo Management

4. *When a patch of arundo is dead, plant willow and other native plants into and around the root ball at optimal, fire-safe densities.*

Comment A3-13

1.3.4 Significant unavoidable impacts and irreversible impacts.

Because the "project" in this case is approval of a Plan, CEQA requires the City to disclose any significant unavoidable impacts and any significant impacts that would be irreversible (§21100(b)(2)). Since the City finds no significant impacts would remain after mitigation, there are no irreversible nor unavoidable significant effects.

- It does not look like any impacts were analyzed for the specific projects outline in the VFMP, so how can you state that "the City finds no significant impacts after mitigation"?
- Supposed the two mitigation measures will be used when "irreversible and unavoidable" impacts are caused by a project. Compensation mitigations are used when "irreversible and unavoidable" impacts are caused by a project. Purchasing land in another location to offset any "irreversible and unavoidable" impacts does not result in no "irreversible and unavoidable" impacts at the project site.

Comment A3-14

1.4 ALTERNATIVES

Program Objectives

Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface

- Is the objective to "reduce the likelihood of unwanted ignitions" or to reduce the likelihood of catastrophic fires? The VFMP states that the purpose of the Cal Fire grant was fire prevention; however, nothing in the VFMP addresses "fire prevention" but it address how to manage vegetation to minimize catastrophic damage once a fire does start, which the VFMP states will periodically happen. In fact, the document states that the control of fires has caused the increase of vegetation fire hazards; therefore, once a fire ignites the best practice would be to let it burn. Is "ignition" in a fire fuel managed area is a good thing?

Comment A3-15

Post-fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine, and Valley Oak), create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity

- What does "post-fire" mean? Post which fire?
- This objective is to thin out "excessive" (in someone's opinion) vegetation and create open stands of well-spaced trees in all the plant communities identified in the plan.
- Cut off all the "extra" stems of remaining trees. How is this managing for "natural" values? Many trees and shrubs have many branches and the VFMP calls for removing all "extra" branches except a main branch and create a Central Park out of Bidwell Park? If the "natural" fire-return rate is 5 - 12 years, then native, natural growing multi-branched plants will sprout many branches during that time period. If a fire occurs, they may burn, so what? Are they necessarily a "ladder fuel"? If they are not a "ladder fuel", which has not been defined in the VFMP or DERI, should they be hacked up?

Comment A3-16

1.4.1 No Project Alternative

While it stands to reason that there would be an increased risk of "larger and more damaging wildland fires" without implementation of vegetation management for fuel loads in the foothill area of

Comment A3-17

Chico/Bidwell Park, even as Upper Park has had four fires in the past 20 years which should have reduced fuel loads.

A Paradise-like fire, which was classified as a wind-driven "ember fire", due to the blowing embers from trees and buildings that ignited areas is not likely in or around Lower Park. The Camp Fire developed over a period of hours and was driven by an extreme wind event westward towards Concow and Paradise. The topography, vegetation fuel type (chaparral), dry conditions, and low humidity made this area prone to rapid burning. All of these conditions are present in the Upper Park area of Bidwell Park and throughout the entire foothill area of the Central Valley.

The risk of catastrophic fire in Lower Bidwell Park, while claimed to be extreme based on the LIDAR analysis in the VFMP, is, as the Fire Chief stated, "Not that risky due to vegetation, topography, and wind patterns." Within the City of Chico, any area of Lower Park is reachable by fire suppression personnel within minutes of a report of an ignition. Two fire stations are literally across the street from the Park, not miles away as was the case with the Camp Fire and the other wildland fires in California. Even during drought times Lower Park vegetation has high moisture content due to Big Chico Creek, a high easily tappable water table, and vegetation that is less ignitable (very few pines and chapparal plants) and have higher water content (wild grape, riparian species, pipe vine, English ivy, periwinkle, and blackberry). This past fall four fires broke out in Lower Bidwell Park by illegal campers and were extinguished quickly and did not spread even though it was prime fire season. It doesn't mean Lower Bidwell Park can't burn but the classification of Lower Park as extreme hazardous condition expressed in the VFPM due to the vegetation content belies the actual fire hazard that is substantially lower.

Sec. 2.1.2.
Current and past fire suppression policies have resulted in large accumulations of vegetation on hillsides to the east of the City.

- Parts of Bidwell Park have burned in the past 20 – 30 years, some areas more than once. These fires are allowed to burn in an area but are "controlled" before they get "out of control". Haven't these burns reduced fuel loads in Upper Bidwell Park?

Comment A3-17, continued

As wildland vegetation continues to accumulate and land development expands into the urban-wildlife interface, there is an increased potential for loss of life, structures and natural resources.

- Is it the responsibility of the City of Chico to protect development that encroaches onto wildlands or is it the responsibility of the developers to provide adequate setbacks and fire management activities to protect the development?
- The DEIR should contain land use measures for inclusion in the City's General Plan Land Use Element addressing the urban/wildland interface to minimize the impact of urban encroachment into fire-prone wildlands and to reduce the fire hazards associated with development next to wildlands, such as:
    - Require single-loaded streets along a wildland interface.
    - Maintain green vegetation on medians in fire-prone areas to minimize fire spread from wildland to urban settings.
    - Maintain a shaded fuel breaks along roadways skirting open wildlands and backyards of residential areas abutted to a wildland area.
    - Require non-flammable fencing along urban/wildland interface.
    - Require roof-top sprinkler systems on all structures adjacent to open areas.

Comment A3-18

- Require structures to be at least 100 feet from the fence line or wildland edge of single-loaded streets.

Comment A3-18, continued

"..suppression of these cultural fires is a primary cause of the wildfire crisis California is enduring today"

- What are the references for this claim? Dozens of causes for catastrophic wildfires can be identified in addition to this claim. It is well established that suppression of natural, non-cultural fires is a major cause of California's wildfire crisis, as it drought conditions, human encroachment into fire prone areas, etc.

Comment A3-19

Page 18

Lindo Channel needs to provide a flood control function, be aesthetically pleasing, and provide recreation and safe non-motorized transportation opportunities for residents.

- Lindo Channel provides flood control function now, but it was the primary creek flow until the diversion of Little Chico Creek through town. Lindo Channel was given to the State of California for a state park by Annie Bidwell, so there was a park purpose to the land originally.
- What recreation and safe non-motorized transportation opportunities does it provide? There are no formal trails or bike paths in or along the Channel. There are two pedestrian bridges providing non-motorized transportation across the Channel but that is it.
- The City of Chico has owned it since the mid 1990's but has yet to develop a plan for its use and functions.

Comment A3-20

Page 20

In riparian areas, maintain riparian values, including cold water temperatures needed by salmon and riparian buffers' ability to filter sediment, while reducing overgrowth by removing invasive plants first before removing any natives.

- There should be no reason to remove native plant species in riparian areas. Native plant species should be encouraged not removed. The risk of a catastrophic fire in a riparian zone, while ever present, is not as great as the fire risk in drier and higher plant communities. Grape vines cover a lot of the riparian areas and are considered by the Plan to be "ladder fuel"; however, it is really hard to burn riparian vegetation with high water content and therefore isn't a great a threat. The City's Fire Chief even stated as much when asked about the risk of fire in Lower Park.

Comment A3-21

Page 22 Map – Managing Valley Oak

Select healthiest trees, thin to average 70 trees/ac. Chip cut/downed woody material <4"; >4" can be chipped or left (10' from nearest trunk) based on site conditions. Remove invasives first before removing any natives as a last resort.

Grazing, with grazing plans and enough creek setback. Consider protecting young oaks from herbivores. Promote native biodiversity/productivity.

- Who is to determine what are healthiest trees? Is that an appropriate criterium?
- Will the trees to be "selected" to remain in an area to be thinned native trees or any trees? The VFMP states that non-native woody species should be removed "where they compete with Valley oaks for light or are touching canopies". This map states that invasives should be

Comment A3-22

removed first and is not consistent with the VFMP. Shouldn't all non-native woody species be removed, period, before thinning out native trees?

- Where does the 70 trees per acre come from? Why was this density selected?
- The VFMP also states that woody material <4" can be left on the ground as can material >4". Chipping should be kept to a minimum to prevent the killing off of annuals and grasses. Why is dried, chipped woody material not considered to be a fuel (per Jim Dempsey), but leaves, branches, and small woody debris on the ground is? The document recommends raking this material away from bases of trees before prescribed burns because it might ignite. If that woody debris will ignite why won't chipped material?
- Does the 70 trees per acre apply to the entire park or just areas where there are too many trees such as the Petersen walnut orchard?
- There are a number of plants that should be protected from grazing including elderberry, California blackberry (*Rubus ursinus*), Western Blackberry *(R. leucodermis*), coffee berry, and other native plants that should be encouraged to grown and now mowed down by goats.

Comment A3-22, continued

Page 23 Map – Managing Riparian Corridors

• No fuelbreaks; minimize disturbance; no canopy reduction >50%; but target ladder fuel treatments at edge of riparian corridor to protect it

• Remove invasives first, natives as a last resort.

- There are numerous invasive trees in the riparian corridor which need to be removed (Catalpa being the primary one) and there should be no need to remove native trees or plants.
- How is the "edge of the riparian corridor" defined? The riparian corridor in Lower Bidwell Park is bounded by a permanent fuel break – South Park Drive and Petersen Drive. These roads provide an effective barrier through the entire lower park.
- Why are grapes considered a ladder fuel? They don't burn unless they have been cut and have dried out by people treating them as a ladder fuel.
- Other regulations regarding plant removal apply in a riparian corridor.

See response to comment A3-21

Comment A3-23

Page 24 Map – Managing Blue Oak-Gray Pine

• Prioritize thinning dense undergrowth under gray pine < 150 ft from Upper Park Rd

• For young gray pine thickets in managed areas (including off this map), thin thickets to 10 saplings/ac selecting healthiest. Always try to retain blue oaks.

- Why thin undergrowth <150 from the road under gray pines? Why 150 feet? How far around the gray pine? Just underneath the gray pine or from the road to the gray pine?
- Always "try" to retain blue oaks? Should say "Always retain blue oaks"!

Comment A3-24

2.3 STANDARD PROJECT REQUIREMENTS (SPRs); LATER ACTIVITY REVIEW PROCESS

- The SPRs are provided twice in this document Section 4 and Appendix C. Why?

See response to comment A3-12

- The DEIR states that SPRs are best practices, and that the VFMP identifies best practices to be used. I'm confused, why would you have two separate project requirements? Which set of best practices are supposed to be used?
- For future projects (not later activities) not identified in the DEIR, will the City will develop a project with the best practices from the VFMP and apply the SPRs which are considered exempt from environmental review once passed in the DEIR?
- SPRs are NOT construction standards. There are a lot of

See response to comment A3-12

Page 26. *In case a future activity on City parklands is proposed, sponsored or carried out by another agency, the project consistency checklist is designed so it can also be be used by any other "project proponent". For example, CAL FIRE or the Wildlife Conservation Board might fund a future vegetation management program in Chico parklands; both these State agencies may serve as lead agency on the projects they fund, so they could utilize the Project Consistency Checklist to finalize review for these projects (with City assistance).*

- Edit "be be".
- Funding a program does not make the funder the lead agency for a project under the City's jurisdiction, does it? If not, what's the point of this statement?

Comment A3-25

2.4 Environmental Review and Public Participation

Page 27. *The draft VFMP was completed in 2020.*

- The draft VFMP was not completed in 2020. The DEIR was released along with the "Third Draft VFMP". The VFMP has not been finalized at this time. A final draft VFMP has not been released, yet the DEIR is being reviewed.
- For example, a seventh project was added that has not been review by the public.

Comment A3-26

Detailed vegetation management work plans have been defined for certain specific areas (these are the key projects, sometimes described as "the shovel-ready projects,") while for other areas, the work plans are far more general.

- The VFMP contains seven project descriptions, none of which could be considered "detailed vegetation management work plans". When will the City provide actual shovel-ready work plans?

Page 28. *As noted above, it is not possible to fully evaluate certain impacts today because the nature and extent of the proposed vegetation management actions at a specific work site are not sufficiently defined, and/or information about site-specific resources is lacking.*

- This statement seems to apply to the seven shovel-ready or key projects in the VFMP. Does it?

Comment A3-27

2.6 PERMITS AND APPROVALS; AGENCY RESPONSIBILITIES

Implementation of the proposed Plan will require formal adoption of the Plan by the Bidwell Park and Playgrounds Commission and the City Council.

- In addition to formally adopting the PEIR and VFMP the Bidwell Park and Playground Commission (BPPC) has chartered authority to approve any and all proposed projects, which also means environmental documents, for Bidwell Park, creekways and greenways, and other open space under the authority of the BPPC. Why isn't the BPPC role in approvals addressed here?

  Section 1006.1. The Bidwell Park and Playground Commission - Powers and duties.

  The Bidwell Park and Playground Commission, except when suspended as provided in this Charter, shall have the following powers and duties:

  A. The power and duty to operate and maintain all of the parks and playgrounds owned by the city and to adopt such rules and regulations as may be necessary to govern and control the use of such parks and playgrounds.

  B. The power and duty to provide for the propagation, planting, removing, pruning and maintenance of all trees and shrubberies along the streets and sidewalks of the city and to adopt such rules and regulations as may be necessary to govern and control the planting, removal, pruning, and maintenance of such trees and shrubberies

- The BPPC is authorized to approve project proposals identified in the VFMP, review environmental documents associated with said projects, receive public input, modify proposals as needed, and approve projects. Projects conducted under the VFMP and PEIR still require Commission approval and should not be implemented until a thorough and documented project proposal, work plan, mitigation plan, and monitoring plan is in place for each project conducted under the VFMP.

Comment A3-28

3.1 Key Projects

The VFMP contains seven "Key Projects," sometimes called "the shovel-ready projects," which have received and/or will receive an elevated level of environmental review using the CAL FIRE grant funding. This extra pre-planning and surveying is intended to make these projects easier to fund through future grants (i.e., to make them "shovel-ready"). For this reason, these projects are sometimes called "the shovel-ready projects". They are listed in VFMP section 5. All have project boundaries and descriptions; in some cases, botanical and cultural resource surveys have been completed. The projects do not necessarily have secured funding sources.

- Where is the "elevated level of environmental review" for any of the seven projects? It doesn't appear to be in the DEIR.

See response to comment A3-27

3.3 Vegetation Management in Cooperation with Private Landowners

- Have private landowners affected by the scope of the VFMP been noticed about the DEIR and the VFMP?

See response to comment A3-11

3.4 Vegetation Management Methods and Standard Project Requirements
Standard Project Requirements (SPR)

Page 31. *The City has identified various Standard Project Requirements (SPRs) to reduce environmental impacts of the vegetation management actions. ..... SPRs can be thought of as "best management*

practices" that an agency or land manager chooses to adopt as binding policies. They then serve as a basis for analysis of impacts.

- If "standard project requirements" (SRPs) are "best management practices" (BMPs) shouldn't they be listed in the VFMP as part of the Plan, instead of introduced here in the DEIR? Why weren't they?
- Why were the SRPs not included in the VFMP so that they could be review and commented on during that time period since they are an integral part of the Plan?
- Will the public be able to comment on each of the SPRs prior to implementation on vegetation management projects?

See response to comment A3-12

- Practices are not policies! Policies can incorporate practices, but they are not the same.
- An SRP or BMP (why use two different terms for the same thing?) may not in and of itself have an environmental impact but depending on how it is applied may have a significant impact, so shouldn't each project evaluated?
- What if an agency or land manager chooses not to utilize the SPRs from this document on a project, does that make the DEIR null and void and require a full EIR?

Comment A3-29

What is the purpose of the SPRs?

The following paragraph is SPR-BIO-5:

If it is determined through application of SPR BIO-4 that special-status wildlife or occupied wildlife nursery sites (e.g., nests, dens, bat roosts, burrows) are within the treatment boundary and the treatment cannot clearly be applied without harming the wildlife or impacting the nursery sites, the project proponent must physically avoid the area occupied by the wildlife by establishing a no-disturbance buffer around it. This buffer boundary shall be marked with high-visibility flagging, fencing, stakes, paint, or clear, existing landscape demarcations (e.g., edge of a roadway). Buffer size will be determined by a qualified RPF or biologist, in consultation with CDFW and/or USFWS (depending on the potentially affected species), using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 500 feet for special-status birds and 100 feet for other special-status wildlife species, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. These judgements will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below these minimum standards around an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the Project Consistency Checklist. Consideration of factors such as the species' tolerance to disturbance, the presence of natural buffers provided by vegetation or topography, the height of the nest, the locations of foraging territory, the baseline levels of noise and human activity, and the nature of the treatment activity, among other factors, may inform an appropriate buffer size and shape.

- The DEIR states that SPRs (Standard Project Requirements) are best management practices and a basis for impact analysis. I assume, because they are project requirements, that they will be actually turned into a set of project standards and included in the work plan.

See response to comment A3-4

- How is one supposed to comprehend this paragraph?

Comment A3-30

- How is one supposed to implement this? If the expectation of the "Standard Project Requirements" is that they are to be used by a project implementer, will they have to read each one and interpret it for their project?
- Who is responsible for turning these SPRs into a usable format and a scope of work?
- Will there be an implementation guidance document produced so that project supervisors and workers can understand how they are supposed to implement these "standard" requirements?

Comment A3-30, continued

See response to comment A3-4

If the project with SPRs incorporated could have significant impacts, then additional mitigation measures are added. In other words, SPRs are incorporated prior to impact analysis, and mitigation measures are added afterward.

- How does it work when you state in the DEIR that the SPRs will have no significant impact when they don't apply to any specific project? Impacts or BMPs or SPRs is project specific and can't be evaluated without specific project.
- If a project, with the incorporated SPRs, needs to be mitigated doesn't that require an environmental impact analysis?

See response to comment A3-29

Page 31. *The application of the SPRs would be specified in the individual work plans for the vegetation management units. After environmental analysis, the City identified rare cases where additional environmental protection measures could be needed to mitigate potentially significant impacts. These additional measures were developed and are presented as mitigation measures in Section 4 as well as Table 1 above.*

- Are those work plans to be developed or the ones in the VFMP?
- What is a vegetation management unit? Is it a location or a specific "project"?
- Staff will have to prepare an environmental assessment for every project not included as the "key" projects in this document?
- What rare cases did the City identify?
- The past tense is used to indicate that environmental analysis was done, but then the future tense is use to indicate that additional measures "could be needed" before going on to state that, "*These additional measures were developed and are presented as mitigation measures in Section 4 as well as Table 1 above.*" Not sure how this works, please explain.
- So additional mitigation measures could be needed when incorporating SPRs on a project but SPRs are presented as activities that are not needed to be mitigated?

They are to be developed, based on the VFMP.

"Units": See response to comment A3-2

How does this work?

1. A specific fuel reduction project is developed for a specific area (vegetation unit).
2. The work plan for the project incorporates appropriate SRPs into the work plan.
3. An environmental evaluation of the work plan with the SRPs is conducted using the Project Consistency Checklist (aka Environmental Checklist).
4. If the Checklist or the person conducting the environmental review identifies significant impacts, mitigation measures will be added to the work plan to render the impacts to less than significant.
5. The project receives a mitigated negative declaration (MND), and the project can proceed with approval from the Park Commission.

Comment A3-31

3.5 Post-Treatment Monitoring and Maintenance

Maintenance of vegetation management areas generally involves the same treatments as the original project or activity (sometimes at a lower intensity or narrower scope) and, in the absence of significant changes in resources or their sensitivity at the activity site, would usually be implemented without additional environmental review, since it would remain under the scope of the environmental document that authorized the original work.

- How would one know if there were changes to the resource or sensitivity at the project site without conducting an environmental review?

Comment A3-32

Page 32. *The responsibility for maintaining the vegetation in the original work area in a non-hazardous condition, or for conducting future vegetation management generally resides with the City (but may reside with an adjacent landowner, if involved, depending upon the terms of the Letter of Understanding between the City and the landowner). Individual Letters of Understanding will specify if there are any penalties to either party for failure to conduct the agreed-upon post-treatment vegetation management.*

- The VFMP was developed for City property, not adjacent property, how can it be applied to adjacent landowners without their involvement?
- Do the adjacent landowners know about this?
- Since they could be impacted were adjacent landowners notified about the public hearing on this document?

See response to comment A3-11

4. ENVIRONMENTAL IMPACTS, 5TANDARD PROJECT REQUIREMENTS, AND MITIGATION MEA5URE5

4.1 Aesthetics
4.1.1. Existing Conditions

Page 34. "*creating and maintaining beautiful public spaces is a central responsibility of parks managers.*"

- While park managers are responsible for maintaining public spaces the responsibility for creating and maintaining public spaces in the City of Chico is under the BPPC. The park manager carries out the decisions of the Commission.
- Beauty is in the eye of the beholder. Leaving a subjective value up to a park manager is not desired. Bidwell Park and some of the other creekways in Chico are "natural" undeveloped parks not manicured parks. There are sections of "manicured" areas within the Park that meet the definition of a city park and are maintained to a manmade park aesthetic. When the Bidwell Park Master Management Plan was developed, the Park Commission made it abundantly clear that the Park was not to be managed to the aesthetic of a manmade park like Central Park or Golden Gate Park, it was to be a "natural aesthetic".

  Even so, judgement calls on the part of Park staff relied on their aesthetic sense and not on the aesthetic of the BPMMP. For example, when asked why downed trees were removed in an area a few years ago, the Park staff person responsible for the activity said, "It was getting really ugly here and we need to clean it up." The policy of the BPPC was to leave all downed wood in the Park unless it fell on a roadway or trail, it was not to remove it because someone considered it ugly.

Comment A3-33

The aesthetics of public spaces is up to the Bidwell Parks and Playground Commission.

The overall effect, in almost every case, will be to lift and lengthen sightlines. People will be able to see farther when walking in parks and greenways

- Yes, removal of the dense undergrowth of invasive, exotic plants will open up the vistas within areas of the Park and improve the aesthetic greatly and is in keeping with a "natural" look. However, "raising sightlines" for "public safety" is NOT a specific fuel reduction strategy and NOT a policy of the Park Commission. It has been done under the guise of public safety to discourage camping and to allow police to cruise and look without getting out of their vehicles. This practice was started by the police department and conducted without compliance with the BPMMP or Commission concurrence, who have charter authority over the management of the Park.
- Lifting and lengthening sightlines is not the aesthetic of a "natural" park. This is an aesthetic of fear designed to comfort people who fear that there is an "other" person hiding behind every bush and shrub going to attack them.
- The Plan and this document call for the removal of all lower branches of all trees and shrubs. This is NOT the aesthetic look addressed in the BPMMP and should not be considered an objective of the VFMP. It is not, and has not been Park Commission policy to raise all sightlines throughout the Park and should not be pursued.
- The natural, native shrubbery in the Park should not be manicured and raised. Spice bush, red bud, coyote bush, native blackberry, coffee berry, elderberry, bay, madrone, and other native shrubs are bushes with multiple branches arising from the root.
- Calling any vegetation with branches, leaves, and stems within 8 feet of the ground a "ladder fuel" and trimming it up is also a current practice that is used as an excuse for curbing camping. First of all, the plant will respond by sending up shoots from the base of the plant and second, most of the time, especially in Lower Park, it is actually not a hazardous condition and not a ladder fuel, by definition.
- The "other" problem with raising and lengthening sightlines is destroying the habitat and nest of wildlife in the Park. Wildlife is reliant on these shrubby plants for food, nests, and protection from predators. This "aesthetic" will have a significant impact on the wildlife of the Park.
- Prescribed burns, while a necessary also create an "ugly" look until the next seasonal rain can regrow the grasses. If sections or "units" are burned off in a patchwork then the park will forever have a burned over look.
- Unless there is an active public relations campaign by the City, residents will complain about the aesthetics of a burn-over park.

4.1.2 Thresholds of Significance and Impact.

- "Less than a significant impact" is checked off yet the document states that where will be a significant impact to the "vistas" by lengthening and raising sightlines. The second part of the question here is the adverse nature of the impact. To many it will be adverse, to others not, to the writers of this document it is not adverse.
- What is not addressed is the visual impact of burnt parkland.
- Recent vegetative fuel load projects in the Park resulted in leaving hundreds of stumps scattered throughout the project area. Instead of removing the small stumps the trees were cut withing a foot of the ground and in some cases a herbicide was applied to kill the stump. 90% or more of

Comment A3-34

the trees that were removed could have been removed by hand with a weed wrench, Pulaski, or shovel. Instead, an unsightly forest of foot high stems and trunks are now present. It is aesthetically ugly, and many have resprouted. Removal methods need to incorporate an aesthetic to them, if a plant can be removed it should be removed, not cut to stump level. In other cases, stump grinding should be considered.

Comment A3-34, continued

4.3 Air Quality

4.3.1 Existing Conditions

Page 44. *...the District's two recommendations for mitigating impacts to below a level of significance were adopted into this EIR (see 4.3.4).*

4.3.4 Mitigation Measures

Since impacts would be less than significant, no mitigation is required.

- Where are the two recommendations for mitigating impacts in Section 4.3.4?

Comment A3-35

Emissions from wildland smoke.

- This section describes the toxic smoke from recent fires that burned structures. The City of Chico wildlands have few or no structures that would be consumed by a wildfire, so this comparison is not compatible with wildfires in Bidwell Park. A fire burning in Bidwell Park would also burn adjacent foothill lands that are similar in nature to Upper Bidwell Park. Prescribed burns would never offset wildfire burns, especially if they are not suppressed and allowed to burn.
- There is no way to quantify the reduction in wildfire smoke due to the implementation of the VFMP or make the prove the statement that implementing the VFMP in the Park would reduce wildfire smoke, especially if fires only occur on a 5 -15 year basis and if the fire runs outside the Park where no fuel reduction activities are conducted on private property.

Page 44. *Implementation of the VFMP would create an increase in smoke from prescribed fire, which could have air quality impacts. However, implementation of the VFMP is also expected to create a decrease in wildfire smoke which could offset these impacts.*

- Prescribed fires will have a smoke impact that may or may not be offset by some future fire. This statement assumes that if a wildfire occurs once every 10 – 15 years and burns for a few days the amount of smoke generated would be greater than conducting 10 – 15 years of prescribed burns over a greater area. I don't think so.

Smoke Management Plan

- The DEIR states that a Smoke Management Plan will be developed when prescribed burning will occur; however, it doesn't not state what is required in s SMP or who is responsible for producing it. In one section is states that the City will get an SMP from BCAQMD and in other places it says that an SMP will have to be developed prior to a prescribed burn. Which is it?
- This document and the VFMP list a SMP under needed regulatory permits. A SMP is not a permit, it is a requirement of a burn permit.

Comment A3-36

4.3.2 Thresholds of Significance and Impacts

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact

The program will not result in emissions other than those mentioned above.

- It does not appear that health effects of prescribed burns have been considered. Sensitive receptors, individuals with respiratory issues, may be impacted by smoke from prescribed burns conducted in, on, or around residential neighborhoods or in vehicles on roadways impacted by smoke.
- In addition, a significant health effects of smoke from burning poison oak in Lower Park has previously resulted in the City being sued and prescribed burns in Lower Park stopped. Respired poison oak is extremely problematic in sensitive individuals.
- How will these issues be addressed in the EIR and Plan?

Comment A3-36, continued

4.4 Biological Resources

4.4.1 Existing Conditions

Butte Regional Conservation Plan (BRCP)

- Since the BRCP is not in effect and doesn't pertain until or if it is adopted why was it included in the DEIR?
- If or when it is adopted how will it affect the VFMP?

Comment A3-37

4.4.2 Thresholds of Significance

The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment.

- How is an RPF or biologist qualified to conduct a biological assessment suggested in SPR BIO-1? I know plenty of biologists who could not conduct such an analysis even though they have a degree.
- What it the qualification criteria for RPFs, biologists, botanists, biological technicians, environmental planner, etc., to conduct reconnaissance-levels surveys?

Comment A3-38

SPR BIO-1: Review and Survey Project-Specific Biological Resources

2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.

Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below

- Why would this finding necessitate "further review and surveys"? If the determination is made that "adverse effects cannot be avoided" shouldn't that stop the implementation of the proposed treatment?
- Isn't this a "significant unavoidable impact" requiring mitigation measures?
- SPR-BIO-5 states that if there are "special-status wildlife or occupied wildlife nursery sites and treatment cannot be applied without harming or impacting" the site, then the area should be physically avoided, not studied further.

Comment A3-39

SPR BIO-2: Biological Surveyor Qualifications.

All field survey professionals/biological technicians conducting surveys under SPR BIO-1 and SPR BIO-4 should demonstrate regionally appropriate knowledge of species and protocols.

The list of professions in the first four SPRs include:

- SPR-BIO-1 states that a "qualified RPF or biologist" be utilized to conduct surveys.
- SPR-BIO-2 states that "field survey professionals/biological technicians" conduct surveys and that a qualified person only have appropriate knowledge of species and protocols. Who determines what "appropriate" is? What is a "field survey professional"? What are the qualifications one of those? What is a biological technician? What are the qualifications one of those?
- SPR-BIO-3 states that a "botanist" should conduct surveys.
- SPR-BIO-4 states that a "qualified RFP" or a "biological technician" will be required to perform a protocol-level survey.
- SPR BIO-6: Require Ecological Knowledge Training for Workers this SPR states training will be provided by a "qualified RPF, botanist/biologist, Master Gardener, arborist, or City staffer." Now the list of qualified personnel includes Master Gardeners, arborists, and City Staff. What makes them qualified?

What is the *regionally appropriate knowledge of species and protocols* these individuals are supposed to demonstrate? That is pretty vague as are the people doing this. A RPF doesn't necessarily have local botanical knowledge, or local wildlife (birds, mammals, insects, other animals, etc.), but might be a wealth of knowledge on local tree species. A biologist may be familiar with animals but not plants. A botanist may be family with plant species but not animals.

Comment A3-38, continued

SPR BIO-3 Integrate EDRR into Reconnaissance-Level Surveys

During reconnaissance-level surveys, the surveying botanist shall identify any infestations of invasive plant species

Great measure and badly needed in the City of Chico.

This section identifies a botanist as the "qualified person" conducting the surveys, as opposed to an RPF or biologist, and I agree that a botanist should be the specialist conducting these surveys; however, is the botanist acceptable to also collect information about terrestrial and aquatic wildlife that may be affected by a proposed project.

Is a third level of expert required to conduct these surveys?

Is this survey limited to only botanists?

SPR BIO-4: Protocol-Level Surveys.

If SPR BIO-1 determines that sensitive natural communities or sensitive habitats for plants, wildlife, or both may be present and adverse effects cannot be avoided, the project proponent will require a qualified RPF(s) or biological technician(s) to perform a protocol-level survey of the treatment area prior to the start of treatment activities.

I don't understand this section. The SPR-BIO-1 item should trigger a protocol level survey, period, for every project. If impacts can be avoided or mitigated, then the project can proceed. If adverse effects cannot be avoided or mitigated, then the project should not be conducted at that location or area.

Comment A3-40

SPR-BIO-5: Flag rare plants or wildlife/wildlife nursery sites for avoidance when needed.

BIO-5a: Flagging and Avoiding Sensitive Wildlife or Nursery Sites

- So, all this verbiage is for avoiding sensitive areas by flagging? It should be much simpler than this prescription.

When buffers cease to apply. *When the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, roost, or other occurrence is no longer active; or reducing/abandoning the buffer would not likely result in disturbance, mortality, or injury, then activity may resume inside the buffer zone. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of special-status wildlife, the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species.*

- When "buffers cease to apply" then activities can be conducted in the buffer zone, right? Simple.
- This section states that if a qualified RPF or biologist determines that the reason for a buffer is no longer valid, then the activity can resume (I suppose begin too?) in the buffer zone. Then goes on to state that a qualified RPF or biologist is required to monitor the effectiveness of the no-disturbance buffer. How does that work? If no buffer is required why would they need to monitor it? This paragraph makes no sense.

Comment A3-41

Bio-5b: Flagging and Avoiding Special-Status Plants

- Why a separate topic? This same paragraph was presented in Bio-5a, can't it be simplified into one item so that we don't have to try to read all this all over again. This can be one item "Flagging and Avoiding Special-Status Habitat".

For ways plants differ from animals, see response to Comment A3-12[E].

SPR BIO-6: Require Ecological Knowledge Training for Workers.

- Who is going to train the trainers to the requirements of the DEIR, SPRs, VFMP, etc.?
- Any training activity should be documented by what was the training, who was trained, and who did the training.
- Work practices are not necessarily "ecological training".

Comment A3-42

- Will a guidance document be developed for workers from the DEIR and VFMP? They shouldn't have to try to read and understand this document or the VFMP.

Comment A3-42, continued

SPR BIO-7: Prevent Spread of Invasive and Noxious Plants.

- What about pathogens?
- This section did not include minimizing or eliminating the spread of invasive or noxious plants or pathogens via animals used to graze. Goats brought in from grazing in a different area will bring in all the seeds from that area in their digestive systems and packaged in their own fertilizer ready to sprout. Unless purged prior for a few days or weeks to grazing a new area they will become effective spreaders of invasives and noxious plants. This can be seen in Lower Bidwell Park where thousands of turkey mullein plants popped up months after the goats grazed there once it rained. Of course, they could have eaten the mullein on site and further spread it throughout Lower Park.
- Timing the removal of invasive, noxious, and exotic plants is also critical. If a species is removed after seed set then it is likely to replenish the seed bank and continue to be a noxious presence. Depending on the species plant removal should be conducted at appropriate time to stop the further propagation of plants.

Comment A3-43

SPR BIO-8: Trees Marked For Removal by Qualified Personnel.

No native tree shall be removed (a "tree" is defined for the purposes of this section as larger than 8" DBH) unless marked beforehand by a qualified arborist, botanist, Registered Professional Forester, or City staff member with adequate training. If the marker and remover are not the same person, it is of paramount importance that tree fellers/removers understand and interpret the marking system the same way as the marker(s).

- Why the limitation to trees larger than 8" DBH?
- Does this mean that trees smaller than 8" DBH can be cut down at will by anyone?
- This item should say:
  "No tree of any size, shall be removed unless identified and marked for removal by a qualified person."

Comment A3-44

SPR BIO-13: Chipping.

- Four (4) inches may be too deep and kill off ground plants. Depth should not be more than 2 – 3 inches.

Comment A3-45

SPR BIO-15: Grazing Plans

- What is an AMU and RDM? The acronyms are not spelled out in the document or the concepts discussed.
- Where is the "desired post-grazing conditions" identified? It would be good to know that goat grazing is supposed to accomplish. Observations of goat grazing in Lower Bidwell Park over two consecutive years showed very little or no effect of grazing in removing understory fuels. Goats grazed on dried grasses in the fall that constitute a fuel load from May until the rains return in October or November. By the second or third rain event the grass is growing and is no longer a

Comment A3-46

fire threat. The goats grazed in October at the end of the fire season, which doesn't seem to be very useful tool in reducing fire hazards. The goats do a poor job of reducing blackberry thickets and ivy. Goats nip off the leaves leaving the blackberry canes and the ivy vines (up to about four feet) which leaf out the following spring. By the following summer one could not even tell goats had grazed the area, everything had grown back.

Desired post-grazing conditions (e.g., usually measured in RDM of between 300-800 lbs/ac for grasslands; measured in shrub story canopy closure or shrub height for upland mix).

- How are these metrics measured? Who is going to determine the pounds per acre? Where is the protocol for it in the SRP?
- Why does this SPR address "mother-offspring groups" and "stockers" and the ability to sell them?
- Why is this SPR address getting rid of dead animals?
- Does the RCD expect that the City would maintain their own livestock for grazing purposes? If not, don't put this stuff in here.
- What is the minimal distance in feet to the closest riparian corridor/stream allowed? It isn't enough to say that a grazing plan includes this information but should include the distance allowed to be clear.

Comment A3-46, continued

Page 61

a) Would the project have a substantial adverse effect……

- This checklist seems completely out of place. Nothing to introduce it.
- The DEIR discusses fifteen different SRPs all of which need to be evaluated for impacts individually. Is this supposed to cover them all?
- What is the "project"?
- It says that impacts will be "Less than significant with Mitigation Incorporated", yet the mitigation measure for this (MM-BIO-1) does not mitigate a project it provides compensation for losses due to the project. A mitigation measure should prevent the potential loss not compensate for it.

Comment A3-47

The program area is located within the Mud Creek, Big Chico Creek, and Butte Creek Watersheds.

- What about Little Chico Creek and Sycamore Creek watersheds?
- It is also part of the Sacramento River watershed.

Comment A3-48

Impacts to Wildlife Resources

Direct impacts: All proposed treatments could result in disturbance from human presence, habitat alteration, and noise.

- Could result? No, it will disturb wildlife, no "could" about it.

Direct disturbance, such as mortality to individual animals, is unlikely,*….*

- …. if the SRPs are followed.

Comment A3-49

While direct impacts to special-status wildlife are not expected, if they occurred, they would be a potentially significant impact.

- The checklist item states that impacts will be "Less than significant with Mitigation Incorporated" yet here you have concluded that direct impacts to special-status wildlife may be potentially significant, how can it be both?
- The mitigation measure that will cause the impacts to be LTS is an "ex post facto" mitigation and does not prevent the impact, which can be interpreted as a statement of overriding consideration to allow the impact and then try to make up for it through compensation.

Comment A3-49, continued

4.8 GREENHOUSE GAS EMISSIONS

4.8.2 Thresholds of Significance and Impacts

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ***Less than Significant Impact***

- There are a number of impacts to GHGs that were not discussed in this section.
    - Carbon stored in existing growing vegetation removes carbon from the atmosphere. Reduce the amount of vegetation and you reduce the amount of carbon uptake. This is an unfortunate impact of vegetation removal. A mitigation would be to plant an equal quantity of vegetation to offset the impact.
    - The plan calls for using prescribed burns throughout the entire City to manage vegetation. This process will release carbon dioxide and other constituents to the atmosphere increasing GHGs. Making statements like "if the vegetation is never managed it will still burn eventually" is totally untrue. Most of the vegetation under consideration for reduction activities will never burn even without vegetation management activities.
    - Besides prescribed burns the plan also calls for the removal of vegetation and according to this document, up to 90% of the vegetation in some cases. This will greatly reduce the carbon capture amount of green vegetation and needs to be mitigated by planting vegetation in other areas.
    - Utilizing livestock to manage vegetation will also increase GHGs by producing methane, N2O, and CO2. Ruminants are known as one of the highest generators of methane and are targeted for reduction to reduce GHGs worldwide. Ruminates include all of the proposed grazers (goats, sheep, and cattle) under review by this DEIR, yet they were not discussed.
    - Allowing woody plants to gradually decompose slows down the carbon cycle and allows organisms that utilize the carbon and nitrogen components of plants into their bodies further trapping GHSs and providing nutrients to the habitats. It is called a natural cycle and predates cultural practices by millions of years.
- Mitigation Needed – in order to offset GHGs produced by the VFMP a number of mitigation will need to be developed from planting trees, to encouraging more decomposition of woody vegetation material to other creative ways to off GHGs like providing staff with electric vehicles.

Comment A3-50

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Existing Conditions

Natural hazards in the program area include wildfire, flooding, hazard trees (defined as snags or unstable trees that are likely to fall on trails or structures), poor footing on trails, and dangerous plants and animals such as rattlesnakes, ticks, mosquito-borne illnesses, and guardian oak (Toxicodendron diversilobum).

- *Toxicodendron diversilobum* is commonly known as "poison oak" not guardian oak. Why isn't the term "poison oak" used in this document?
- Ticks are not dangerous, they are annoying. Tick-borne illnesses are caused by the pathogens they carry and are dangerous.

Wildfire

- *human-caused illegal fire ignition*
- *illegally human-caused fires*

- Wildfire is wildfire whether caused by a lightning strike, a catalytic converter catching dried grass under a parked car, a cigarette butt, metal sparking in dried grass, a legal or an illegal human-caused fire. What is the purpose of talking about illegal human-caused fires in this document and not other common fire ignition methods?

***Natural biological hazards in the park**: The proposed program will not increase the population of rattlesnakes, ticks, or Toxicodendron, but if off-trail travel is more attractive after program implementation, more parkland users could encounter these existing hazards.*

- Poison oak (*Toxicodendron diversilobum*) is a fire-adapted plant that resprouts vigorously after fire events. Prescribed burning may increase poison oak growth.
- Opening areas up to more grassland characteristic by whatever vegetation management method will increase the number of ticks and diseases associated with ticks.
- Fires (wildfires and prescribed burns) can force animals like rattlesnakes and mountain lions out of the fire area into other areas and may increase the concentration of snakes where people recreate.

Comment A3-51

Page 103

Providing courtesy public notification 24 hours prior to and after each herbicide application is not required by any law or local ordinance, is not consistent with "Caution"-labelled herbicides' level of risk, and conveys a misleading impression about the level of risk. Additionally, the labor and coordination cost of putting up and taking down courtesy public notification signage can exceed the cost of the treatment itself, reducing the amount of management the City can undertake in any given year.

- While it is true that many pesticide applications do not require public notice, it was the "stated promise" by City Staff that the public will be noticed and treatment areas signed when using pesticides. This "promise" was in lieu of the Park Commission creating a policy with regards to this issue.
- California's Community Right-to-Know Act requires public entities to inform about the use of materials that may be hazardous. Staff provided an annual list of chemicals used in the City's

Comment A3-52

parks until the current management team took over and eliminated a number of processes and procedures they did not agree with.

- Applicators are required to be up to date on the Safety Data Sheets (SDS) for every material they work with, the public should also be informed. In many poisoning cases it isn't the pesticide that causes the problem it is the additional material in the application.
- Cost should not be a factor with informing the public and should be included in the budgets for every project that requires the use of a pesticide.

Comment A3-52, continued

Page 127.

In some areas, particularly in the Upland Mix vegetation type and some greenways, program implementation will open sightlines. This will enable park visitors to better see each other and the surrounding landscape.....

At the same time, visitors for whom low visibility is currently a deterrent to outdoor recreation might increase their parkland visits. Birdwatching and wildflower viewing opportunities might increase, in areas of the parklands that are currently very dense. Many of the most used areas of the parklands, such as One Mile, the Horseshoe Lake area, the Golf Course and the Disc Golf course, are unlikely to undergo any visual change because their vegetative fuels loading is already within the desired range for their vegetation community. Access impacts are further discussed in the Recreation section (4.16) of this document.

- It is not nor should be the objective of this vegetative management plan to make it visually and psychologically comfortable for people visiting the park.

See response to comment A3-34

- The vegetative fuel load around One-Mile is within the desired range for the vegetation community? The area between Caper Acres and Hwy 99 has one of the densest, understories in the Park. It may not be in the One-Mile active recreation area but it is in need of reduce the fuel loading caused by the invasive plants and plants like poison oak that have taken over the area.

Comment A3-53

Page 146.

The pre-settlement (i.e., pre-1855) fire return interval across Chico parklands is difficult to determine, because (1) fire return interval calculations are usually based on tree scar data, which underestimate fire frequency since not every fire scars every tree, (2) fire return intervals in grasslands are almost impossible to determine with accuracy, and (3) the people who were instrumental in sustaining, and could have accurately reported, the pre-1855 fire return interval were forcibly prevented from managing their lands and transmitting their complete culture to their descendants.

- The FRI is difficult and almost impossible to determine yet the VFMP and DEIR state that it is 5 – 12 years. How accurate is that?
- What does statement #3 have to do with this DEIR? These kinds of statements, while they may be true, don't belong in an EIR.
- What is the natural FRI vs. the human-caused, post-settlement FRI?

Comment A3-54

Potential Wildfire Behavior Within Bidwell Park – Table ?

- This table indicates that Lower Park fire behavior is 73% "Torching Fire". What does that mean? Torching is a type of fire that starts at the base of a tree and spreads upward and is usually

Comment A3-55

associated with conifers due to their sap and hydrocarbon content. In an oak woodland, especially in Lower Park, torching might occur from dead ivy igniting and burning upward into the canopy. Fire ladders are present in some areas of Lower Park but in many areas freestanding oaks have a clear understory.

- The table is presented but not discussed in the DEIR. What is the cause of the "torching fire" in Lower Park? This information is used without discussion, why?

Comment A3-55, continued

Appendix A Project Consistency Checklist.

Introduction

- Does this first paragraph really need to be here? It has already been stated in the document and has no benefit being part of an introduction to this environmental checklist.

…use the Project Consistency Checklist below to determine whether or not the future activity is a later activity within the scope of the analysis in this DEIR…

- How is a future activity a "later activity"?
- The Project Consistency Checklist is a CEQA environmental checklist for an initial study so why not just call it that?

Comment A3-56

Appendix E. Some High Priority Invasive Species in Chico Parklands, With Best Practices for their Removal

High Priority Invasive Exotic Plants To Be Removed

It is not practical to remove every exotic plant from Chico parklands. Some plants are so naturalized that the costs of removing them do not justify the benefits. Invasive removal priorities change over time with changing ecosystems, land management objectives, and cultural values.

- It is not practical to ignore invasive exotic plants from Chico's parks. The City has ignored many invasives and exotics and the result is that it will take millions of dollars to restore Park habitat to a natural, reduced fire risk, environment.
- How does this statement work? *Some plants are so naturalized that the costs of removing them do not justify the benefits.*
- Invasive removal priorities change over time because new plants are always taking over. The City does not have an active EDRR program. By the time they are notices exotics and invasives have gained a foothold in the Park. Most of the priorities have been developed and promoted by third parties and not the Park Division or staff.
- There have been a number of successful invasive exotic removal campaigns in the Park.
    - Ailanthus was targeted a number of years ago and eradicated from Bidwell Park.
    - Privets were targeted and successfully eliminated even though they are used as sidewalk trees in downtown. Continued removal of starts should continue.
    - Bladder senna was controlled but is coming back because the City did not keep up with it after Friends of Bidwell Park removed most of it.
- Today Catalpa has replaced Ailanthus and Privet as one of the most invasive trees in the riparian corridor of Big Chico Creek. Failure of the City to control it in Bidwell Park, where it was introduced by the State's Forestry Station and Arboretum in the early 1990s, has caused it to spread all the way to the Sacramento River where it has taken over the riparian forest along Big

Comment A3-57

Chico Creek. When requested by the Park Commission in the 1990s to address the Catalpa problem, staff said they couldn't touch it because of the permits required and nothing was done. Now it is out of hand and should be a priority.

- The City needs to develop a EDRR (Early Detection Rapid Response) program for the Park and other areas. English ivy is one such invasive, naturalized plant that needs an EDRR program. It is easily treatable by hand removing when it is just starting but once it grows 40 – 60 feet up into a tree and covers acres of ground, it is near impossible to remove. One ground and area that was treated by FOBP took three years of repeated pulling to eliminate the patch of ivy. The City has ignored this weed for years and still is.
- If Appendix C is to be used as a guide it would help to have pictures of the plants listed in it to give implementers an idea of what the plant actually looks like.

Control Methods

- All of the control methods listed in Appendix C describe herbicide use and very little manual control. Manual control is effective in a lot of places for a lot of different plants. Herbicides should be used as a last resort PER IPM strategies.
- All saplings, up to three or four inched in diameter, can be easily removed by a week wrench, pick ax, shovel, or Pulaski. Larger ones can also be removed by hand depending on the species and soil condition.

Blackberry

Not to be confused with the 3-leaflet native species, Rubus discolor,...

- *Rubus discolor* is the Himalayan blackberry (per CalFlora), not the native California blackberry (*Rubus ursinus*) or Western Blackberry *(Rubus leucodermis)* which should be encouraged and protected from removal during vegetation removal projects.

Eradication Methods

- Goats are not effective at removing blackberry. They only eat the leaves and leave the canes. They can also cause an increase in plant density by causing additional canes to grown when nipping off young canes.
- Fire is also not a recommended method of management. Blackberry requires a high temperature fire which are not normally used in prescriptive fires.

Punctureveine

- FOBP has manually treated puncture vine will some success. It can be easily removed with a trowel inserted near the tap root and pulled. Should be done during the flowering stage.

Pokeweed (*Phytolacca americana*)

Efforts to eradicate pokeweed are not feasible, so benefits of control efforts must be specifically defined - such as preventing infestation that may impede reestablishment of natives where some activity leaves bare soil. Removal of blackberry Thickets is a good example of this.

Comment A3-57, continued

- Pokeweed or pokeberry can be removed by hand. It is an easy process if it is done at an early stage before the substantial root develops. They can be removed by using a shovel or pry bar to loosen the tap root before pulling with older plants. FOBP has removed significant patches of pokeberry over the years by hand pulling before seed set. Recent efforts by the Park's Volunteer Coordinator resulted in volunteers trying to remove pokeberries in the fall when they were full of berries, which probably resulted in greater seed dispersal and new starts next year.
- An active EDRR program is essential with this weed.

Comment A3-57, continued

The commenter asks the following questions, presented here in *italics,* with the City's response in plain text:

Response to Comment A3-1

The commenter identifies various typographic and stylistic issues in the document and acknowledges that thorough editing is not always possible when documents are produced in short amounts of time.

The commenter asks why the appendices are not listed in the Table of Contents.

In the digital PDF version posted on the BPPC web page, the PEIR and all its appendices are combined into a single compressed document. That document's table of contents does list the appendices. The City will ensure that all future digital and print versions of the PEIR contain a master table of contents that lists the appendices.

The heading "abbreviations" has been changed to "acronyms and special terms" and heading 1.1 has been updated to be consistent with the Table of Contents. It is unlikely every formatting issue has been resolved to the commenter's satisfaction, but the City appreciates the commenter's feedback.

Response to Comment A3-2

The commenter objects that the term "units" is used throughout the document without explanation (e.g. "restoration units," "thinning units".) "Units" means the discrete bounded areas in which a type of work is to be done.

A project can consist of a single unit or may consist of multiple units. If a project has multiple units, they may be spread out in space or time, and/or they may differ in prescription (such as when a south-facing hillslope is thinned to a different standard than the north-facing slope). This definition has been added to the table of acronyms and special terms.

Response to Comment A3-3

"Proposed vegetation management projects not specifically listed in the DEIR along with their detailed scopes of work should be reviewed and approved by the Commission prior to the implementation of the project."

The comment is noted. The Commission will continue to review and approve the general course of work in Chico parklands, provide direction to staff, and advise the Council on priorities related to the Parks. However, CEQA gives the City has considerable flexibility in how it reviews and approves subsequent activities after a PEIR is in place. To spare the Commission, which only meets monthly, from having to review every detailed work plan that is developed before managers can complete environmental review and field supervisors can implement the work, a simplified approval process could be developed pursuant to CEQA §15168(c). See **Master Response 4: Future Activity Workflow**.

Response to Comment A3-4

"Missing from the SPRs is a project requirement for developing a project-level scope of work prior to conducting a project that would spell out exactly what is going to be done and how it complies with the DEIR, VFMP, SPRs and Mitigation Measures and any other project level criteria (methods, protocols, expected outcomes etc.) required to be carried out in order to conduct a project properly by anyone, including city staff, volunteers, CCC crews, CDF c[r]*ews, city staff, contractors, etc."*

The commenter requests more information about how future activities under the PEIR would be translated into work getting done on the ground. See **Master Response 4: Future Activity Workflow**.

Response to Comment A3-5

The commenter states that the VFMP and PEIR do not have a single set of goals and objectives and says it mixes up the concepts of purpose, goal, and objective. He provides a helpful table comparing three lists of objectives, showing that while the three lists are not exactly identical, they are not inconsistent with each other.

The PEIR has been revised so that these three lists are identical (see Revisions to Text of Draft PEIR). The VFMP has also been revised accordingly without removing or adding significant information.

The commenter argues that the purpose of the VFMP should not be to "minimize risk of fire" because that implies that zero fire risk would be achievable.

The City agrees zero fire risk is not achievable; "minimize" is commonly understood to mean "reduce as much as feasible within constraints". The commenter states the City needs to identify achievable levels of risk. The comment is noted; formally establishing acceptable "levels of risk" was not a goal or objective of the VFMP. Instead, the City has chosen to establish acceptable ranges of vegetative fuel density that will both promote ecological health and reduce the risk of fire, compared to doing nothing. To emphasize some of the other values that must be protected while reducing fire risk (including ecological health), the sentence has been slightly reworded.

Response to Comment A3-6

"Who will make the determination as to what level of removal of flammable vegetation is appropriate?"

The VFMP standards will be translated into detailed thinning prescriptions by a field supervisor, Director or delegate, qualified consultant, and/or RPF. See **Master Response 4: Future Activity Workflow**.

Response to Comment A3-7

"What areas would see vegetation reduced 90% similar to a wildfire? And why would vegetation need to be reduced that much?"

Woodlands require some openings (as well as denser areas) to be healthy, a concept often described as a "mosaic" and emphasized in the VFMP. Therefore, if there are large areas of dense vegetation without any openings, especially if the vegetation is even-aged, the City would remove vegetation in patches, to create openings (assuming a project/activity was funded and approved for that area). Within those patches, vegetation would be reduced about 90%. To create a mosaic, surrounding vegetation would be thinned less or simply left alone.

Disturbance is a hallmark and a driver of ecosystem health. Disturbance means anything that removes or rearranges a community (e.g. a fire, a herd of elk, a landslide, or a hurricane). When disturbances are both high-intensity and large in extent, we call them catastrophic. When disturbances are high-intensity yet small in geographic extent, they are usually considered healthy in Californian woodlands – indeed, they are key to sustaining biodiversity. Fire managers and foresters know that even good fires have "hot spots" that leave small areas of high mortality, which are used by numerous species that need them. Since an objective of the VFMP is to reverse or mitigate the adverse effects of fire suppression, it makes sense that, in areas that have not burned in a while, the City would try to reduce vegetation similar to how a (non-catastrophic) wildfire would reduce it. That means creating some openings while other areas are relatively untouched.

Response to Comment A3-8

The commenter states there are few black oaks in the park and asks where the "legacy black oaks"

are.

While individual black oaks are occasionally found along Big Chico Creek much lower, stands of black oak woodland in Chico parklands are found on the South Rim of Big Chico Creek canyon, usually close to 1000' in elevation. Calflora (calflora.org) can provide locations of some stands documented by trained botanists. Black oaks (*Quercus kelloggii*) are not a rare plant by any means, but their relative rarity inside Chico parklands (combined with their importance to wildlife and human heritage) could make black oak woodland conservation a priority in the minds of many Chico park users.

There is no fixed definition for what makes a tree or stand a "legacy" tree or stand. It is a term used to distinguish and honor trees of exceptional age, size, condition, or productivity, or trees or stands that play a significant role in the cultural or natural history of an area. Stands that are on the edge of their range or were once more numerous or healthy but now only survive in a diminished state could also be thought of as "legacy trees". Because black oaks are thought to have been more numerous in what is now Bidwell Park prior to climate change and fire exclusion, remnant black oak stands can be thought of as legacies of a past time.

Response to Comment A3-9

The commenter asks what other values relating to vegetation, besides that of reducing fire risk, the City will improve.

As discussed in VFMP chapter 2, different parklands and greenways have many different values (such as recreation, biodiversity, flood conveyance, etc.) they must uphold. The City felt it was important to state up front that it can and will take other values besides just fire risk into account when vegetation management decisions are made.

Response to Comment A3-10

The commenter quotes the PEIR:

> *If a detailed analysis using the Project Consistency Checklist can document that their impacts are within the scope of the information in the program EIR, additional environmental documentation will not be necessary. If new effects are identified that were not addressed in the program EIR, the Project Consistency Checklist would then serve as an Initial Study to determine the appropriate environmental documentation the City would need to prepare.*

The commenter then states: *"The first statement is not true. If there are impacts not identified and addressed by the PEIR then additional environmental documentation will be required and it is stated as such in the next sentence. So why have contradicting statements?"*

The statements are consistent. If analysis determines that all a project's impacts are the same ones already identified and analyzed in the PEIR, then no new environmental document is needed (CEQA Guidelines (§15168(c)(1) and (2)). If analysis determines that some of a project's impacts are *not* already identified and analyzed in the PEIR, then a new environmental document is needed (i.e., a negative declaration, mitigated negative declaration, or EIR). The Project Consistency Checklist would help the City determine which of those three it needed to prepare.

Response to Comment A3-11

"Have the private landowners affected by this PEIR been noticed about this document and plan?"

Some work contemplated under the VFMP (particularly Arundo removal on some stretches of creek) would not be very effective without collaboration from adjacent private landowners. Even though no specific private landowners have been approached about collaborating with the City yet, the

Parks Division chose to mention the importance of private landowners in the VFMP PEIR, and to analyze the program-level impacts of a program that did successfully collaborate with private landowners. (For example, the analysis of the results of removing Arundo along a shared public-private stretch of creek assumed that all Arundo would be removed; it did not assume that Arundo would be left intact on private parcels.) The reason for this was to make it easier for willing landowners to voluntarily join in a City-led Arundo eradication project in the future, to allow private landowners to benefit from the streamlined environmental review process of the PEIR applying to their lands (if they chose), and to make sure private landowners could join in the Arundo removal activity without causing that activity to fall outside of the scope of the PEIR. It is common for a programmatic weed removal document to analyze the program's effects without first contacting every landowner who might eventually participate in the program (see e.g. YCRCD 2019).

No work could ever take place on private lands without the landowner's voluntary participation and signing a letter of understanding with the City. Because the Little Chico Creek Arundo removal project has not yet been begun and surveys have not yet begun either, landowner participation has not been sought yet.

Response to Comment A3-12

The commenter asks several questions related to the common theme of SPRs and mitigation measures, which are addressed here one by one.

[A] *"Based on the scope of the VFMP and the sensitive habitats within the area there are only three (3) mitigation measures? In a standard EIR the SRPs would be mitigation measures."*

Mitigation measures may be more familiar to readers of project EIRs, but SPRs are a common feature of the generation of programmatic EIRs developed over the last five to ten years. This includes CAL FIRE's Cal VTPEIR or the Tahoe Program Timber EIR. In these documents, SPRs replace the concept of "best practices." The whole program, with SPRs incorporated, is subjected to environmental analysis. Remaining impacts, if any, are addressed through mitigation. However, mitigation measures and SPRs both become binding elements of each activity's Mitigation, Monitoring and Reporting Plan, or MMRP.

[B]The commenter asks, "*Why were the SRPs not included in the VFMP, but included as the basis of evaluation in the DEIR?*" *Later, the commenter also asks for an explanation of the differences and similarities between best practices and SPRs.*

The VFMP was written first to identify the key projects and desired vegetation conditions on Chico parklands. That included some best practices for achieving those vegetation conditions. Once the VFMP was sufficiently complete to allow environmental review, the PEIR was developed. The SPRs in Appendix C in the PEIR were developed from:

- the best practices in the VFMP;
- comments received from the public and agencies during scoping;
- SPRs in other PEIRs that could be usefully adapted to Chico parklands;
- Ideas generated during PEIR development by City staff, consultants, and VFMP team members.

The SPRs and the best practices are not contradictory; they mutually reinforce each other.

The commenter further asks, *"For future projects (not later activities) not identified in the DEIR, will the City develop a project with the best practices from the VFMP and apply the SPRs which are considered exempt from environmental review once passed in the DEIR?"*

SPRs are not "exempt from environmental review". They form the basis of environmental review for all future activities under the scope of the PEIR.

The City will develop future activities with the best practices from the VFMP and apply the SPRs, then subject the activity to site-specific environmental review using the Project Consistency Checklist. If the activity with SPRs incorporated is determined to have no additional impacts beyond what is described in the PEIR, then the activity is within the scope of the PEIR and can proceed with no additional environmental document. If the activity is found to have impacts not discussed in the PEIR, then it would require an additional environmental document.

[C] The commenter states, *"If the SRPs take the place of mitigations, then there needs to be an SRP Monitoring Plan provide*[d]."

Yes, SPRs are integrated into the FEIR's mitigation, monitoring and reporting plan (MMRP). See chapter 4 of this document. The MMPR is then customized and attached to the site-specific work plans for each future activity.

"Therefore, by including SPRs in the proposed projects, mitigation measures will have to be developed on a project-by-project basis through an MND?"

No, not through an MND for most future activities. Future activities, if they are determined to be within the scope of the PEIR based on review using the project consistency checklist, will not need an MND. They will just get a determination and a work plan/MMRP. The MMRP will contain the relevant SPRs and/or mitigation measures (as applicable) from the PEIR. If a future activity is not within the scope of the PEIR then it would need an additional environmental document, which could be an MND.

[D] *"Why are the SRPs in the DEIR twice, in Section 4 and Appendix C? But not in the VFMP?"*

The SPRs are collected in Appendix C simply because it was thought convenient for the reader to have them collected all in one place. For why they are not in the VFMP, see response to A3-12-[B] above.

[E]*"Mitigation Measure BIO-1a is the same as Mitigation Measure BIO-1b; except BIO-1a addresses wildlife and BIO-1b plants. Why is it necessary to create two mitigation measures that address the same thing?"*

The two mitigation measures are indeed very similar because the same regulatory framework tends to apply to wildlife and plants. However, animals and plants are sensitive to impacts in importantly different ways. Plants are not sensitive to sound and are not frightened away from their nesting sites; animals do not have a dormant phase during which their bodies can be completely incinerated with no harm to next year's offspring. The mitigation measure was split in hopes of making it easier for wildlife biologists and botanists to understand and implement the VFMP PEIR.

"One mitigation not addressed is the "no project" mitigation measure. If impacts from proposed project activities cannot be mitigated to a "less than significant" level based on environmental analysis of future projects, then "no project" will mitigate it."

Correct: Avoidance is one category of mitigation. If environmental analysis concludes that impacts could not otherwise be mitigated to a less than significant level, the City would either need to write an EIR for that project and sign a Statement of Overriding Consideration before proceeding with it, or (much more likely) simply abandon that vegetation management project, which would result in "no project". It goes without saying that the City always has the discretion to abandon a given vegetation management project; that is what makes them discretionary actions and thus subject to CEQA.

"Mitigation Measure SOIL-1 (MM-SOIL-1), on pages 88 and 115, does not appear to exist in the document or in Table 1."

This mitigation measure, which addresses soil as well as hydrological resource issues, had been moved to become MM-HYDRO-1. Due to consultant error, the reference was not updated. The correction has been made in the document. The City regrets the error.

Response to Comment A3-13

The comment is noted. Adopting the commenter's language in part, Impact HYDRO-j is revised to read, "Arundo eradication activities that remove a significant amount of vegetation may result in an adverse impact to water quality by potentially destabilizing the bank or creek-bed." The commenter notes that MM-HYDRO-1 had already been incorporated into the project description of the Arundo removal project in the VFMP and thus does not really need to be a mitigation measure. He is right; the duplication is due to consultant error. However, there does not appear to be any harm in letting MM-HYDRO-1 stand as a mitigation measure.

Response to Comment A3-14

"It does not look like any impacts were analyzed for the specific projects outline in the VFMP, so how can you state that 'the City finds no significant impacts after mitigation'?"

As is appropriate for a programmatic EIR, impacts were analyzed as a programmatic level, not a project level. For example, impacts to wildlife were analyzed for how they could occur over the life of the program and how they could potentially be mitigated if they were found to be potentially significant. Future activities under the PEIR will still be analyzed for site-specific impacts. This future environmental analysis will tier off the PEIR, saving future managers the time and expense of starting from scratch with every site-specific analysis.

"Supposed the two mitigation measures will be used when 'irreversible and unavoidable' impacts are caused by a project. Compensation mitigations are used when 'irreversible and unavoidable' impacts are caused by a project. Purchasing land in another location to offset any 'irreversible and unavoidable' impacts does not result in no 'irreversible and unavoidable' impacts at the project site."

Correct, but it does result in no irreversible and unavoidable impacts **to the species of concern.** That determination is not the City's call to make, however. It can only be made by the trustee agency or agencies with the statutory authority to protect species of concern and prevent them from becoming listed or extinct. (In California, these agencies would be CDFW and/or USFWS, depending on the species in question.)

Response to Comment A3-15

The commenter asks whether the program's objective is to "reduce the likelihood of unwanted ignitions" or to reduce the likelihood of catastrophic fires.

In addition to "reduce the likelihood of unwanted ignitions," the same section also states the following objectives: "Reduce the negative effects of parkland fires on structures, lives and natural resources" and "Create conditions under which fire, when it does occur, can have beneficial ecological effects". The two latter objectives can only be accomplished by managing vegetation to promote fire behavior that is not catastrophic.

The commenter points out that fire suppression is itself a cause of modern, uncharacteristically intense wildfires, and asks whether the best practice might not be to allow a fire to burn once it ignites.

Yes, depending on location, weather conditions, and weather forecast, it can be better to let some wildland fires burn while monitoring them, rather than extinguishing them as soon as possible. This strategy is known as "wildland fire use" or "suppression modification."

The City does not control which fires are put out and how soon. The Chico Fire Department and the Butte County Fire Department/CAL FIRE are responsible for putting out fires, . While neither department has a modified suppression policy for Chico parklands, the Chico Fire Department is beginning the process of developing a CWPP (Community Wildfire Protection Plan) which could incorporate a modified suppression element for Upper Bidwell Park. The City is utilizing the VFMP grant to develop loose modified suppression concepts (based on local topography and fire experience and found in the Area Burn Plan document) from which the Chico Fire Department could draw or tier as it develops its CWPP.

Response to Comment A3-16

The commenter asks a number of questions related to the following Program objective:

> *Post-fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine, and Valley Oak), create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity.*

The commenter asks, *"What does 'post-fire' mean? Post which fire?"*

In many cases, after a fire very little or nothing needs to be done. But after any fire that burned hot enough over a large enough extent to kill a significant number of stems in a large patch and/or to stimulate significant resprouting that could result in continuous horizontal fuels, some follow-up treatments to promote ecological health. The commenter is concerned that the City would cut off all but one stem of naturally multi-trunked species and create a "Central Park" style area that would be inconsistent with natural values. This is not what the City intends to do, nor would it be remotely possible for the City to achieve, given the resources available. However, after particularly hot burns that top-kill trees across a relatively large area, land managers do have a choice to do nothing or take management actions that support a fine-grained vegetation mosaic instead of a homogeneous, even-aged brushland vegetation type.

Choosing to leave lands alone post-fire will not necessarily result in a "natural state" because twentieth-century human interventions have already removed Upper Park from its "natural state" as Annie Bidwell and early Chicoans would have beheld it. Fire suppression, the withdrawal of traditional gathering and cultural fire techniques that maintained open areas, the removal of most large fauna, and anthropogenic climate change have already altered the Park's plant communities and vegetation structure. These changes create a trend toward larger and more homogeneous fires that result in larger homogenous patches of vegetation, rather than the spatial and biological heterogeneity that is promoted by a pre-settlement fire regime in the Cascade foothills.

As the VFMP describes (pp. 39-44), post-fire management should focus on recruiting oaks (of all species); retaining shrubs that are relatively locally uncommon; removing invasive species and (if desirable) sowing native seed gathered from within the Park or very nearby; and removing enough resprouts from certain hardwood species (especially bay laurel and some oaks) to promote a tree form

instead of a shrub field. While some denser patches of shrubs or scrub are an important part of a habitat mosaic, continuous even-aged shrub fields are not very good habitat for most animal or plant species. Removing some stems of some resprouting hardwoods (even if they are not strictly a "ladder fuel" because there is no taller tree they can form a ladder to) can create beneficial openings that increase biodiversity, improve habitat conditions for deer and most nesting bird species, and lower future fire intensity and rate of spread.

Response to Comment A3-17

The commenter points out that several fires have burned in Bidwell Park over the last 20-30 years. Haven't they reduced fuel loads?

They have, and some areas that have burned recently look healthy. However, most wooded lands in Bidwell Park are considerably fire-interval-departed (i.e., they are not burning as often as their historical fire return intervals). Some areas of Upper Park have not burned in over 100 years. For more on the fire interval-departed condition of Bidwell Park, see response to comment A3-54.

The commenter points out that the risk of catastrophic fire in Lower Bidwell Park is not as extreme as in Concow/Paradise, and Lower Park has been described by the Fire Chief as "not that risky" compared to other areas.

Correct; Lower Park is less risky than many other areas, but still more risky than the City of Chico, many parkside residents, and CAL FIRE (who funded this work) would prefer to see. The LiDAR work on which the fire risk analysis is based was modelled using fuel moistures of 3% for one-hour fuels (such as grass), 4% for ten-hour fuels (stems under 1" thick) and 5% for 100-hour fuels (stems under 4" thick). These values were recommended by a CAL FIRE modelling expert as representing conditions of high fire hazard. While these conditions only exist a few days a year, the City's responsibility is not to study a best-case or average-day fire ignition, but rather to understand and avoid the worst possible outcome that is still plausible. Based on the modelling results, the City learned a serious fire in Lower Park is a low-probability, but potentially high-consequence, event.

The LiDAR fire risk map, and the conditions it is based on, should be considered in the context of climate change. For central Butte County, the number of days per year with a 95th-percentile fire weather index (i.e., extreme red flag conditions) has more than doubled since the early 1980s, and is modelled to continue to increase until at least century's end under both worst-case (RCP 8.5) and Paris-accord (RCP 4.5) scenarios (Goss et al 2020).

The commenter states that Lower Park's fire hazard is relatively low because fires frequently start in Lower Park but have always been put out so far. The comment is noted.

Response to Comment A3-18

The commenter asks whether it is the City's responsibility to protect homes in the urban-wildland interface through vegetation management or the developer's responsibility to protect homes by providing adequate setbacks and fire response provisions.

Of course, both public lands managers and private landowners share a responsibility to reduce fire hazard and fire risk. Neither responsibility is absolute and the resources available to expend on fire safety are not infinite. Furthermore, recent revisions to the CEQA statute and California building codes place more responsibility than ever before on developers to build projects that do not expose people and structures to wildfires. However, to the extent the City engages in any vegetation management at all, most citizens would say management should be targeted to reduce fire risk to adjacent structures. The Bidwell Park Master Management Plan affirms this:

> O.P. 6 Employ proper horticultural practices to preserve and maintain oaks, other native

vegetation, and other ecosystem functions within developed areas, **wildlands (only where necessary due to fire threat, etc.)**, and along trails [emphasis added].
NRMP- 5.2: Fire Management Objectives: Reduce the probability of wildfire within the Park that threatens Park visitors, Park facilities, and surrounding landowners and residents.

The commenter makes a number of suggestions regarding building code and land use code upgrades that would improve fire safety in Chico and the surrounding wildland-urban interface/ intermix.

These code changes are not within the scope of a vegetation management plan, nor are they within the jurisdiction of the Parks Division. However, they are within the scope of the Chico General Plan Revision and, in some instances, of the Community Wildfire Protection Plan currently being developed by the Chico Fire Department. The Total Area Burn Plan developed by Deer Creek Resources for the City includes many of these nonbinding recommendations, based on the wildland fire risk analysis DCR conducted in 2020. The Planning Commission and/or Chico Fire Department can consider acting on these recommendations.

Response to Comment A3-19

The commenter asks for references for the statement that suppression of cultural fires is "a primary cause" of the twenty-first century wildfire crisis, and points out other causes, such as climate change and the suppression of lightning-ignited fires as well.

The City agrees the crisis has several causes and has revised the wording from "a primary cause" to "among the causes". If he is interested in better understanding the connection between suppression of cultural fire and the current Californian wildfire crisis, Mr. Barrett can examine the following sources.

Anderson, M. Kat. 2005. Tending the Wild: Native American Knowledge and the Management of California's Natural Resources. Berkeley, CA: University of California Press.

Hankins, Don. 2021. "Reading the landscape for fire." *Bay Nature,* winter, 2021. Available online at https://baynature.org/article/reading-the-landscape-for-fire/

Kimmerer, R, and Frank Lake. 2001. "The role of indigenous burning in land management." *Journal of Forestry*, Volume 99, Issue 11, November 2001, Pages 36–41, https://doi.org/10.1093/jof/99.11.36

Lake, F., and Jonathan Long. 2014. "Fire and tribal cultural resources." Gen. Tech. Rep. PSW-GTR-247. Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station: 173-186.

Response to Comment A3-20

The commenter addresses a number of statements about Lindo Channel. First, the commenter states, *"Lindo Channel provides flood control function now, but it was the primary creek flow until the diversion of Little Chico Creek through town. Lindo Channel was given to the State of California for a state park by Annie Bidwell, so there was a park purpose to the land originally."*

Whether Lindo Channel was always or usually the primary creek flow through what is now Chico is a matter of some historical controversy (GEM 2001 p. 1-2). Annie Bidwell may have tried to make a park out of part of Lindo Channel, but the State of California did not choose to use it for that purpose, instead conveying it to Butte County who later deeded it to the City. The flood control diversion structures near Five-Mile were built by the U.S. Army Corps of Engineers in 1961 and are maintained by the California Department of Water Resources (DWR) in partnership with the County of Butte and the City. DWR manages the channel for flood conveyance (under a master maintenance permit from California Department of Fish and Wildlife).

The commenter asks what recreation and safe non-motorized transportation opportunities Lindo Channel provides.

There is a short section of formal, paved bike trail in the Channel which provides a safe undercrossing to Highway 99 and is depicted as Class 1 bike trail on the Chico Bike Map (BCAG 2014), and several informal trails are used by non-motorized travelers between the Madrone Bridge area in the east to the Manzanita Court/Mangrove Avenue shopping areas in the west. The creekbed itself, when dry, is also an informal travel route. Although the City does not spend money maintaining them, these routes are nonetheless important recreational and travel resources for some Chicoans.

The commenter states the City of Chico has owned Lindo Channel since the mid 1990's but has yet to develop a plan for its use and functions.

This is true. Nonetheless, DWR and the City currently manage the Channel to meet flood conveyance and greenway values.

Response to Comment A3-21

The commenter writes, *"There should be no reason to remove native plant species in riparian areas. Native plant species should be encouraged not removed. The risk of a catastrophic fire in a riparian zone, while ever present, is not as great as the fire risk in drier and higher plant communities. Grape vines cover a lot of the riparian areas and are considered by the Plan to be 'ladder fuel'; however, it is really hard to burn riparian vegetation with high water content and therefore isn't a great a threat."*

The VFMP does not state that fire danger is just as high in riparian areas as it is in drier plant communities. The VFMP only states that riparian areas can benefit from thinning under some circumstances. Riparian areas rarely burn intensely, but they did burn historically, so riparian plants are still fire-adapted. As well, large fauna such as elk and deer herds would have browsed the riparian areas historically, keeping vegetation in check. Today these species have largely been removed from the system. Adding to that, temperatures are rising, and water tables are dropping, which means that less vegetation can thrive in a single square foot. Therefore, it is prudent for a plan adopted in 2021 to at least allow for the possibility of needing to reduce some native vegetation density to improve overall riparian community resilience.

Due to the overwhelming amount of Himalayan blackberry in most riparian corridors, however, it rare that native vegetation gets the chance to become overgrown enough to need reduction, because native plants are constantly out-competed by invasive species, with the exception of California Grape. While live grapevines do have a high-water content, dead ones do not. California grape is very good at climbing other native species (coffeeberry, redbud, dogwoods, etc.) and then killing them because they take over so fully that the species, they are climbing can no longer receive sunlight to photosynthesize. They do the same thing to older vines, thus creating a stack of dead tree/shrub, dead grapevines, and then live grape vines on top. Even in the more humid riparian corridor, that stack still poses a significant threat if it were to ignite. Grapevines also have the capability to hold dead limbs suspended even after they have detached from the tree, causing a safety hazard in a public park (see image).

Big Chico Creek specifically is home to the foothill yellow legged frog and the western pond turtle, both considered by California Department of Fish and Wildlife to be species of special concern and both under consideration for being listed under the Endangered Species Act. These species require sunlight to live. Turtles need sunlight for basking. Frogs require sunlight for occasional basking and algal growth for tadpoles to feed on. Reserving the potential to remove some native non-listed vegetation to enhance sensitive species' habitat is a worthwhile measure.

Response to Comment A3-22

The commenter quotes the following section of the PEIR:

> *Page 22 Map – Managing Valley Oak*
> *Select healthiest trees, thin to average 70 trees/ac. Chip cut/downed woody material <4"; >4" can be chipped or left (10' from nearest trunk) based on site conditions. Remove invasives first before removing any natives as a last resort. Grazing, with grazing plans and enough creek setback. Consider protecting young oaks from herbivores. Promote native biodiversity/productivity.*

The commenter then asks the following questions, presented here in italics (City response in plain type):

"Who is to determine what are healthiest trees? Is that an appropriate criterium?"

In parts of Chico parklands, the combination of fire suppression and drought exacerbated by climate change have led to unhealthy stand densities in which individual trees are in constant competition for sunlight aboveground, and for nutrients and water underground. This constant competition can lead to a myriad of forest health issues like insect infestations, disease outbreaks, and higher mortality. However, some individual trees seem less susceptible to these issues than others. Yes, selecting for the healthiest trees is likely prudent to create the best chance of passing on a climate-resilient stand to

future generations. The healthiest trees will be identified the same way the trees to be removed (if any) will be marked: by a qualified specialist, arborist, botanist, Registered Professional Forester, or City staff member with adequate training. Of course, dead and senescent trees are also extremely important habitat and the VFMP also sets a standard of retaining 2-4 snags/acre (on average) across City parklands.

"Will the trees to be "selected" to remain in an area to be thinned native trees or any trees? The VFMP states that non-native woody species should be removed "where they compete with Valley oaks for light or are touching canopies". This map states that invasives should be removed first and is not consistent with the VFMP. Shouldn't all non-native woody species be removed, period, before thinning out native trees?"

The map and the VFMP are consistent. All non-native trees in a thinning unit would be removed before removing any native trees in that unit. The VFMP states this on pp. 14, 32, 34, 35, 40, and 41.

"Where does the 70 trees per acre come from? Why was this density selected? […] Does the 70 trees per acre apply to the entire park or just areas where there are too many trees such as the Petersen walnut orchard?"

This just pertains to the Peterson Walnut Orchard as a first step in trying to restore that area to a more natural landscape. 70 TPA is a good first step to restore healthy forest structure without leaving trees susceptible to wind throw. This density would generally leave Valley Oak trees spaced out 25 feet by 25 feet. That is an average and there is no expectation or desire that trees will be exactly 25 feet by 25 feet apart. Healthy habitats require a heterogenous, "mosaic" structure with clumps, individuals, and openings. Given the existing stand structure, and the desire to grow healthy trees and leave room for them to extend their large canopies for future growth, 70 TPA was selected. There could be other ways to express this desired density (e.g., as a range instead or in terms of basal area). Basal area standards tend to allow for more space for large trees and less space for small trees.

Valley Oaks and other oak woodland communities are not fully integrated into the California Forest practice rules, so foresters are left using their best judgement and their knowledge of local ecologies to estimate healthy density ranges.

"The VFMP also states that woody material <4" can be left on the ground as can material >4". Chipping should be kept to a minimum to prevent the killing off of annuals and grasses. Why is dried, chipped woody material not considered to be a fuel (per Jim Dempsey), but leaves, branches, and small woody debris on the ground is? The document recommends raking this material away from bases of trees before prescribed burns because it might ignite. If that woody debris will ignite why won't chipped material?"

Chipping woody material increases the surface area and moisture absorption of the woody material, allowing for faster decomposition (carbon cycling) rates, compared to woody material left intact. Chipping is simply aiding in nature's natural decomposition cycle. Spreading chips in place allows nutrients to cycle on the site, as opposed to exiting the cycle if they are hauled off in green waste bins. Chips will become soil faster than a branch will become soil.

Chipping can adversely affect annuals and some native grasses, but it can also aid in reducing invasive species. Native grasses are generally not thriving in areas where chipped depths could reach 4" in depth due to the amount of woody material present. Areas that might reach the 4" depth are generally areas with overgrown trees that shade out the understory. Many native bunch grasses require full sun and

thus will not be present in those areas. Native annuals that could be affected are largely fire adapted and have seed stores in the soil that can last years and come up when conditions are right for blooming.

Intact woody debris and chipped woody debris can both ignite. However, chipped material will decompose faster into soil than intact woody material, meaning chipped material will be flammable for fewer seasons and likely for fewer days each season (because chipped material more easily absorbs dew and nighttime humidity). To reduce fire hazard from woody debris, raking material (including chips) away from the base of oaks is a generally recommended practice before prescribed burning and is incorporated into most burn plans. This is because of the way oaks grow. They have gnarls and notches which make unique habitat features for critters, but also allow sparks to enter the trunk and then ignite.

"There are a number of plants that should be protected from grazing including elderberry, California blackberry (Rubus ursinus), Western Blackberry (R. leucodermis), coffee berry, and other native plants that should be encouraged to grown and now mowed down by goats [sic]*."*

Elderberry is a federally protected plant and thus has specific management guidance the City must follow. Wire caging around specific plants has proven to be an effective deterrent to grazers and can be used as needed to protect vulnerable individuals, at the direction of a Director, field supervisor, Coordinator, grazing specialist, forester, or agency. However, native shrubs are adapted to grazing and browsing and evolved with ruminants. Over-protecting plants like coffeeberry, toyon or deer brush can lead to the plants growing much taller and larger than is healthy for the plant community. Native ruminants are much less numerous in Butte County than in historical times (Wertz 2001). Introducing a grazer like goats can act as simulation of a natural process.

Response to Comment A3-23

The commenter notes that other regulations apply to removal of riparian vegetation. He is correct; all work in creeks (and often even well up on creek banks or benches) can only be done under a Lake and Streambed Alteration Agreement (LSAA, often called an LSA or a "1600" permit) from CDFW. For all projects within the scope of the VFMP PEIR, it is a standard project requirement that an LSAA first be negotiated with CDFW. To comply with CEQA, CDFW generally files a Notice of Determination (NOD) when it issues an LSA or other Agreement. The public can review the NOD. Work can commence as soon as the NOD is filed.

Response to Comment A3-24

The commenter asks, "*Why thin undergrowth <150* [feet] *from the road under gray pines? Why 150 feet? How far around the gray pine? Just underneath the gray pine or from the road to the gray pine?"*

These recommendations were developed by a registered professional forester and are designed to improve park evacuation route safety by reducing the likelihood of gray pines torching within 150' feet of a road. Although gray pines are relatively fire-resistant trees, once they do ignite, they burn more explosively than other native Northern Californian tree because of their unique pitch chemistry. Therefore, removing brush from around their base is prudent near roads. As the measure states, undergrowth that is beneath gray pines will be thinned if it is within 150' of a road.

"Always 'try' to retain blue oaks? Should say 'Always retain blue oaks'!
As important as blue oaks are, it would be imprudent of the City to take away crews' ability to remove a blue oak if it is a hazard tree or one of dozens of young blue oaks competing inside the dripline of a legacy blue oak and compromising its safety.

Response to Comment A3-25

The typographical error ("be be") has been corrected. The commenter is correct: No, funding a project does not make the funder the lead agency. However, although it isn't common, sometimes a funder is willing to serve as a lead agency if the grantee does not have capacity to manage the environmental review for a project and/or the resources in question are in some way under the jurisdiction of the funding agency. It's not anticipated that the City would start performing environmental review this way on a regular basis, but it was thought prudent to draft the VFMP PEIR in a way that at least allows for the possibility. To do so does not in any way compromise the City's rights or abilities. This kind of language is becoming increasingly common in programmatic environmental review documents, as lead agencies increasingly collaborate or rely on each other to expand their own environmental review capacity. See also the response to comment A2-9.

Response to Comment A3-26

The commenter asserts "*the draft VFMP was not completed in 2020 [because] the VFMP has not been finalized at this time. A final draft VFMP has not been released, yet the DEIR is being reviewed.*" A draft can be completed without being adopted. For example, a draft General Plan – no matter how complete -- remains technically a draft until the EIR on that General Plan is certified. Only when the EIR is certified can that General Plan's status change from "draft" to "final" and legally be adopted.

Although it is not a general or specific plan, the VFMP is a program of work and is a project under CEQA. A project under CEQA cannot be *approved* (adopted) by a public body until environmental review has been completed on it. Just as a housing development might have plans that are complete, but not approved, until its EIR is certified, so too the VFMP is considered complete. (But not adopted, until its PEIR is approved.) Certainly, until the moment the VFMP is adopted by the BPPC, revisions could be made, and if those revisions significantly changed the VFMP or its impacts, then the VFMP and its PEIR would need to be recirculated.

The commenter adds that a seventh project was added to the third draft VFMP "that has not been review by the public." The seventh project was added based on public and Commissioner response to the second draft. The public was able to review the seventh project for 45 days during the DPEIR review process, as Mr. Barrett has done.

Response to Comment A3-27

Please see **Master Response 3: The Key Projects.**

Response to Comment A3-28

The commenter quotes Section 1006.1 of the Chico City Code, which states,

> Section 1006.1. The Bidwell Park and Playground Commission - Powers and duties.
> The Bidwell Park and Playground Commission, except when suspended as provided in this Charter, shall have the following powers and duties:
> A. The power and duty to operate and maintain all of the parks and playgrounds owned by the city and to adopt such rules and regulations as may be necessary to govern and control the use of such parks and playgrounds.
> B. The power and duty to provide for the propagation, planting, removing, pruning and maintenance of all trees and shrubberies along the streets and sidewalks of the city and to adopt such rules and regulations as may be necessary to govern and control the planting, removal, pruning, and maintenance of such trees and shrubberies.

The commenter goes on to state that projects conducted under the VFMP and PEIR still require

Commission approval and should not be implemented until a thorough and documented project proposal, work plan, mitigation plan, and monitoring plan is in place for each project conducted under the VFMP. Yes, each future activity needs at least a description, detailed work plan, and monitoring plan. City code does not specify the Commission must publicly or otherwise review every work plan, mitigation plan, and/or monitoring plan. City Code only directs the Commission to "operate and maintain" the parks and playgrounds and "adopt such rules and regulations as may be necessary" to do so.

Of course, the City must always comply with CEQA. A programmatic PEIR provides the City with flexibility in how to comply with CEQA. For future activities within the scope of the PEIR, the Commission is not required by CEQA to review each work plan individually.

Response to Comment A3-29

Please see **Master Response 4: Future Activity Workflow.**

Response to Comment A3-30

The commenter advises that SPR BIO-5 is difficult to understand and asks whether a project implementer will be responsible for interpreting it. Some SPRs are fairly technical. No, project implementers should not be responsible for interpreting SPRs without guidance. This would be the responsibility of the Director or delegate, or of the Field Supervisor with the supervision of the Director or delegate. Please see **Master Response 4: Future Activity Workflow.**

Response to Comment A3-31

The commenter asks a number of questions based on page 31 of the PEIR.
"Staff will have to prepare an environmental assessment for every project not included as the 'key' projects in this document?" Yes, staff will need to prepare a project consistency checklist for each future activity implemented under the scope of the VFMP PEIR. That does include any future activity not included as a "key" project. Additionally, it does include all the "key" projects as their environmental review is not complete yet either. (See **Master Response 4**.)

"What rare cases [requiring mitigation] *did the City identify?"*

As described in the PEIR, the City identified two cases or types of cases that could require mitigation. The first rare case the City identified during environmental analysis is specific to Arundo removal and involves potential bank destabilization from wholesale Arundo removal. Generally, the City would remove very little streamside vegetation, if it removed any. However, in the case of Arundo, which forms very dense invasive thickets, the City would need to remove all streamside vegetation at once (because it is all Arundo). If this action were taken without mitigation, it could cause a potentially significant impact of eventual bank failure from eventual death and undermining of the Arundo root ball. Therefore, the City established MM-HYDRO-1 which should be used whenever Arundo stands are large enough that their removal could cause a potentially significant impact on bank stability.

The second rare case the City identified during environmental analysis is general, indeed hypothetical, and involves potentially significant impacts to listed species. While the City does not plan any specific vegetation management projects that are already known to pose a significant impact to a listed species of plant or wildlife, many listed species do occur on City-managed parklands and therefore a future potentially significant impact to listed species cannot be ruled out. A listed species could be discovered in a planned vegetation management unit during a pre-implementation survey next month, or a species not listed currently could become listed three years from now. Either way, the City

would like to be prepared, so it developed a mitigation framework it could apply if one of those situations arose *and* the City still wanted to proceed with the project.

These mitigation measures (HYDRO-1 and BIO-1a and 1b) are the "additional measures [that] were developed and are presented as mitigation measures".

To summarize, the City concluded, after environmental analysis, that it could think of some instances where potentially significant impacts could result *even after incorporation of SPRs*. It designed mitigation measures to be applied in those cases. If the mitigation measures were feasible (and received the concurrence of the relevant trustee agency, e.g. CDFW, USFWS), then those potentially significant impacts would be mitigated, and the vegetation management project could go forward without a subsequent EIR. (Obviously, a mitigation and monitoring plan would still need to be developed.) If the mitigation measure as described in the VFMP PEIR was not feasible, however, then the vegetation management project would either need to be abandoned or a new EIR developed.

Obviously, the scenarios described above are not the only possible significant impacts a vegetation management activity *could* have. Every activity still receives analysis using the project consistency checklist, and if it is found to have a potentially significant impact not described in the PEIR, then it is not within the scope of the PEIR and a whole new MND or EIR would be needed.

The commenter goes on to offer his understanding of how the process would work, reprinted here in italics with City responses in normal text.

How does this work?
1. A specific fuel reduction project is developed for a specific area (vegetation unit).
Correct.
2. The work plan for the project incorporates appropriate SRPs into the work plan.
Correct (SPRs).
3. An environmental evaluation of the work plan with the SRPs is conducted using the Project Consistency Checklist (aka Environmental Checklist).
Correct.
4. If the Checklist or the person conducting the environmental review identifies significant impacts, mitigation measures will be added to the work plan to render the impacts to less than significant.
Correct.
5. The project receives a mitigated negative declaration (MND), and the project can proceed with approval from the Park Commission.

Almost correct. If the mitigation measures added to the work plan were HYDRO-1, BIO-1a, and/or BIO-1b, then a new MND would actually not be required: only the determination from the project consistency checklist, and of course a mitigation/monitoring plan approved by the appropriate trustee agency (CDFW and/or USFWS). (Please see **Master Response 4: Future Activity Workflow.**) However, if the mitigation measures were anything other than the ones in the VFMP PEIR, then yes, an MND would be required.

Response to Comment A3-32

The commenter asks, *"How would one know if there were changes to the resource or sensitivity at the project site without conducting an environmental review?"*

Depending on resources known to be present in the area at one time from earlier surveys, a simple reconnaissance survey is often adequate to determine whether there were changes to the resource or

sensitivity at the project site. In some cases, a protocol-level survey is the better choice.

Response to Comment A3-33

The commenter states that parks managers are not responsible for aesthetic decisions; the BPPC is. "Managers" in the passage in question was used loosely to mean anyone contributing to the management of parklands (as the BPPC certainly does), not only individuals who have the word "manager" in their title or job description.

Yes, the BPPC sets an aesthetic tone for the parklands, which is why the BPPC has been closely reviewing and revising the VFMP at every stage of its development to ensure it reflects community aesthetic standards.

Response to Comment A3-34

Under the VFMP, sightlines would not be raised "for public safety". Vegetation would be removed when necessary to reduce fire risk, lower flame lengths, and achieve fuel loading standards for that vegetation community. Sightlines would be raised as a secondary consequence of that vegetation removal. CEQA requires lead agencies to analyze the aesthetic and other effects of actions. Therefore, the City is analyzing the aesthetic effects of the lifting and lengthening of sightlines that would result from VFMP implementation in some areas. That lifting sightlines makes some people feel safer is indisputable but is not the justification for the action.

The commenter states, "Lifting and lengthening sightlines is not the aesthetic of a 'natural' park."

Fire lifts and lengthens sightlines. Many parts of California, including the Sierra-Cascade foothills, featured longer sightlines when they were in their natural state than they do now.

The commenter states, "The Plan and this document call for the removal of all lower branches of all trees and shrubs."

No, the Plan does not call for the removal of all lower branches of all trees and shrubs. The Plan emphasizes a fine-grained mosaic that would include openings, some denser areas, and thinner areas. Thinning along creekways and other linear units would be done in a "checkerboard" pattern (**SPR BIO-9**) to leave denser viney refugia alternating with thinned units. This creates good habitat variation and simulates the results of patchy, self-limiting fires consistent with a natural fire regime. As the commenter states, wildlife does nest in shrubs and viney areas, so clearing a large homogeneous area at a time is inconsistent with wildlife values. However, most wildlife use edge habitat (the border between dense and open areas) more than they use the interior of patches. Thinning in patches and checkerboards usually improves biodiversity. Birds can nest in the tops of shrubs just as well as they can nest in lower branches. Higher nest sites may offer more protection from predators such as domestic cats.

The commenter states, "The natural, native shrubbery in the Park should not be manicured and raised. Spice bush, red bud, coyote bush, native blackberry, coffee berry, elderberry, bay, madrone, and other native shrubs are bushes with multiple branches arising from the root."

Yes, all these species are naturally multi-trunked as well as fire dependent. In the absence of fire, they can eventually become unhealthy as individuals and as communities. The VFMP does not call for manicuring native shrubbery, but some native shrubs could be removed or trimmed if they are under the dripline of other trees or are part of an unnaturally large and homogeneous vegetation patch.

The commenter states that "unless there is an active public relations campaign by the City," residents will complain about the aesthetics of areas blackened in prescribed fires. The comment is noted.

The commenter states that since vistas will be lengthened from some vantage points, the aesthetic impacts should be identified as significant. CEQA only identifies adverse aesthetic effects as significant; beneficial or aesthetically neutral effects are not considered significant under CEQA.

As the commenter points out and the PEIR acknowledges, aesthetic judgements are subjective. While some people could find longer vistas to be less aesthetic than denser vegetation, the City does not find that the VFMP would result in significant adverse aesthetic impacts.

The commenter notes that adverse aesthetic impacts result when trees are cut leaving stumps behind, especially when the trees could have been removed with a weed wrench or Pulaski. He requests that future work plans include stump removal or grinding or (when possible) remove trees in ways that do not leave stumps. The comment is noted.

Response to Comment A3-35

The commenter observes that the Air Quality section states on page 44 of the PEIR,

> *the [Butte County Air Quality Management] District's two recommendations for mitigating impacts to below a level of significance were adopted into this EIR (see 4.3.4).*

The commenter asks where these two measures are to be found. The City apologizes for the poorly worded section, which has been revised for clarity.

The two measures requested by the BCAQMD which were incorporated into the PEIR as SPRs (not mitigation measures) are as follows:

- The BCAQMD acknowledges the need for a Smoke Management Plan (SMP) as noted in the VFMP. It can be assumed that the prescribed burning portion of the program would not conflict with established air quality attainment plans and would not result in a significant impact if prescribed burns are conducted in compliance with an approved SMP.
- All movable chippers of 50 HP or greater should be registered either with BCAQMD or through the statewide Portable Equipment Registration Program (PERP).

Response to Comment A3-36

The commenter makes several comments related to potential impacts from prescribed fire.

The commenter states that wildfire smoke from upper Bidwell Park would be less toxic than, and should not be compared to, smoke from the Camp Fire that burned structures.

It is true that smoke from burning only vegetation is less toxic than from burning vegetation and structures. All smoke is hazardous to breathe.

The commenter asserts that "prescribed burns would never offset wildfire burns." This is not supported by current literature.

Prescribed fires are now widely accepted in the air quality regulation community to both emit less smoke per acre than wildfires (NPFA 2020; Liu et al 2017) and to reduce the smoke impacts of wildfires that inevitably later re-burn the same areas (Schweitzer & Cisneros 2016, Ingalsbee 2015).

The commenter also states, "there is no way to quantify the reduction in wildfire smoke due to the implementation of the VFMP".

The precise number of acres to be burned over the lifespan of the VFMP is not knowable today because it will depend on funding availability and other factors. Therefore, the VFMP is being analyzed at a programmatic level. Given a hypothetical acreage figure, it is indeed possible to quantify

(model) the reduction in future wildfire smoke from prescribed burning activities; however, CEQA does not require a lead agency to do so for a programmatic EIR.

The commenter asserts that any smoke savings from VFMP activities would be lost as soon as wildfires run outside the park onto private lands that have not seen fuel reduction activities.

The park's largest up canyon neighbor is the Big Chico Creek Ecological Reserve (BCCER), where prescribed burns, mechanical treatments, and grazing have been systematically reducing fuels and restoring a natural range of vegetation density for decades. To the northeast, several large properties on Musty Buck Ridge are part of CAL FIRE's Cohasset VMP program to reduce fuels and restore a lower-intensity burn regime through mastication and prescribed burning activities. Of the large landowners in the watershed, the City of Chico arguably has the fewest acres of fuels reduction/restoration planned over the next several years. The VFMP process has been an effort to bring the City's pace and scale of vegetation management into line with regional standards.

The commenter writes, "The DEIR states that a Smoke Management Plan will be developed when prescribed burning will occur; however, it doesn't not [sic] *state what is required in s* [sic] *SMP or who is responsible for producing it. In one section is* [sic] *states that the City will get an SMP from BCAQMD and in other places it says that an SMP will have to be developed prior to a prescribed burn. Which is it?"*

An SMP is developed by an applicant (with BCAQMD's assistance) and then reviewed and approved by BCAQMD, prior to a prescribed burn. The commenter may be correct that an SMP is not technically a permit, but it is still a document that must be approved by a regulatory agency before the City may burn. Therefore, the section "needed regulatory permits" that refers to SMPs has been renamed "needed regulatory permits and approvals."

The City takes the respiratory health of its citizens and neighbors very seriously. Sooner or later, vegetation in most of California is likely to burn and produce smoke. By choosing the time and the manner of that burning, humans can have some control over the volume of smoke produced and who breathes it. Unlike wildfire, prescribed burns are deliberately conducted such that the exposure of humans to smoke is minimized.

In terms of their smoke impacts, prescribed fires differ from wildfires in several ways. First, prescribed burns are subject to a smoke management plan (SMP), which analyzes possible negative effects from the smoke, identifies sensitive receptors (homes, schools, businesses) that could be affected by the smoke, and identifies the weather conditions that would be likely to loft smoke away from these sensitive receptors. Second, the burn prescription (part of the burn plan) is written to specify burns can only be ignited in those acceptable weather conditions (i.e. increasing the likelihood that smoke will loft into the atmosphere and dissipate, rather than settling over town). Third, with sufficient burn unit preparation, prescribed burns can reduce future wildfire intensity and thus reduce the amount of smoke that is released when atmospheric conditions might be at their worst for smoke impacts.

The commenter states, "Most of the vegetation under consideration for reduction activities will never burn even without vegetation management activities."

The comment is noted. The City assumes that every acre of fire-adapted California will burn at some point. Even though it is not possible to predict with perfect accuracy which acres will burn soon and which will not, the City still has an obligation, within reasonable limits, to reduce wildfire risk and improve natural values (such as habitat) on lands it owns.

Response to Comment A3-37

The commenter asks: if the Butte HCP is not approved yet, why was it even mentioned in the VFMP

PEIR?

Only because CEQA requires EIRs to address the presence/status of any HCPs/RCPs in the vicinity of the project area.

The commenter further asks, if the Butte HCP were to be adopted, what would be the impact on the VFMP?

If the Butte HCP/RCP were to be adopted, land developers would be able to pay a fee in lieu of certain mitigation actions for some species, particularly Butte County Meadowfoam (BCM). This could mean an accelerated pace of residential or commercial development (but still in line with the General Plan). Certain areas currently within the scope of the VFMP (Bidwell Ranch; South Chico Conserved Parcels) might get a bigger dedicated budget for Butte County Meadowfoam (BCM) restoration, which could fund vegetation management projects that benefit BCM. Not all of these projects would have any particular impact on vegetative fuels, but some might be within the scope of the VFMP (e.g. prescribed burns, prescribed grazing). The overall impact on the VFMP would be minor.

Response to Comment A3-38

The commenter observes that not all biologists are qualified to perform biological surveys, even if they have a degree.

The City agrees (SPR BIO-2). A degree is not necessary to conduct a biological survey; "biological technicians" (who may or may not have a degree) are likely to spend the bulk of their time in the field and are generally highly qualified to perform surveys within their area of specialization, but not necessarily other areas (just like any professional). Furthermore, a botanist is not necessarily able to conduct wildlife surveys, and a raptor expert cannot necessarily conduct a botanical survey. An RPF (registered professional forester) *may* be qualified to perform one or both, but not necessarily. Furthermore, a reconnaissance-level survey to identify invasive weeds can often be conducted by someone who would not necessarily be qualified to conduct a protocol-level survey for rare plants. Certifications do exist in both wildlife biology and botany, but they have not been secured by enough professionals to be practical. (See also response to A2-11.)

To avoid this confusing language, the City has revised the passage to use the phrase "qualified specialist" throughout. A qualified specialist is someone whose experience and references indicate they possess the regionally appropriate knowledge of species and protocols needed to perform the particular survey for which they are being hired.

The pool of people qualified to provide ecological *training* to crews and contractors is necessarily larger than the pool of people available to provide *surveys*. This is because, by the time crews are being trained and directed to a work area, sensitive resources have already been flagged for avoidance.

Response to Comment A3-39

SPR-BIO-1 is simply a reconnaissance survey to determine the presence or absence of suitable habitat, not the presence or absence of particular species. If no suitable habitat is present for any sensitive species, or it's clear the habitat areas can be avoided, then there is no need to do further review or studies. If there is suitable habitat and it's not clear the habitat can clearly be avoided, then additional surveys would be needed (SPR-BIO-4).

Response to Comment A3-40

SPR-BIO-4 states:

> If SPR BIO-1 [i.e., a reconnaissance-level survey] determines that sensitive natural communities or sensitive habitats for plants, wildlife, or both may be present and adverse effects cannot be avoided, the project proponent will require a qualified RPF(s) or biological technician(s) to perform a protocol-level survey of the treatment area prior to the start of treatment activities.

The commenter replies: *"The SPR-BIO-1 item should trigger a protocol level survey, period, for every project. If impacts can be avoided or mitigated, then the project can proceed. If adverse effects cannot be avoided or mitigated, then the project should not be conducted at that location or area."*

The passage should have read "and adverse effects cannot clearly be avoided". The passage has been revised and now makes more sense. There may be some areas in Chico parklands where a reconnaissance-level survey can quickly disclose that no sensitive natural communities or sensitive plant or wildlife habitat are present. There are likely more areas where a reconnaissance-level survey could quickly disclose that sensitive biological resources are present, but can easily be avoided (i.e., all the elderberries are on one side of the unit, so re-draw the unit boundary to exclude them). A protocol-level survey is only needed when a reconnaissance-level survey indicates that sensitive biological resources are present and cannot clearly be avoided. A protocol-level survey can then help the City understand exactly where those sensitive biological resources are and whether they actually can be avoided or not.

Response to Comment A3-41

The commenter argues that the section on flagging and avoidance should be simpler. The comment is noted. The commenter points out when buffers cease to apply and activities can be resumed in the buffer zone, there should be no need to monitor the effectiveness of the no-disturbance buffer because it no longer exists.

The section has been revised.

Response to Comment A3-42

The commenter is asking how trainings will be conducted and documented and how adequacy of training is ensured.

Because trainings are an SPR, they would be tracked through a customized MMRP developed for each future activity. Please see **Master Response 4, "Future Activity Workflow."**

Response to Comment A3-43

The commenter asks several questions that came up for him regarding SPR-BIO-7, which deals with curbing the spread of noxious invasive plants.

The commenter asks whether any measures will be taken to prevent the spread of plant pathogens.

To prevent the spread of plant pathogens, the City only buys planting stock from certified nurseries that are regularly inspected by representatives of the California Department of Agriculture. These nurseries follow phytosanitary procedures that reduce the risk of spread of plant pathogens. The City does not have any nursery or propagation program of its own.

The commenter points out that goats can introduce noxious plant seed unless they are "flushed" (held off-site for an adequate amount of time, often 2 days) between grazing units.

The City agrees: As specified in SPR-BIO-15, a plan for flushing to prevent noxious weed seed dispersal must be built into any City grazing plan.

The commenter believes that goats are responsible for introducing thousands of turkey mullein plants in Lower Bidwell Park.

Turkey mullein (*Croton setiger*) is a native plant that is unpalatable to most livestock and is toxic to fish but has nutritious seeds that can form an important part of the diet of native doves. The relative abundance of turkey mullein (and many other native plants) can fluctuate after grazing or other disturbances.

T*he commenter notes that timing of removal is critical to noxious weed eradication*.

The City wholeheartedly agrees and has placed many recommendations for correct timing of removal into Appendix E.

Response to Comment A3-44

On the removal of native trees less than 8": See response to Comment A2-12.

Response to Comment A3-45

On chipped woody material: See response to Comment A3-22.

Response to Comment A3-46

The terms "AUM" and "RDM" were unintentionally left undefined. They have now been defined in the body of the PEIR and in the list of acronyms. "AUM" means animal-unit months and is, as the PEIR states, a way of measuring stocking rates. "RDM" means "residual dry matter" and is, as the PEIR states, an element of desired post-grazing condition. RDM would be measured by a field technician or any City staff member or volunteer tasked with monitoring the progress of the grazing activity. It can be measured by anyone with a few minutes of training and some simple equipment.

The commenter states that it would be good to know what grazing is supposed to accomplish, and that grazing does not often appear to generate lasting effects.

The City agrees it is important to set grazing objectives and designed SPR-BIO-15 to make that a part of every grazing activity. The appropriate grazing-related metrics (e.g. pounds per acre of stocking rate or RDM, stream buffers, etc.) would be determined by the field supervisor, Director or delegate, consultant, or other qualified specialist working on behalf of the City and would be incorporated into each site-specific grazing plan. It is not possible or useful in a programmatic EIR to try to specify appropriate stocking rates in advance for potential specific grazing units.

During the grazing activity, regular monitoring would need to be performed by the field supervisor or a qualified delegate. SPR-BIO-15 already says that a grazing plan must specify what is to be monitored and how and must further specify the timing and responsibility for monitoring For more on how SPRs get translated into work accomplished on the ground, see **Master Response 4**.

The commenter asks why grazing plans should specify details such as what age class of animals are acceptable and whose responsibility it is to dispose of dead animals. Is it expected the City would maintain its own livestock for grazing purposes?

No. The City is unlikely and not expected to maintain its own livestock. However, as any landlord or renter knows, things do go wrong and when they do, even minor details expected of the grazing contractor can become significant issues if a written contract does not plan for them.

Response to Comment A3-47

The commenter states that the Biological Resources impact checklist has nothing to introduce it.

The comment is noted. Each resource topic checklist is always presented following the SPRs for that resource topic; Biological Resources follows this same pattern, although it has a longer list of SPRs than most.

The commenter wonders whether each SPR is supposed to be analyzed for impacts individually.

No. The VFMP as a program of work, *with relevant SPRs incorporated*, is being analyzed for impacts. "The project" being analyzed in the PEIR is approval of the VFMP program of work (PEIR 1.3.4).

The commenter states, "*It says that impacts will be 'Less than significant with Mitigation Incorporated', yet the mitigation measure for this (MM-BIO-1) does not mitigate a project it provides compensation for losses due to the project. A mitigation measure should prevent the potential loss not compensate for it.*"

Preventing a loss is avoidance and is only one of the five possible categories of mitigation CEQA defines. The other four are: minimizing the impact, rectifying or repairing the impact, reducing the impact over time, or compensating for the impact (CEQA Guidelines §15370).

Response to Comment A3-48

The commenter states that the PEIR mentions Mud Creek, Big Chico Creek, and Butte Creek watersheds but not Sycamore Creek, Little Chico Creek, or the Sacramento River watershed of which all these creeks are a part.

Hydrologically, Sycamore and Mud Creeks are part of a single watershed and Little Chico Creek is classed as part of the Butte Creek system (WYGISC 2014), but the passage description in the PEIR has been revised.

Response to Comment A3-49

The commenter states it is wrong to say all treatments "could" disturb wildlife because all treatments will disturb wildlife.

The treatments will disturb wildlife if wildlife is present at the time the treatments are implemented and are individuals or species not thoroughly habituated to vegetation management in Chico parklands.

The commenter states that direct impacts to wildlife are only unlikely if the SPRs are followed.

Yes. Ensuring that activities are implemented in accordance with all SPRs is the responsibility of the Field Supervisor on the work site.

The commenter asks, "*The checklist item states that impacts will be "Less than significant with Mitigation Incorporated" yet here you have concluded that direct impacts to special-status wildlife may be potentially significant, how can it be both?"*

It is common to state that impacts could be potentially significant before mitigation but less than significant with mitigation incorporated.

The commenter asserts, "The mitigation measure that will cause the impacts to be LTS is an 'ex post facto' mitigation and does not prevent the impact, which can be interpreted as a statement of overriding consideration to allow the impact and then try to make up for it through compensation."

No. No activity would be allowed to go forward under the scope of the PEIR unless adequate mitigation (which can indeed be compensatory under CEQA – see Guidelines §15370) were deemed sufficient **in advance**. That determination is not the City's call to make; it belongs to the USFWS and/or CDFW to make that determination. Determining whether mitigation would be feasible is a step taken before implementation, when the Project Consistency Checklist is still being filled out and the project has not yet been approved. This is stated in the Project Consistency Checklist and referenced in the text of both BIO mitigation measures.

Response to Comment A3-50

The commenter asserts the PEIR's discussion of GHG impacts was inadequate.

CEQA explicitly allows a lead agency to "describe" GHG impacts "qualitatively" (Guidelines §15064(a)(2)) in a programmatic EIR. CEQA specifies no particular model or methodology for doing so. The State has not developed specific GHG thresholds of significance for use in preparing environmental analyses under CEQA, and the Butte County Air Quality Control District has not adopted GHG thresholds to determine significance. Projects undertaken under the VFMP would not violate the air quality standards of Butte County or conflict with Chico's Climate Action Plan and would not result in a cumulatively considerable increase in emissions, for reasons discussed below.

The commenter asserts that the VFMP program of work, by cutting or burning some vegetation, would reduce carbon sequestration significantly and require mitigation such as planting trees elsewhere.

This is not supported by the ecological literature or the California Forest Carbon Plan. In dry Californian woodlands that have missed multiple fire intervals, even aggressive thinning usually improves carbon stability compared to doing nothing.

Californian woodlands store more net carbon when they are regularly burned and/or thinned (FCAT 2018)**.** This is primarily because regular burning allows woodlands to concentrate carbon in very large and stable pools – i.e., widely spaced, large trees that live a long time, plus soil that builds deep stock of carbon through the accumulation of *pyrogenic carbon* (charcoal), a form of carbon that resists decomposition for many centuries (Maestrini et al 2017). The large trees characteristic of regularly burned woodlands can rapidly re-sequester any carbon lost through underburns. Woodlands with many, smaller trees are less carbon-stable both because smaller trees store less carbon (Stephenson et al 2014) and because these forests do eventually burn with catastrophic intensity, releasing extreme amounts of carbon all at once (North *et al*. 2009; Hurteau *et al*. 2008) while *also* removing most green vegetation that could re-sequester that carbon in the short-term.

Although treatment may temporarily depress carbon sequestration, dry woodlands recover all the carbon lost to treatment in less than one fire return interval (Hurteau and North 2010; Wiechmann et al 2015). Furthermore, when treated (thinned or underburned), dry forests are better able to sustain their carbon sequestration rates even when stressed by drought or extreme heat (Dore et al 2012), while unthinned adjacent stands can even experience negative ecosystem productivity (loss of carbon). Given the expected impacts of climate change, this finding is an important consideration for twenty-first century parks managers.

The commenter states the City is expecting all Chico parklands will eventually burn, one way or another and that the City's expectation is "totally untrue".

The comment is noted.

The commenter states that since grazing animals could be brought onto Chico parklands to reduce vegetation, and livestock produce methane, the GHG impacts of grazing should have been discussed in the PEIR.

As stated above and in the VFMP, targeted grazing is done under contract with a livestock professional for specified periods of time. Chico's use of contract grazer services does not significantly increase regional demand for livestock because, if municipal vegetation management contracts suddenly ceased to exist, it would not compel contract grazers to abandon the livestock business. Instead, grazers could easily graze their livestock in a variety of other places, save most of the expense of moving animals and complying with detailed SPRs, and still make revenue because there would still be the same market for livestock in the form of meat. The City finds its contribution to the statewide or regional demand for livestock is insignificant.

The commenter points out that allowing woody debris to slowly decompose builds stable carbon in soils.

This is true, and many techniques in the VFMP are prescribed to facilitate this natural cycling – for example, cutting up large fallen logs until they are in contact with the ground, and chipping and spreading smaller woody debris so it can decompose faster. However, there is a limit to decomposition's contribution to the carbon cycle in dry Western woodland ecosystems. In dry systems, wood does not decompose very rapidly (especially if it is not chipped), which is why it builds up as deep surface fuels on the floor of Californian woodlands (but not Eastern woodlands) until it burns. **Fire is the primary nutrient cycler in dry Western forests**. Again, as stated above, frequent small fires do release carbon (as does decomposition also), but small fires prevent larger fires that would release extreme amounts of carbon.

The City continues to find the GHG impacts of the program would not be significant and no mitigation is needed.

Response to Comment A3-51

The commenter requests the use of the common name "poison oak" for Toxicodendron diversilobum;

The change has been made and the statement about tick-borne hazards has been clarified in the PEIR

The commenter feels it is unnecessary to list human-caused wildfires as well as naturally caused wildfires as hazards.

Distinguishing between human-caused and natural hazards is common. The PEIR does not imply that the results or potential hazardousness of these two sources of wildfire are different.

The commenter states that increased prescribed fire and wildland fire use could increase the populations of Toxicodendron diversilobum and of ticks.

Upon reflection, the City agrees it is reasonably foreseeable that both populations could increase in at least some areas. People can still protect themselves from both hazards by staying on trails. The passage has been revised.

The commenter states that prescribed fire could encourage mountain lions and snakes to migrate out of burned areas and into areas where people recreate.

While animals do, in general, try to move out of the way of fire as much as they can, these two species of animals also try to avoid populated areas, and would not likely move toward people when they have the opportunity to move away from areas humans use. When confronted with fire, snakes cannot always escape it overland, but can easily slip underground (where they spend most of their time regardless and where much of their food source is also hiding) to avoid fire. Mountain lions have large (80-200 square mile) home ranges, so the average prescribed fire is quite small in relation to their home range and is unlikely to alter their movements very much.

Response to Comment A3-52

The commenter acknowledges that many pesticide applications do not require public notice but recalls that City staff "promised" to notify the public of herbicide applications in lieu of the Park Commission creating a policy regarding the issue. The commenter also states, "California's Community Right-to-Know Act requires public entities to inform about the use of materials that may be hazardous." The commenter furtherstates, "Cost should not be a factor with informing the public and should be included in the budgets for every project that requires the use of a pesticide."

The public is and will be informed as described in the PEIR. Cost, staff time, and institutional

capacity in general is always a factor: City resources are not unlimited, and the City has a duty to be a responsible steward of public resources, including the City budget of tax revenue.

The City is indeed honoring the 2012 Community Right to Know Act by informing the public within this PEIR about use of materials that may be considered hazardous ('Caution' label herbicides, 'Warning' label additive a concern only to the Applicator during the process of treatment) and under what circumstances (e.g. Appendix E examples of what weed, site type, season, in an IPM context) those materials may be used. Beyond this information, disclosure about use is already conducted via pre-existing use reporting requirements for herbicide application to the County Agricultural Commissioner's office. There is no requirement in the Act regarding signage of herbicide treatment areas; rather, signage falls within existing pesticide regulations (specified by the herbicide product label). Instead, the public notification is the VFMP/PEIR, and also the blue indicator dye prescribed (by the PEIR) with all City park herbicide applications. This dye remains visible well after the few minutes of potential exposure (i.e., well after the treatment is wet on the target surface before being absorbed into the weed). Furthermore, during the short interval of potential exposure while the treatment is still wet, the PPE-clothed licensed Applicator is present on site. No signage is necessary if the Applicator is present to inform anyone who asks.

The commenter states, "Applicators are required to be up to date on the Safety Data Sheets (SDS) for every material they work with, the public should also be informed. In many poisoning cases it isn't the pesticide that causes the problem it is the additional material in the application.

Safety Data Sheets and Labels are readily available online for herbicide products, for example here: http://www.cdms.net/Label-Database. Here are herbicide products used on City park land during 2020:

active ingredient	product name
triclopyr ester	Garlon 4 Ultra
glyphosate	Ranger Pro, Rodeo
imazapyr	Polaris
aminopyralid	Milestone
glufosinate	Cheetah Pro
oxadiazon	Ronstar Flo

The commenter is correct that exposure is always to a whole product, not an active ingredient. Therefore, MSDS data sheets are written for products, not active ingredients. However, Appendix E and most technical guidance (e.g. issued by University of California IPM fact sheets) are written for active ingredients whenever possible, to provide transparency and flexibility and to avoid using public funds to endorse a particular product. The licensed Applicator is required to label their herbicide containers with the product name and, by State law, report their product use monthly to the County Agricultural Commissioner's office.

Product trade names and availability change every year. Therefore, within the existing VFMP PEIR specifications (e.g., only Caution herbicide products; treatments according to Label instructions or a Pest Control Advisor Recommendation), the specific products used each year can and should vary slightly from year to year. One reason for this is that, periodically, safer and more environmentally benign products are developed, and the City should be open to using them.

Response to Comment A3-53

With regard to PEIR page 127, the commenter questions whether "the vegetative fuel load around

One-Mile is within the desired range for the vegetation community".

The commenter is correct that the One-Mile area is not homogeneous, and the section is poorly worded. It has been revised for clarity.

Response to Comment A3-54

The commenter asks, "*The* FRI [fire return interval] is *difficult and almost impossible to determine yet the VFMP and DEIR state that it is 5 –12 years. How accurate is that?* "And *"What is the natural FRI vs. the human-caused, post-settlement FRI?"*

The commenter is correct that FRI is very difficult to determine, especially in grassland. Even in wooded areas, FRI estimates are likely to be underestimates because not every fire leaves a mark that can be seen by scientists hundreds of years later (e.g. a tree ring scar or charcoal deposition). The FRI data used in the VFMP is considered the best available for California and was developed by the USFS Pacific Southwest Region Ecology Program (PSW 2011). To compile this dataset on pre-settlement FRIs (fire return interval), USFS ecologists conducted an exhaustive, 298-source review of the fire history literature, expert opinion, and vegetation modeling pertaining to mean, median, minimum, and maximum fire return intervals prior to significant Euro-American settlement (i.e., the middle of the nineteenth century). Sources included fire histories derived from dendrochronological and charcoal deposition records, modeling studies, and expert quantitative estimates (Van de Water and Safford 2011). These FRI estimates include Native cultural (human-caused) burning because cultural burning, just like natural ignition, has been an evolutionary pressure on Californian vegetation for many thousands of years – more than long enough to shape a stable and characteristic cultural-fire-adapted vegetation community – and there is no way to distinguish a fire scar caused by a lightning ignition from a fire scar caused by a cultural burn.

The USFS ecology dataset does not include FRIs for grassland areas (e.g. the Valley floor), only for woodlands/brushland. The dataset classes most of Upper Park and all of Lower Park as having a mean (average) FRI of 12 years and a minimum FRI of 5.

USFS ecologists also determined contemporary (i.e., post-settlement) FRIs. These were calculated using the California Interagency Fire Perimeters database (maintained by the California Department of Forestry and Fire Protection (CALFIRE-FRAP). The ecologists found that the post-settlement FRI is considerably greater than pre-settlement, even after accounting for prescribed fires. The table below summarizes the contemporary FRI of Bidwell Park lands. (It accounts for the Stoney and Santos fires, which are not accounted for in the 2011 dataset.)
This table expresses the degree of fire return interval departure (FRID) for most wooded lands in Bidwell Park. A FRID of 40% means that a unit of land misses about 40% of its fire returns (i.e., it is only burning about 60% as much as it should).

Contemporary FRI	% of total Bidwell Park acres*	Fire Return Interval Departure
20-25 years	7.7%	45%
34 years	9.6%	65%
51 years	35.6 %	77%
103 years	47.1%	88%
*Only Bidwell Park acres with pre-settlement mean FRI of 12. This excludes all Park acres that are primarily grassland, water, or very rocky. However, it includes most of the wooded parts of Upper Park and all of Lower Park.		

Finally, the commenter argues that acknowledgments of the historical events which resulted in an ecological hazard "while they may be true, don't belong in an EIR." The comment is noted.

Response to Comment A3-55

The commenter asks for more context regarding the table on page 147 of the PEIR. The commenter asks what torching fire means.

Torching fire means "the burning of the foliage of a single tree or a small group of trees, from the bottom up" (NWCG 2020). Conifers are not the only trees that can torch; eucalypts are well known for this talent. Oaks can also torch, and not only if they are covered with dry ivy or surrounded by ladder fuels. Oaks have many cavities as well as ground-level scars or "catfaces" which often contain dry flammable material. During a fire under dry and windy conditions, an ember can land in one of these cavities, or dry grass can transmit fire to a ground-level cavity, in either case igniting an oak from the inside. This is why prescribed fire practitioners usually rake fuel from around the base of legacy oaks and then watch them carefully to ensure they do not ignite.

The table summarizes the fire behavior predicted by the wildfire risk assessment conducted for Deer Creek Resources to inform the VFMP (VFMP 6.1). For more on how this assessment was conducted, see response to comment A3-17.

Response to Comment A3-56

The commenter feels that language already used in the document should not be reprinted on top of the project consistency checklist.

The comment is noted; while repetitive, this was done to make sure whoever uses the checklist in the future has all relevant information without having to search and bookmark the entire PEIR.

The commenter asks how a "future" activity can be a "later activity". The future is later in time than the present. The commenter also asks why the City does not just call the project consistency checklist an environmental checklist for a CEQA document.

While the project consistency checklist is heavily based on the classic CEQA environmental checklist, it has been customized with a few Chico-specific and VFMP-specific resource impacts for managers to analyze. This is standard for programmatic vegetation management EIRs.

Response to Comment A3-57

The commenter's remaining comments deal with Appendix E (not C), "Some High Priority Invasive Species and Best Practices for Their Removal".

The title of this appendix has been revised to read "And Some Best Practices for Their Removal" because the list was never intended to be exhaustive or apply in every circumstance.

The commenter challenges the statement, "It is not practical to remove every exotic plant from Chico parklands," arguing that it is not practical to ignore them, either.

The City agrees it is much better to remove invasive exotics aggressively, but simply does not have the resources to do so, even with considerable volunteer labor from great groups like Friends of Bidwell Park. A main reason for this is that CEQA still needs to be satisfied, in some form, on every invasive-plant-removal project, whether implemented by City employees or volunteers. The VFMP PEIR represents an effort to streamline the City's CEQA workflow so not every project needs to go through a Notice of Exemption, Negative Declaration, or Mitigated Negative Declaration. This streamlining process will only be effective if the City can also develop a master maintenance LSA with CDFW. Assuming CDFW issues that agreement and the VFMP PEIR is certified, then in the future, if the Commission so chooses, future invasive-plant-removal projects that are within the scope of the VFMP PEIR could be authorized with the Project Consistency Checklist and a simple signed

determination; each project could commence as soon as its determination is signed.

The commenter asks for an explanation of the statement, "Some plants are so naturalized that the costs of removing them do not justify the benefits."

Some examples of this class of plants would be wild mustard (*Brassica* spp.), dock (*Rumex crispus*) or filaree (*Erodium* spp.) These plants are non-native and can surely be invasive, and one commenter on the VFMP asked for them to be included in a list of non-native plants to be targeted for removal, but complete eradication of these plants would be almost impossible and would not significantly reduce fire risk or other hazards to people or wildlife. (All three species are edible to humans and most wildlife.)

The commenter states, "The City does not have an active EDRR program. By the time they are notices [sic] exotics and invasives have gained a foothold in the Park. Most of the priorities have been developed and promoted by third parties and not the Park Division or staff."

The comment is noted. The City's resources to address invasive plant detection are extremely limited. Incorporating EDRR into reconnaissance-level surveys could slightly boost the number of invasives populations that are detected early enough to be eradicated but will still survey only a tiny fraction of Chico parklands each year.

The commenter states that Ailanthus and privet have both been successfully eradicated from Bidwell Park, while bladder senna was "controlled" but is coming back because of lack of follow-up.

The comments are noted.

The commenter states that Catalpa should be a priority weed. Catalpa is a high-priority weed as listed in Appendix E.

The regulatory environment for removing riparian trees (even invasive ones) is indeed time-consuming and expensive to navigate. In addition to doing CEQA itself, the City needs a "1600" permit from CDFW (which can cost thousands of dollars and may only be valid a short amount of time) and may need to consult with USFWS if the invasive tree is shading an anadromous stream. This is a major reason the VFMP PEIR was developed in the first place: to streamline the Parks Division's CEQA workflow so not every project needs to go through a Notice of Exemption, Negative Declaration, or Mitigated Negative Declaration. This streamlining process will only be effective if the City can also develop a master maintenance LSA with CDFW. Assuming CDFW issues that agreement and the VFMP PEIR is certified, then in the future, if the Commission so chooses, future invasive-plant-removal projects that are within the scope of the VFMP PEIR could be authorized by completing the Project Consistency Checklist and a simple signed determination; each project could commence as soon as its determination is signed.

The commenter also requests the City devote more resources to eliminating English ivy.

The comment is noted.

The commenter remarks, "If Appendix C [E] is to be used as a guide it would help to have pictures of the plants listed in it to give implementers an idea of what the plant actually looks like."

The comment is noted; this seems like a good idea and would not be difficult to carry out.

The commenter states that all of the control methods listed in Appendix E involve herbicide use, yet manual control is often very effective, and herbicides should be used as a last resort per IPM strategies.

The City agrees (SPR-HAZ-6) and states its commitment to IPM methods in the first paragraph of Appendix E. Appendix E dwells on herbicide-based control methods simply because those methods

are the most difficult to learn. Even experienced implementers may not automatically know the best herbicide application strategies for every weed they may encounter. It is hoped that Appendix E will facilitate the transfer (and further refinement) of knowledge gained over decades of work and observation by qualified City applicators.

The commenter states that saplings can be removed using the correct hand tools.

The comment is noted.

The commenter corrects the section on blackberries, pointing out that Rubus discolor is not native while Rubus ursinus and Rubus leucodermis are.

He is right; the section has been revised.

The commenter states that goats and fire are not effective at removing blackberry.

The City agrees; Appendix E already states that these methods are not effective as long-term control. They can merely remove biomass for a single season, enabling an herbicide applicator to finish the job.

The commenter states that punctureviné can be removed manually with a trowel (during the flowering stage).

The comment is noted.

The commenter states that pokeweed can easily be removed by hand if pulled in its first year of life, and that an active EDRR program is essential with pokeweed.

These comments have been incorporated into Appendix E.

The City thanks Mr. Barrett for his comments.

Letter B1: Daniel Machek

Scoping comments on VFMP aaVFMP Comments ×

Daniel Machek <danmachek@icloud.com> Wed, Dec 16, 2020, 6:04 PM

to me

Wolfy,

I would like to see Mechoopda tribe involved and leading vegetation management using Traditional Ecological Knowledge style vegetation management. On the Chico VFMP.

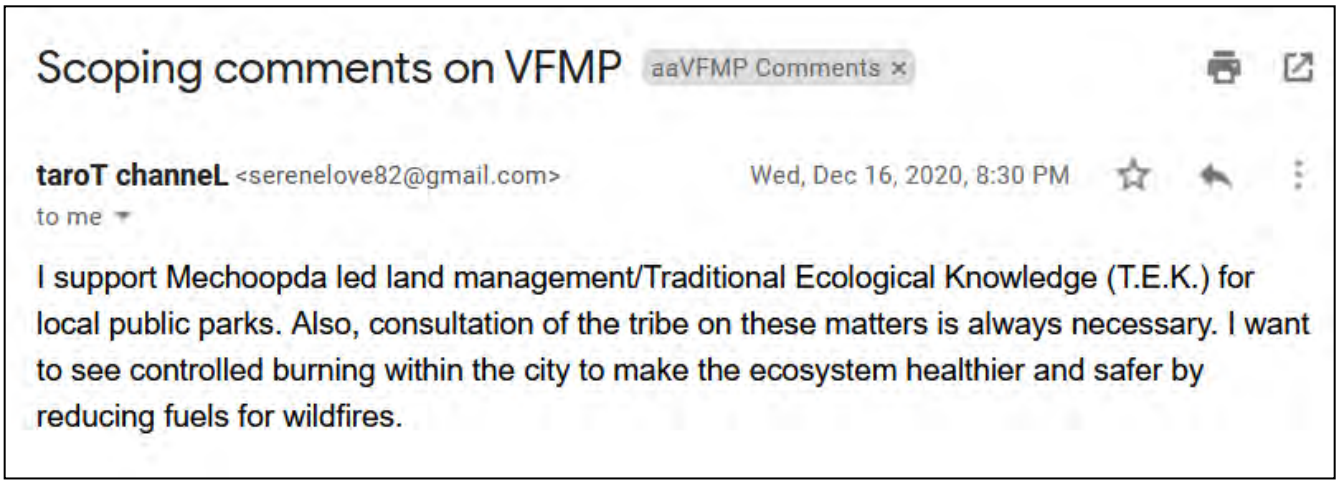
Sent from my iPhone

Reply Forward

Response to Comment B1

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The City thanks the commenter.

Letter B2: Tarot Channel



Scoping comments on VFMP aaVFMP Comments ×

taroT channeL <serenelove82@gmail.com> Wed, Dec 16, 2020, 8:30 PM

to me

I support Mechoopda led land management/Traditional Ecological Knowledge (T.E.K.) for local public parks. Also, consultation of the tribe on these matters is always necessary. I want to see controlled burning within the city to make the ecosystem healthier and safer by reducing fuels for wildfires.

Response to Comment B2

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The commenter is also advocating for controlled burning within the City. Refer to **Master Response 2: Prescribed Burning in the Parks.** The City thanks the commenter.

Letter B3: Anonymous 2:31 pm

---------- Forwarded message ---------

From: <noreply@getstreamline.com>

Date: Thu, Dec 17, 2020 at 2:31 PM

Subject: New form submission received: City of Chico Vegetative Fuels Management Plan EIR

To: <thad@bcrcd.org>

City of Chico Vegetative Fuels Management Plan EIR

You can email PEIR comments using the link above. But if you prefer, you can submit a quick comment right through this form . If you'd like a response, make sure to let us know how to reach you.:

Hello, The number one priority I want see is Mechoopda led land management. They are prepared, trained and they understand the privatizes and technology to take care of the land here.

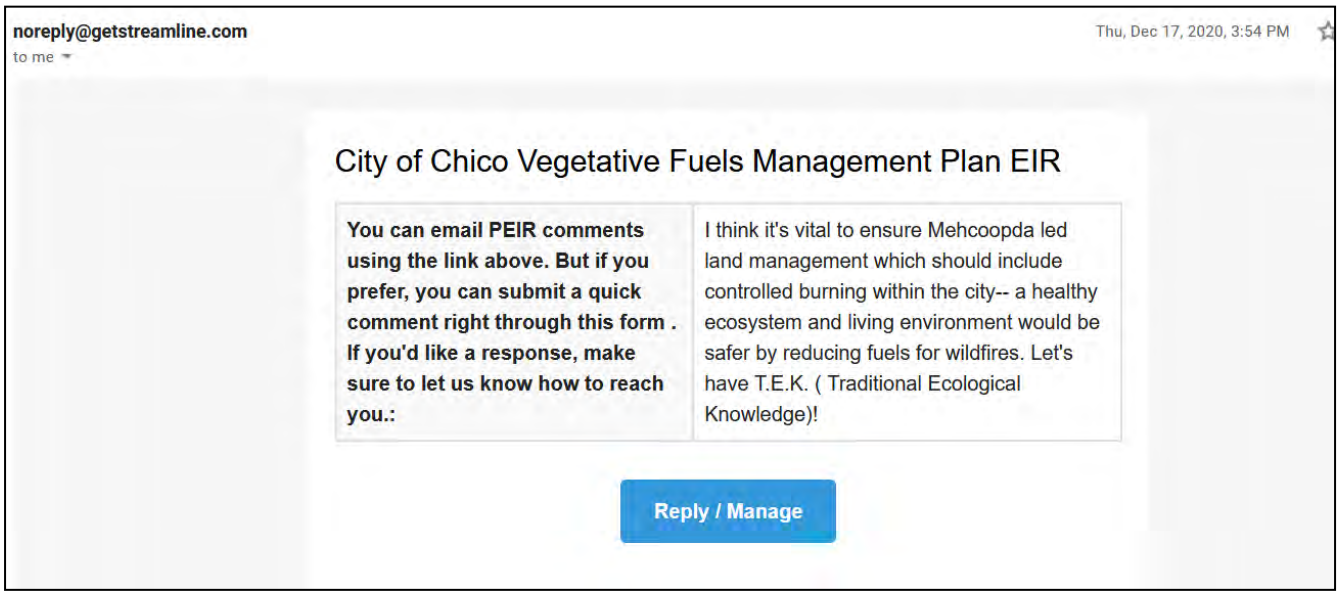
Reply / Manage

Powered by Streamline.

Response to Comment B3

The commenter is advocating for Mechoopda-led land management. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The City thanks the commenter.

Letter B4: Anonymous 3:54 pm



Response to Comment B4

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The commenter is also advocating for controlled burning within the City. Refer to **Master Response 2: Prescribed Burning in the Parks.** The City thanks the commenter.

Letter B5: Justin Lin

From: Justin Lin <jjl2185@columbia.edu>
Sent: Thursday, December 17, 2020 3:10 PM
To: Linda Herman <linda.herman@Chicoca.gov>
Subject: PUBLIC COMMENT FOR City of Chico Vegetative Fuels Management Plan EIR

Dear Ms. Linda Herman,

I was able to review the Vegetative Fuels Management Plan and strongly advocate for a Mehcoopda led land management, with local controlled burning within the city ecosystem to make it healthier and safer by reducing fuels for wild fires.

Putting Butte county in line with Traditional Land Management and Tribal T.E.K. (Traditional Ecological Knowledge) in our local public park's land management would deeply enrich our existing practices and local safety.

If you have any questions do not hesitate to reach out.

Warm Regards,

Justin Lin
jj2185@columbia.edu
Former Advisor to Chico Youth Court/Circles of Justice

Response to Comment B5

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The commenter is also advocating for controlled burning within the City. Refer to **Master Response 2: Prescribed Burning in the Parks.** The City thanks the commenter.

You can email PEIR comments using the link above. But if you prefer, you can submit a quick comment right through this form . If you'd like a response, make sure to let us know how to reach you.:	This document goes further than most municipal open-space management plans in acknowledging the historical role of Indigenous peoples in creating and maintaining open spaces considered "natural" in and around Chico. However, there are several ways this document, in its description of scope of work and best practices, can better reflect the current existence, capacity, and protected cultural resources of the federally-recognized Mechoopda Indian Tribe as defined in the document itself, as well as the new guidelines set by California Assembly Bill 52. The Tribe has recently released a document compiled by its Office of Environmental Protection (called "Ecology of Maidu Territory") that lists and details a number of culturally significant species to the Tribe. These include several species that are targeted for management throughout the PEIR document, including blue oak, grey pine, deer grass, willow, as well as several native riparian species not mentioned in the document that are essential for maintaining healthy riparian habitat. As an ecologist who has studied Traditional Ecological Knowledge extensively over the past decade, I know the concept of "cultural keystone species" (Julia Wilson, LO-TEK, Taschen, 2019) is well established in the academic literature, showing that keystone species of most ecosystems are also culturally significant to the Indigenous peoples who have lived in, maintained, and co-evolved with those ecosystems. The text of this document should establish and reflect a meaningful commitment by the City to develop an ongoing consultation process with the Tribe in the management of these cultural keystone species as defined by the Tribe. This affects several management areas in the PEIR, including Bidwell Park, all riparian zones, and oak woodland areas. To give an example, herbicides should not be applied near willow, redbud, or other species culturally significant to the Tribe for basket making, as basket weavers gather these materials (an activity which is also essential to the species' healthy lifecycle) and must handle these materials in their mouths while weaving. A simple sentence added to each section that the City will comply with AB52 by developing an ongoing consultation process with the Tribe's THPO agency on culturally significant species can codify this commitment in the VFMP. In addition, Mechoopda Tribal members are currently actively engaged in the maintenance of culturally significant species as part of their living practice, and have been engaged in educational efforts, as well as contracted field operations, to train both Native and non-Native community members in the proper maintenance of the ecosystems that support these species. This living, locally specific knowledge is also a cultural resource, and can greatly enhance the quality of vegetative management and ecosystem resilience beyond the current scope of the Plan. Ongoing consultation and agreements with the Tribe to allow Tribal members access to contracting and work agreements with the City on Park properties containing cultural and sacred sites fulfills the intent of AB52 to enable Tribes "to manage and accept conveyances of, and act as caretakers of, tribal cultural resources" (AB52, Section 1). This is especially relevant, but not limited to, the management plans for Upper and Middle Bidwell Park (Sections 2.1.1 and 4.1), Verbena Fields, Riparian zones, and other sites discoverable through Tribal consultation in the CEQA process. In regards to Upper and Middle Bidwell Park, the PEIR itself lists "cultural heritage" among the "natural values" that are prioritized in its management plan (pg.12). The keepers of that cultural heritage are still here, and the City should ensure that economic benefits pursuant to vegetative management projects in these culturally significant areas should accrue to Tribal members where they have the capacity to do the work – which can only be defined through consultation. In addition, the application of "prescribed fire" in the Management Plan can and should also benefit greatly through consultation with the Tribe, who had maintained optimal fire management practices in these ecosystems for thousands of years, and where current Tribal members hold relevant certifications to conduct prescribed burns. Thanks, Meleiza Figueroa email: melfig@cooperativenewschool.com

Comment B6-1

Comment B6-2

Comment B6-3

Response to Comment B6-1

The commenter refers to the list of culturally important plants created by the Mechoopda Tribal Office of Environmental Protection.

This document, which does not provide detailed management guidelines, but rather describes the special cultural significance of various plant and fungal species, was provided by the Office to the VFMP team during plan revisions. The team enjoyed reading the document and expressed interest in learning more about culturally significant Maidu plants. However, even on the strength of a well-written inventory of important cultural species, it is not appropriate for the City to develop particular management guidelines on the basis of cultural significance until asked to do so by the Tribe. The THPO was consulted during the PEIR process and did not request changes to herbicide use guidelines (the example used by the commenter) or to any other particular management standards. However, the THPO did request an ongoing consultation process that would occur on a project-by-project basis. Since only the Tribe can specify whether it finds a given management action acceptable or not, since Tribal priorities could change over time, and since the Tribe may choose to consult on some projects but not others, the City agrees it is most efficient to consult on projects one at a time. Therefore, under the PEIR, management decisions developed through consultation would be made on a site- and season-specific basis.

The commenter asks for a sentence to be added to each section of the VFMP stating that the City will comply with AB 52 by developing an ongoing consultation process with the Tribe's THPO officer on culturally significant species.

Instead of being incorporated in the VFMP, this language is found in the PEIR, under section 4.18, Tribal Cultural Resources. The PEIR is the better place for this language because it is a formal CEQA document. No projects contemplated in the VFMP could go forward without being reviewed for consistency with the PEIR through the Project Consistency Checklist, which itself requires tribal consultation.

The PEIR requires that, pursuant to AB 52 and CEQA, each project within its scope undergo a simple and timely tribal consultation step which will give the Tribe the opportunity to recommend changes, request the opportunity to gather culturally significant plants that may be pruned or removed, and have a cultural monitor present if it chooses. Living cultural resources (i.e., plants of ethnobotanical significance) already receive the same protection under AB 52 as cultural artifacts, so there is no need for the PEIR to treat them differently. Finally, because only the Tribe, as a sovereign government, can define which cultural resources are significant to it, it is not appropriate for the City to specify in advance which species, communities, or sites count as living cultural resources.

Response to Comment B6-2

The commenter requests that Mechoopda work crews, educators, and/or fire practitioners be given access to contracts pertaining to vegetation management in culturally significant areas.

This access already exists in the sense that Mechoopda crews and practitioners are welcome to access the bidding and contracting process on any City project. The PEIR does not change City procurement or contracting policies. Within (or, indeed, outside of) the tribal consultation process, the City and the Tribe can develop a closer working relationship, which could lead to the development of a master services agreement (MSA) under which Mechoopda tribal enterprises could become City contractors.

Response to Comment B6-3

The commenter remarks that prescribed fire activities are ones in which Mechoopda people have special expertise as the original fire practitioners of this place and carriers of a strong fire tradition.

The City agrees that incorporating a Tribal perspective into prescribed fire activities is valuable whenever possible, and the tribal consultation step built into project development under the PEIR is intended to make this simpler than it has been in the past. The City thanks the commenter.

Letter B7: Ali Meders-Knight

My name is Ali Meders-Knight and I am a local Tribal member with the Mechoopda Indian Tribe. I am a traditional basket weaver and traditional practitioner of Traditional Ecological Knowledge also known as (T.E.K.). Since early 2000 I have taught local citizens about Mechoopda cultural practices within Chico's City Parks and not only consider the plants in these city parks cultural resources, but the ecologies themselves. The relationship between Mechoopda Tribal communities and the management of our ecosystems is a well documented local historical legacy. I am submitting several comments for this PEIR for your consideration in this fuels management plan. My contact email for this comment is tekstewardship@gmail.com and my telephone contact is (530) 838-5350 In 2006 the City of Chico and the :Mechoopda Indian Tribe of Chico Rancheria entered into a Memorandum of Understanding (MOU). This agreement was formed in compliance with California Senate Bill 18 which requires the City of Chico to consult with the Mechoopda Tribe prior to the adoption of any amendment to the General Plan, adoption of any specific plan,(in this case the VFMP). The consultation for this MOU does not require the Mechoopda Tribe to be consulted for the development of the plan but does require Tribal consultation defined as "meaningful and timely process of to notify ,discuss, and consider carefully the views of others, in a manner that is respectful of each other's cultural values and where feasible, to seek agreement" before it's adoption into policy. This consultation would most likely result in agreements that would require not only Registered Professional Forester but Tribal Land Managements Agreements as well for management standards. The City's MOU Agreement with the Mechoopda Indian Tribe should be cited and included in this PEIR to further explain the process of how this VFMP is adopted into Chico's General Plan as well as included Tribal Agreements after Tribal Consultation is officially implemented. Under Section 2.5 Verbena Fields the PEIR states that the City of Chico and Mechoopda CAN develop a M.O.U for land management and the City ALREADY has an M.O.U. with the Mechoopda Indian Tribe. The M.O.U. has specific language that can address a collaborative management plan with Mechoopda through consultation in regards to Mechoopda's tribally significant plants and ecosystems. The contracted work on Mechoopda Culturally significant sites and resources should be designated as sole source contracting to Mechoopda if the Tribe shows the capacity to fulfill the contractual requirements for the scope of work. The only way to determine if the Mechoopda Tribe has capacity for some or all land management contracts is to consult with the Mechoopda Tribe and form an agreement. Thank you for considering my comments for the City of Chico's Vegetative Fuels Management Plan of Parks,Greenways, and Open Spaces.Preservation Office and Office of Environmental Protection and Planning are well established agencies within the Mechoopda Tribal government that have participated in the development of Verbena Fields and have the capacity to consult on additional standards of management of "Valley Oaks", "Grasslands", or "Riparian" based on T.E.K. (Traditional Ecological Knowledge). This PEIR should include that the M.O.U does exist and direct the City to consult with Mechoopda and appoint a Tribal Technical Advisor as stated in the M.O.U to facilitate an Agreement. Additionally Assembly Bill 52 (AB52) states that California Tribes have rights to manage their own cultural resources within their designated territory and this includes culturally significant plants and ecosystems. The contracted work on Mechoopda Culturally significant sites should be designated as sole source contracting to Mechoopda if the Tribe shows the capacity to fulfill the contractual requirements for the scope of work. The only way to determine if the Mechoopda Tribe has capacity for some or all land management contracts is to consult with the Mechoopda Tribe and form an agreement. Thank you for considering my comments for the City of Chico's Vegetative Fuels Management Plan of Parks, Greenways, and Open Spaces"

Comment B7-4, continued

Comment B7-1

Comment B7-2

Comment B7-3

Comment B7-4

Comment B7-5

Comment B7-6

Response to Comment B7-1

The commenter describes the MOU between the City of Chico and the Mechoopda Tribe dated August 5, 2008.

This MOU was developed during the Chico General Plan 2030 update process (2007-2011), pursuant to SB 18 (2004), which requires a City or County to undertake tribal consultation when developing any general or specific plan or designating any open space. A general or specific plan is a plan that designates land uses (e.g., zoning). General or specific plans are developed by planning commissions and may result in the establishment of new parklands or open space. By the same token, they may result in the conversion of some open space to other land uses, such as residential or commercial developments.

The commenter states the VFMP is a specific plan and thus subject to SB 18.

The VFMP is not a specific plan because it does not alter or establish any land use. Rather, it is a management plan that only addresses how existing parklands and open space will be managed to meet the objectives that have already been defined for these land uses. (These objectives were defined in Chico's General Plan (2011) and the Bidwell Park Master Management Plan (2008)). Therefore, SB 18 does not apply to the VFMP process. However, the 2008 MOU was still consulted during preparation of the PEIR to make sure the PEIR would comply with, and build upon, the MOU.

While the two-page 2008 MOU defines what consultation means and sets goals for the City and Tribe to work together to develop a cultural resources plan (subject to funding availability), more detailed, area- and resource-specific plans would need to be developed before the City and the Tribe could be said to have a land management agreement.

While SB 18 does not apply to the VFMP process, AB 52 (2014) absolutely does apply to the VFMP, its projects, and its PEIR. AB 52, which did not exist at the time the 2008 MOU was signed, is in many ways a stronger piece of legislation, requiring tribal consultation not merely for general and specific plans and for new open space designations, but for virtually every project under CEQA.

Response to Comment B7-2

The commenter states that consultation could eventually result in development of land management agreements between the City and the Tribe.

The City agrees. The VFMP PEIR creates a framework for frequent, ongoing consultation that is likely to strengthen each party's ability to communicate with and understand the needs of the other over time. As both parties develop their capacities over time, more detailed agreements to collaboratively manage land are a reasonably foreseeable result.

Response to Comment B7-3

The commenter requests that the 2008 MOU be cited and included in the PEIR.

The MOU was referenced and described in the draft PEIR but was not fully cited and was not included or appended. The change has been made. The MOU is also attached at the end of this response for readers' reference.

The commenter also requests that the PEIR further clarify how the VFMP is being adopted into Chico's General Plan.

The VFMP will not be adopted into the General Plan because it does not alter any land use. The commenter also requests that any Tribal agreements developed through tribal consultation be incorporated into the PEIR. Currently, all agreements and requests pursuant to tribal consultation regarding vegetation management to date have been incorporated into the PEIR. It is certainly feasible to incorporate future Tribal agreements that may be developed into a future revision of the PEIR. This

would be a logical step but would not be legally necessary unless the tribal agreements specified actions that are not currently within the scope of the PEIR. Examples of actions that are not within the scope of the PEIR include grading, bulldozing firelines, igniting prescribed fire very close to creeks if using drip torch fuel, removal of healthy native trees resulting in an average density of less than 70 trees per acre, or work during very wet weather.

Response to Comment B7-4

The commenter requests that vegetation management contracts be issued to Mechoopda tribal crews under a sole source contracting arrangement if the crews have the capacity to do the work.

This was not requested during the formal tribal consultation when the PEIR was prepared, but if it is requested by the Tribe in the future the City can respond. The PEIR does not alter existing City procurement policy which allows the Public Works Department to develop consulting agreements up to $50,000 in value without engaging in the bid process, i.e., having to issue a formal request for proposals (RFP). If an agreement is to address an ongoing need on an on-call basis, it is called a Service Provider Agreement (SPA) with specific attachments tiered off the SPA for individual activities or projects. If the agreement is for a one-time significant project, it would be called a Professional Services Agreement (PSA). Either agreement example carries a stipulated term (usually from 1-5 years) during which those funds can be spent.

Response to Comment B7-5

The commenter requests that the PEIR reflect the existence of the 2008 MOU (done; see response to comment B7-3). The commenter also requests that the City appoint someone to the role of tribal technical advisor.

The City's Community Development Director, Brendan Vieg, currently fills the role of the Tribal Technical Advisor and is the City's liaison for all consultation *pursuant to SB 18*. This role is therefore restricted to consultation connected to general and specific plans. For consultation pursuant to the VFMP PEIR, the Tribe would likely be contacted by the Public Works Director or delegate, or a City-employed or -contracted vegetation manager, field supervisor, or forester.

Response to Comment B7-6

The commenter states that under AB 52, Tribes have rights to manage their own cultural resources within their designated territories and this includes culturally significant plants and ecosystems.

The commenter is correct that AB 52 defines "tribal cultural resources" such that living resources such as landscapes are included. Regarding a Tribe's rights to manage resources, AB 52 defines the situations under which a lead agency must consult with Tribes before approving a project. It also defines what "consultation" means, specifies the steps that must be taken if a Tribe chooses to engage in the consultation process, defines "significance" with regard to tribal cultural resources under CEQA, and establishes processes for concluding the consultation process. In practice, this required consultation process gives Tribes considerable ability to influence projects.

The City thanks the commenter.

MEMORANDUM OF UNDERSTANDING REGARDING GUIDING PRINCIPLES FOR THE CITY OF CHICO CONSULTATION WITH THE MECHOOPDA INDIAN TRIBE OF CHICO RANCHERIA

WHEREAS, the City of Chico (the "City") recognizes the Mechoopda Indian Tribe of Chico Rancheria (the "Tribe") as the first people, whose ancestral lands and area of occupation encompass the City of Chico, its sphere of influence, and beyond; and

WHEREAS, the Tribe is a sovereign, federally recognized tribe whose members are honored and respected first peoples of this land; and

WHEREAS, the Tribal Council is the governing body of the Tribe, empowered to make tribal policy and carry out tribal business; and

WHEREAS, Senate Bill 18 adopted in 2004 requires the City to consult with the Tribe prior to the adoption of any amendment to the General Plan, adoption of any specific plan or prior to the designation of land as open space containing cultural places; and

WHEREAS, the City and the Tribe wish to develop a broader cooperative agreement which extends beyond that which is specified in SB 18 including consultation on all open space designations; and

WHEREAS, the City and the Tribe are committed to working with each other on a government to government basis to develop a cooperative, streamlined process for such consultation; and

WHEREAS, consultation means the meaningful and timely process to notify, discuss, and consider carefully the views of others, in a manner that is respectful of each other's cultural values and, where feasible, to seek agreement; and

WHEREAS, the City recognizes and agrees to accommodate the Tribe's need to maintain confidentiality to protect archaeological sites, traditional cultural properties, and traditional cultural resources, to the extent allowed for by law, including, but not limited to, exemption from public disclosure as set forth in SB 18 and California Government Code section 6254(r); and

WHEREAS, the City and the Tribe seek to consult and work cooperatively to protect, preserve, enhance, mitigate, and manage archaeological sites, traditional cultural properties, and traditional

The 2008 MOU between the Tribe and the City is provided as follows:

cultural resources, identified within the jurisdiction and sphere of influence of the City, whether on public or private land; and

WHEREAS, the City is committed to enabling the Tribe to access and steward their cultural resources and places by designation and utilizing open and vacant space, and by Tribal acquisition of conservation easements voluntarily conveyed where feasible.

NOW, THEREFORE, BE IT AGREED BY THE CITY AND THE TRIBE AS FOLLOWS:

The City and the Tribe shall work together to establish procedures for consultation which will provide an efficient process for that consultation with both parties committed to open, candid, respectful, timely, and effective communication; and

The Director of the Planning Services Department shall designate a staff member as a Tribal Technical Advisor for Native American consultation to advise the City departments on policy issues and provide appropriate technical information to the Tribe; and

The City and the Tribe shall endeavor to provide the resources necessary for the investigation, evaluation, monitoring, mitigation, and ongoing protection of traditional cultural properties and for the potential disposition of artifacts through the budgetary, development, and capital improvement processes; and

The City and the Tribe shall develop a cultural resources management plan, subject to funding availability, which may include a cultural resource and historic preservation component within the General Plan, and/or update the City's Best Management Practices, or appropriate standard operating procedures, whose purposes are to specify actions to be taken to protect, preserve, enhance, mitigate, and manage, or dispose of, traditional cultural properties and resources identified or impacted within the City.

THEREFORE BE IT RESOLVED, by the signatures of the representatives on the date indicated below that the City and the Tribe formally endorses and accepts this Memorandum of Understanding.

DATE: August 5, 2008

CITY OF CHICO

By: David Burkland, City Manager

MECHOOPDA INDIAN TRIBE OF CHICO RANCHERIA

By: Dennis Ramirez, Tribal Chairman

C:\DOCUME~1\lcameron\LOCALS~1\Temp\XPgrpwise\MOU, apprvd 6-17-08.doc
Page 2 of 3

By: Sandra Knight, Tribal Vice Chairperson

By: Robyn Forristel, Tribal Secretary

By: Barbara Rose, Tribal Treasurer

By: Paulita Hopper, Tribal Member-at-Large

By: Arlene Ward, Tribal Member-at-Large

By: Donna Rose, Tribal Member-at-Large

APPROVED AS TO FORM:

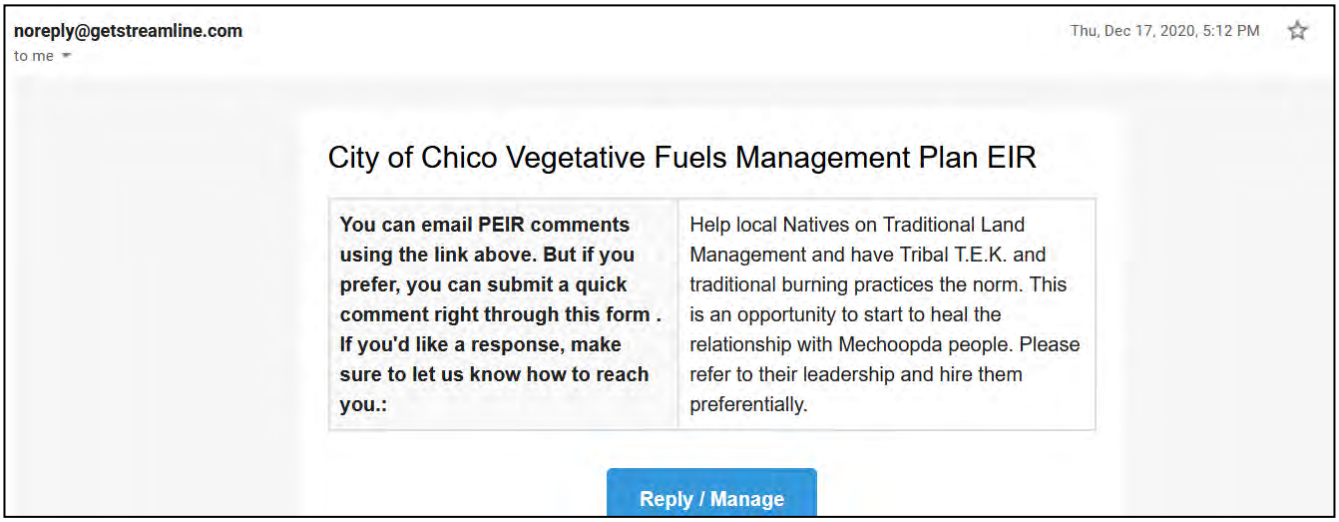
CITY OF CHICO

Lori J. Barker, City Attorney
By: Roger S. Wilson, Assistant City Attorney

MECHOOPDA INDIAN TRIBE OF CHICO RANCHERIA

Kazhe Law Group P.C.
By: Christina V. Kazhe, Tribal General Counsel

Letter B8: Anonymous 5:12 pm



noreply@getstreamline.com
to me

Thu, Dec 17, 2020, 5:12 PM

City of Chico Vegetative Fuels Management Plan EIR

You can email PEIR comments using the link above. But if you prefer, you can submit a quick comment right through this form . If you'd like a response, make sure to let us know how to reach you.:	Help local Natives on Traditional Land Management and have Tribal T.E.K. and traditional burning practices the norm. This is an opportunity to start to heal the relationship with Mechoopda people. Please refer to their leadership and hire them preferentially.

Reply / Manage

Response to Comment B8

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The commenter is also advocating for controlled burning within the City. Refer to **Master Response 2: Prescribed Burning in the Parks.**

The City thanks the commenter.

Letter B9 **Raphael DiGenova**

City of Chico Vegetative Fuels Management Plan EIR

You can email PEIR	My name is Raphael DiGenova, a first generation Chico resident of 33 years. I am an environmental volunteer and activist as well as a nursery technician for a local native plant restoration nursery. I intend to live in Chico for much longer and have very high hopes of righting the ecological damage that's been done to our parks, surrounding open spaces, and overall local ecosystem that's been caused by nearly two centuries of interruption of Indigenous land stewardship practices, overgrazing, and the cities developement of infrastructure without guidance from proper ecological authority. I want to see the use of prescribed burning within the city and in all parks and open spaces. I believe that Anny Bidwell's intentions on "gifting" the areas we call bidwell park and "protecting" them were short sighted and innaproriate, I cannot accept a gift that was taken, and I know that the health, beauty, and resources in those areas was so healthy at the time because of it's indigenous stewardship, which should be returned in any way possible as immediately as possible. The Mechoopda should govern the park and have full access to planting or removing or doing anything to it that they want as far as management. I want the diversion dam on Sandy Gulch to be removed to allow water to flow through what we call lindo channel year round again, and I want the riparian habitat and trees to be restored along its entire length so that it is properly shaded and provides continuous habitat for wildlife. I want to see mitigation and restoration of a similar nature along the seasonal creeks in the vernal pool areas north of town known as bidwell ranch, and in that area i want to ensure that cattle grazing is eliminated and replaced wirh fire regimen and i would Love to see the reintroduction of original grazing animals. I believe that all of those things done properly will reduce fuels in the most effective way possible. I also second the comments made by Ali Meders-Knight and following is a copy of what she commented: "My name is Ali Meders-Knight and I am a local Tribal member with the Mechoopda Indian Tribe. I am a traditional basket weaver and traditional practitioner of Traditional Ecological Knowledge also known as (T.E.K.). Since early 2000 I have taught local citizens about Mechoopda cultural practices within

Comment B9-1

Comment B9-2

Chico's City Parks and not only consider the plants in these city parks cultural resources, but the ecologies themselves. The relationship between Mechoopda Tribal communities and the management of our ecosystems is a well documented local historical legacy. I am submitting several comments for this PEIR for your consideration in this fuels management plan. In 2006 the City of Chico and the Mechoopda Indian Tribe of Chico Rancheria entered into a Memorandum of Understanding (MOU). This agreement was formed in compliance with California Senate Bill 18 which requires the City of Chico to consult with the Mechoopda Tribe prior to the adoption of any amendment to the General Plan, adoption of any specific plan,(in this case the VFMP). The consultation for this MOU does not require the Mechoopda Tribe to be consulted for the development of the plan but does require Tribal consultation defined as "meaningful and timely process of to notify, discuss, and consider carefully the views of others, in a manner that is respectful of each other's cultural values and where feasible, to seek agreement" before it's adoption into policy. This consultation would most likely result in agreements that would require not only Registered Professional Forester standard practices but Tribal Land Managements Agreements as well for management standards.The City's MOU Agreement with the Mechoopda Indian Tribe should be cited and included in this PEIR to further explain the process of how this VFMP is adopted into Chico's General Plan as well as included Tribal Agreements after Tribal Consultation is officially implemented. Under Section 2.5 Verbena Fields the PEIR states that the City of Chico and Mechoopda CAN develop a M.O.U for land management and the City ALREADY has an M.O.U. with the Mechoopda Indian Tribe. The M.O.U. has specific language that can address a collaborative management plan with Mechoopda through consultation. The Mechoopda Tribal Preservation Office and Office of Environmental Protection and Planning are well established agencies within the Mechoopda Tribal government that have participated in the development of Verbena Fields and have the capacity to consult on additional standards of management of "Valley Oaks", "Grasslands", or "Riparian" based on T.E.K. (Traditional Ecological Knowledge). This PEIR should include that the M.O.U does exist and direct the City to consult with Mechoopda and appoint a Tribal Technical Advisor as stated in the M.O.U to facilitate an Agreement. Additionally Assembly Bill 52 (AB52) states that California Tribes have rights to manage their own cultural resources within their designated territory and this includes culturally significant plants and ecosystems. The contracted work on Mechoopda Culturally significant sites should be designated as sole source contracting to Mechoopda if the Tribe shows the capacity to fulfill the contractual requirements for the scope of work. The only way to determine if the Mechoopda Tribe has capacity for some or all land management contracts is to consult with the Mechoopda Tribe and form an agreement. Thank you for considering my comments for the City of Chico's Vegetative Fuels Management Plan of Parks, Greenways, and Open Spaces"

Response to Comment B9-1

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K. Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.** The commenter is also advocating for increased rights of Mechoopda people to take actions in Chico parklands that members of the public in general are not currently allowed to do.

These rights could be negotiated through the tribal consultation process. For example, the PEIR stipulates that the project must be described in enough detail during tribal consultation that the Mechoopda Tribe could decide whether members wanted to access and collect some or all of the vegetation to be removed. The PEIR also acknowledges that sites of cultural significance, once designated, can be temporarily closed to the public during Mechoopda cultural events.

Response to Comment B9-2

The commenter requests the diversion structures near Five Mile be removed to allow year-round flow to Lindo Channel.

This action is not contemplated in the PEIR and would not be an action the City could take on its own. The structures were built in 1961 by the U.S. Army Corps of Engineers and are maintained by the CA Department of Water Resources in cooperation with the County of Butte. Before construction of the diversion structure, it is not clear whether Sandy Gulch actually contained water year-round (GEM 2001). Either way, if the diversion structures were to be removed, it would probably require an additional EIR to analyze the possible downstream effects on migrating salmon and other species, as well as any potential flooding impacts using recent climate projections which were not available in 1961 when the structures were built.

The City of Chico Public Works Department did not build these diversion structures and is not necessarily automatically opposed to their alteration or removal, but a consensus from CDFW, the U.S. Army Corps of Engineers, the CA Department of Water Resources, the City, the County, and the Mechoopda Tribe would likely be required before removal could be initiated.

T*he commenter also advocates for restoration along the seasonal creeks in the Bidwell Ranch area.*

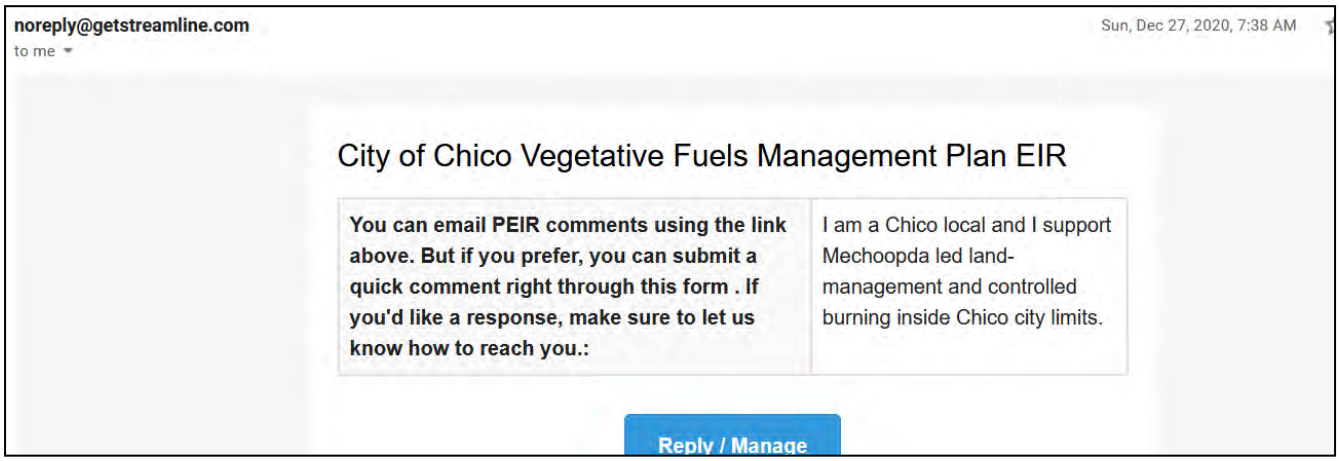
These drainages do not have any upstream diversion structures reducing their flow. If anything, the Sycamore Diversion Channel increases the flow of Sycamore Creek during flooding events as it diverts the flow of Big Chico Creek away from downtown Chico. The Bidwell Ranch lands are expected to be managed as part of the Butte Habitat Conservation Plan when it is approved. If this occurred, a primary management objective for these lands would continue to be protection and promotion of Butte County Meadowfoam (BCM, or *Limnanthes floccosa ssp. californica*), an endangered species which has suitable habitat and mapped occurrences in Bidwell Ranch. Prescribed cattle grazing is currently thought to be beneficial to Butte County Meadowfoam and several other vernal pool plants because it breaks up annual grass thatch that can limit the growth of vernal pool plants. Prescribed cattle grazing is used as a maintenance tactic in many or most BCM preserves. Cattle are not the only grazers, and grazing is not the only disturbance, that can benefit BCM, but cattle grazing is a relatively accessible and low-barrier treatment to break up thatch. In the future, the City could, if it chooses tier off the PEIR to develop prescribed fire projects in Bidwell Ranch as long as it can do so while meeting all SPRs listed in the PEIR (such as consultation with the USFWS to establish no adverse effects on endangered species).

The commenter is also advocating for controlled burning within the City.

Refer to **Master Response 2**: **Prescribed Burning in the Parks.**

The City thanks the commenter.

Letter B10: Anonymous 7:38 am



Response to Comment B10

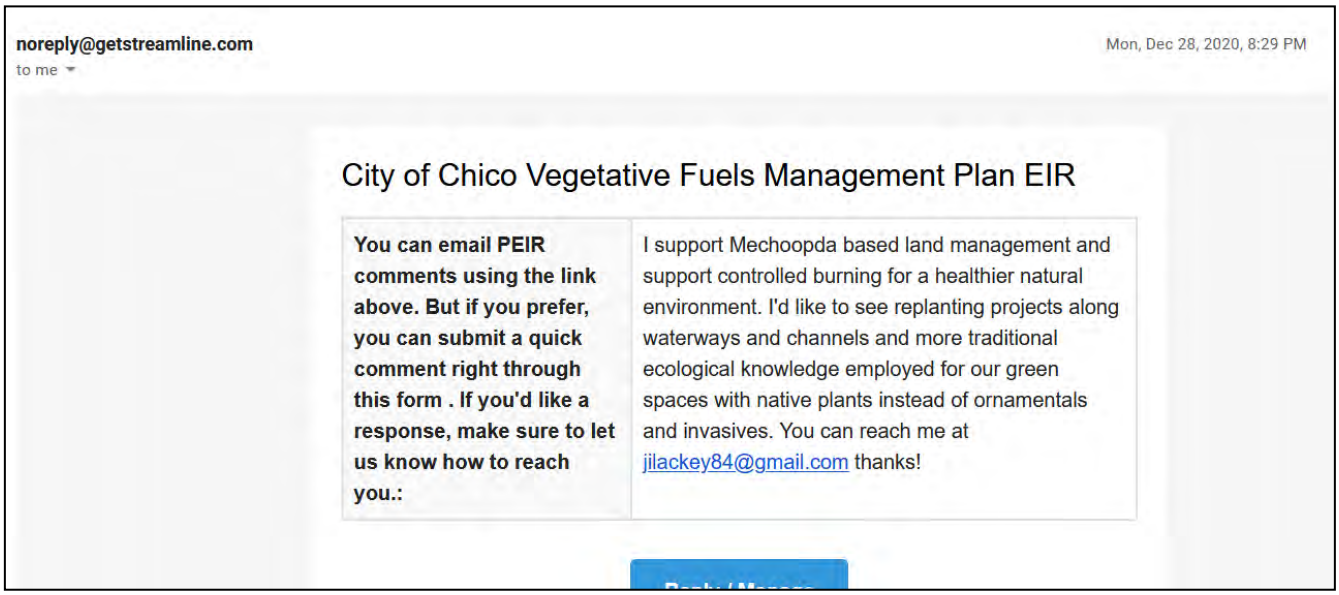
The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K.

Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.**

The commenter is also advocating for controlled burning within the City.

Refer to **Master Response 2: Prescribed Burning in the Parks.** The City thanks the commenter.

Letter B11: jilackey84



noreply@getstreamline.com
to me

Mon, Dec 28, 2020, 8:29 PM

City of Chico Vegetative Fuels Management Plan EIR

You can email PEIR comments using the link above. But if you prefer, you can submit a quick comment right through this form . If you'd like a response, make sure to let us know how to reach you.:	I support Mechoopda based land management and support controlled burning for a healthier natural environment. I'd like to see replanting projects along waterways and channels and more traditional ecological knowledge employed for our green spaces with native plants instead of ornamentals and invasives. You can reach me at jilackey84@gmail.com thanks!

Response to Comment B11

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K.

Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.**

The commenter is also advocating for controlled burning within the City.

Refer to **Master Response 2: Prescribed Burning in the Parks.**

The comment also expresses a preference for native plants over ornamentals and invasives.

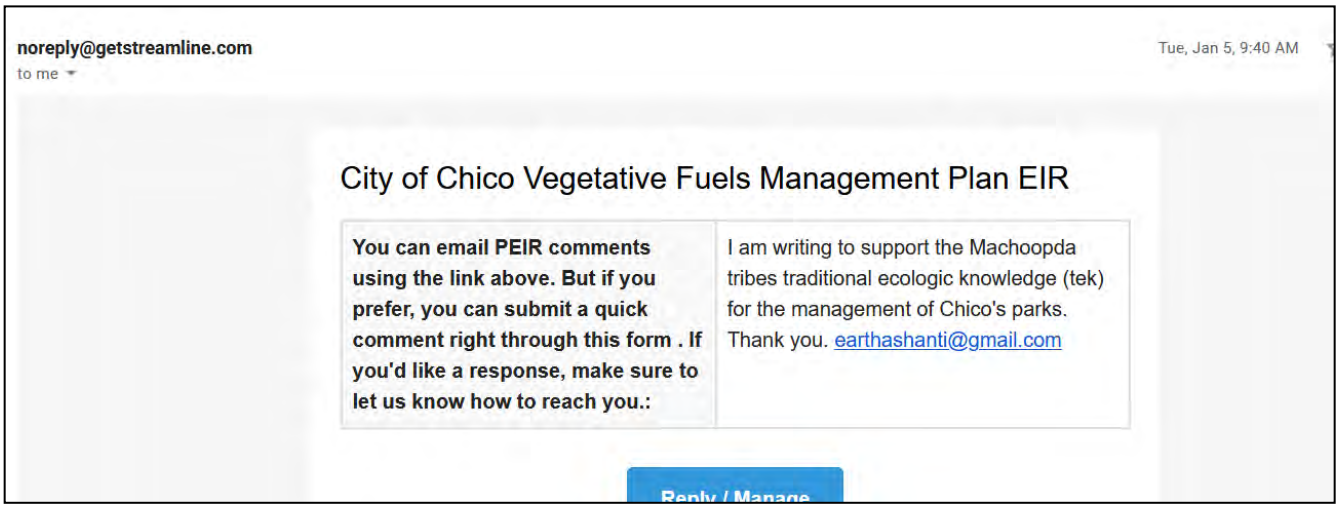
The VFMP and PEIR specifies that when vegetation needs to be removed, invasives will be removed first (in an order of priority from most noxious/worst fire hazard to most benign) before any native plants are removed as a last resort. While some City buildings may include non-native plants in street landscaping, the Parks Division does not plant non-native species in the parks, with the possible exception of turf maintenance on lawns and playing fields.

The commenter also requests replanting projects along waterways.

Replanting is not a large part of the VFMP because the VFMP is generally designed to either reduce vegetation density or leave it the way it is if it is already within fuel loading standards. However, reseeding projects could still be tiered off the PEIR. For example, reseeding of native grasses and/or forbs may be an effective way to prevent re-infestation by invasive plants after invasive plant removal projects, and can easily be incorporated into any invasive removal plan. Planting of willow and other fire-safe riparian vegetation is a required follow-up step to the Arundo removal initiative described in the VFMP.

The City thanks the commenter.

Letter B12: Eartha Shanti



noreply@getstreamline.com
to me
Tue, Jan 5, 9:40 AM

City of Chico Vegetative Fuels Management Plan EIR

You can email PEIR comments using the link above. But if you prefer, you can submit a quick comment right through this form . If you'd like a response, make sure to let us know how to reach you.:	I am writing to support the Machoopda tribes traditional ecologic knowledge (tek) for the management of Chico's parks. Thank you. earthashanti@gmail.com

Reply / Manage

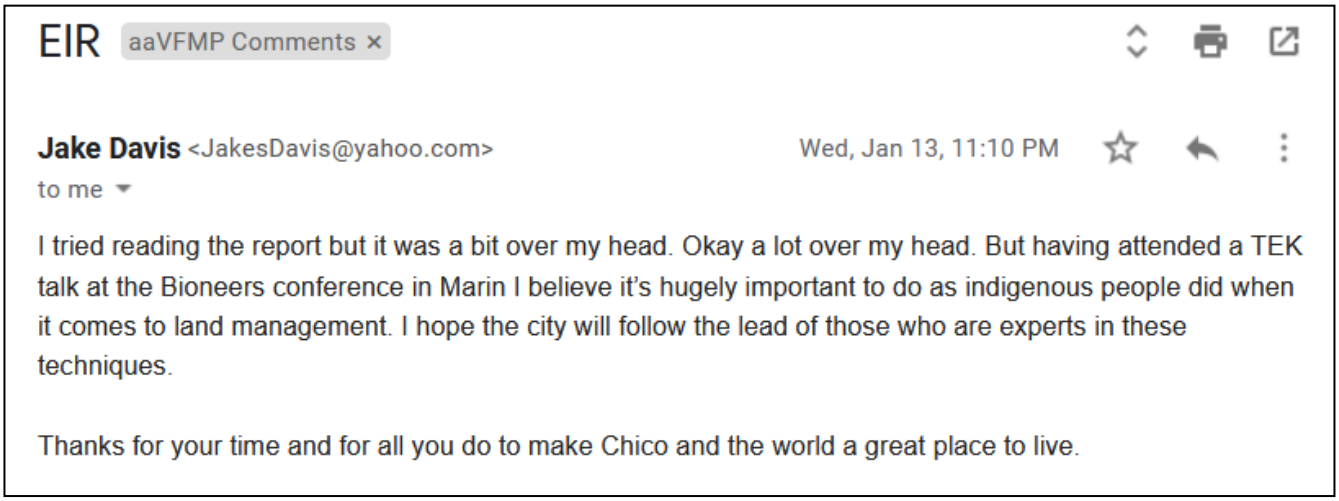
Response to Comment B12

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K.

Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.**

The City thanks the commenter.

Letter B13: Jake Davis



EIR aaVFMP Comments ×

Jake Davis <JakesDavis@yahoo.com> Wed, Jan 13, 11:10 PM
to me

I tried reading the report but it was a bit over my head. Okay a lot over my head. But having attended a TEK talk at the Bioneers conference in Marin I believe it's hugely important to do as indigenous people did when it comes to land management. I hope the city will follow the lead of those who are experts in these techniques.

Thanks for your time and for all you do to make Chico and the world a great place to live.

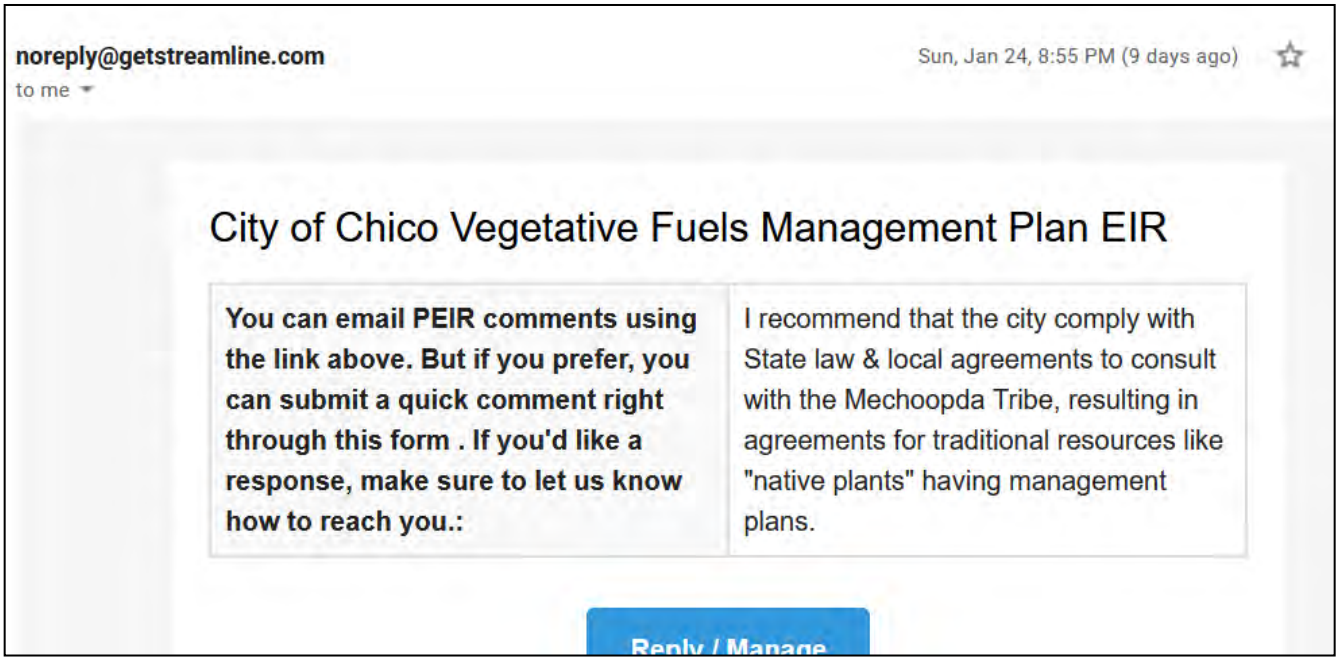
Response to Comment B13

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K.

Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.**

The City thanks the commenter.

Letter B14: Anonymous 8:55 pm



Response to Comment B14

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K.

Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.**

The commenter also specifies that consultation should result in agreements with regard to management plans for native plants.

The City agrees that one main goal of tribal consultation is the further, collaborative, refinement of the VFMP's existing management guidance which covers native vegetation communities and some specific native trees.

The City thanks the commenter.

Letter B15: Dr. Sarah M. Pike

From: Sarah M Pike <SPike@csuchico.edu>
Sent: Saturday, January 30, 2021 2:34 PM
To: Park Public Comments <parkpubliccomments@Chicoca.gov>
Subject: PEIR Draft Vegetative Fuels Management Plan

To Whom It May Concern,

For the past few weeks, I have been working as a volunteer tending the land at Verbena Fields with Ali Meders-Knight, CSUC and Butte College students, and various community members. I would urge the city to work closely with the Mechoopda and find ways to incorporate Traditional Ecological Knowledge (TEK) in fuels management plans for our city parks. This is a great opportunity for closer relationships between the tribe and the city, and we can all benefit from the thousands of years of ecological knowledge that Native Californians have developed to live on this landscape, and especially to live with fire (see M. Kat Anderson, *Tending the Wild: Native American Knowledge and the Management of California's Natural Resources*, University of California Press, 2005). This is also an opportunity to get students from CAVE and various classes on sustainability and environmental studies working with the City of Chico to take care of our parks

Thanks for your consideration,

Sarah

Dr. Sarah M. Pike
Professor of Comparative Religion and Humanities
CSU, Chico
Spike@csuchico.edu

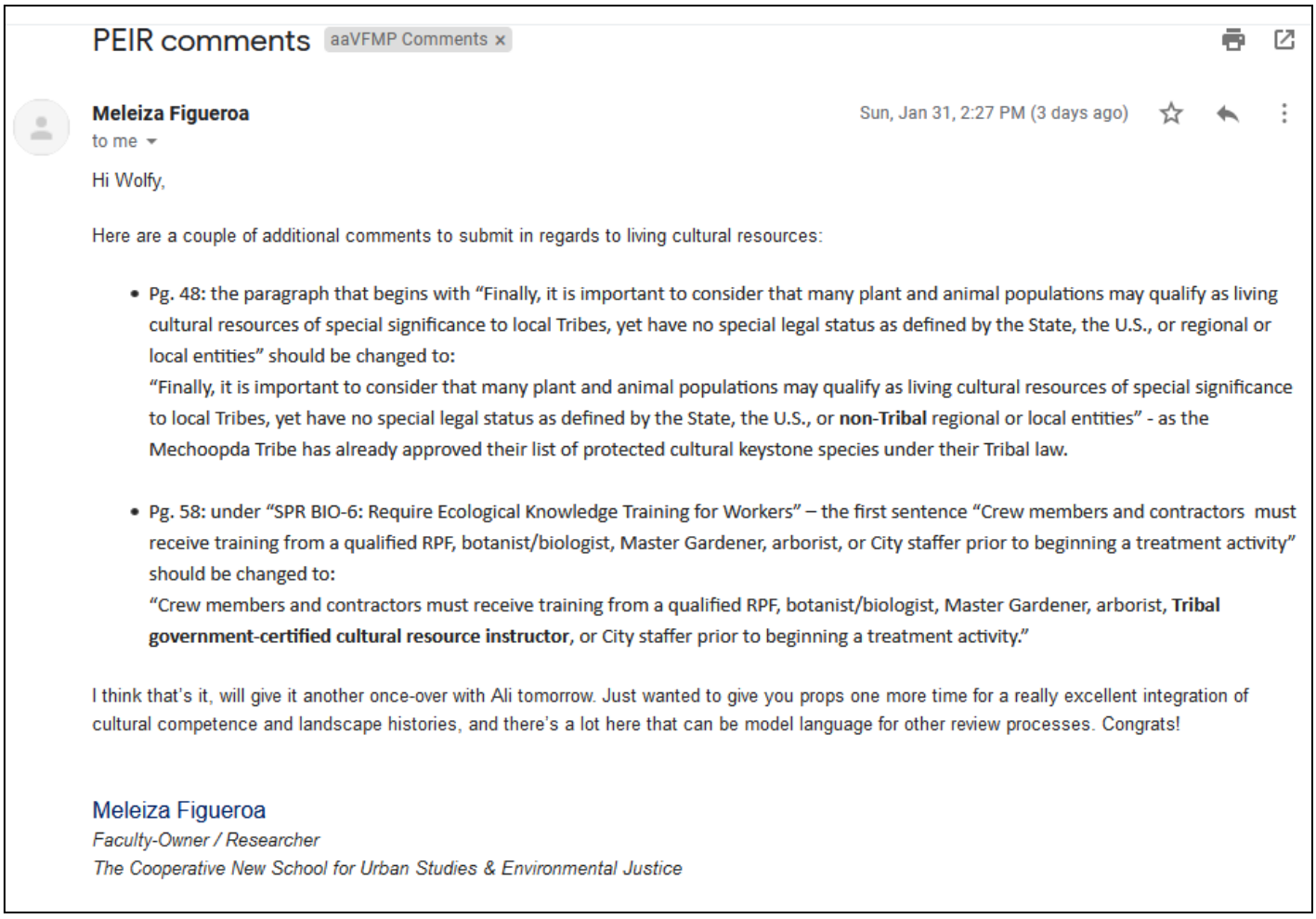
Response to Comment B15

The commenter is advocating for Mechoopda-led land management and incorporation of T.E.K.

Refer to **Master Response 1: Mechoopda-Led Land Management and Incorporation of T.E.K. into Vegetation Management.**

The City thanks the commenter.

Letter B16: Meleiza Figueroa



PEIR comments aaVFMP Comments ×

Meleiza Figueroa Sun, Jan 31, 2:27 PM (3 days ago)
to me

Hi Wolfy,

Here are a couple of additional comments to submit in regards to living cultural resources:

- Pg. 48: the paragraph that begins with "Finally, it is important to consider that many plant and animal populations may qualify as living cultural resources of special significance to local Tribes, yet have no special legal status as defined by the State, the U.S., or regional or local entities" should be changed to:
  "Finally, it is important to consider that many plant and animal populations may qualify as living cultural resources of special significance to local Tribes, yet have no special legal status as defined by the State, the U.S., or **non-Tribal** regional or local entities" - as the Mechoopda Tribe has already approved their list of protected cultural keystone species under their Tribal law.

- Pg. 58: under "SPR BIO-6: Require Ecological Knowledge Training for Workers" – the first sentence "Crew members and contractors must receive training from a qualified RPF, botanist/biologist, Master Gardener, arborist, or City staffer prior to beginning a treatment activity" should be changed to:
  "Crew members and contractors must receive training from a qualified RPF, botanist/biologist, Master Gardener, arborist, **Tribal government-certified cultural resource instructor**, or City staffer prior to beginning a treatment activity."

I think that's it, will give it another once-over with Ali tomorrow. Just wanted to give you props one more time for a really excellent integration of cultural competence and landscape histories, and there's a lot here that can be model language for other review processes. Congrats!

Meleiza Figueroa
Faculty-Owner / Researcher
The Cooperative New School for Urban Studies & Environmental Justice

Response to Comment B16

The commenter requests the language "regional or local entities" on page 48 of the PEIR (section 4.4.1, paragraph 4) be revised to "non-Tribal regional or local entities."

The change has been made.

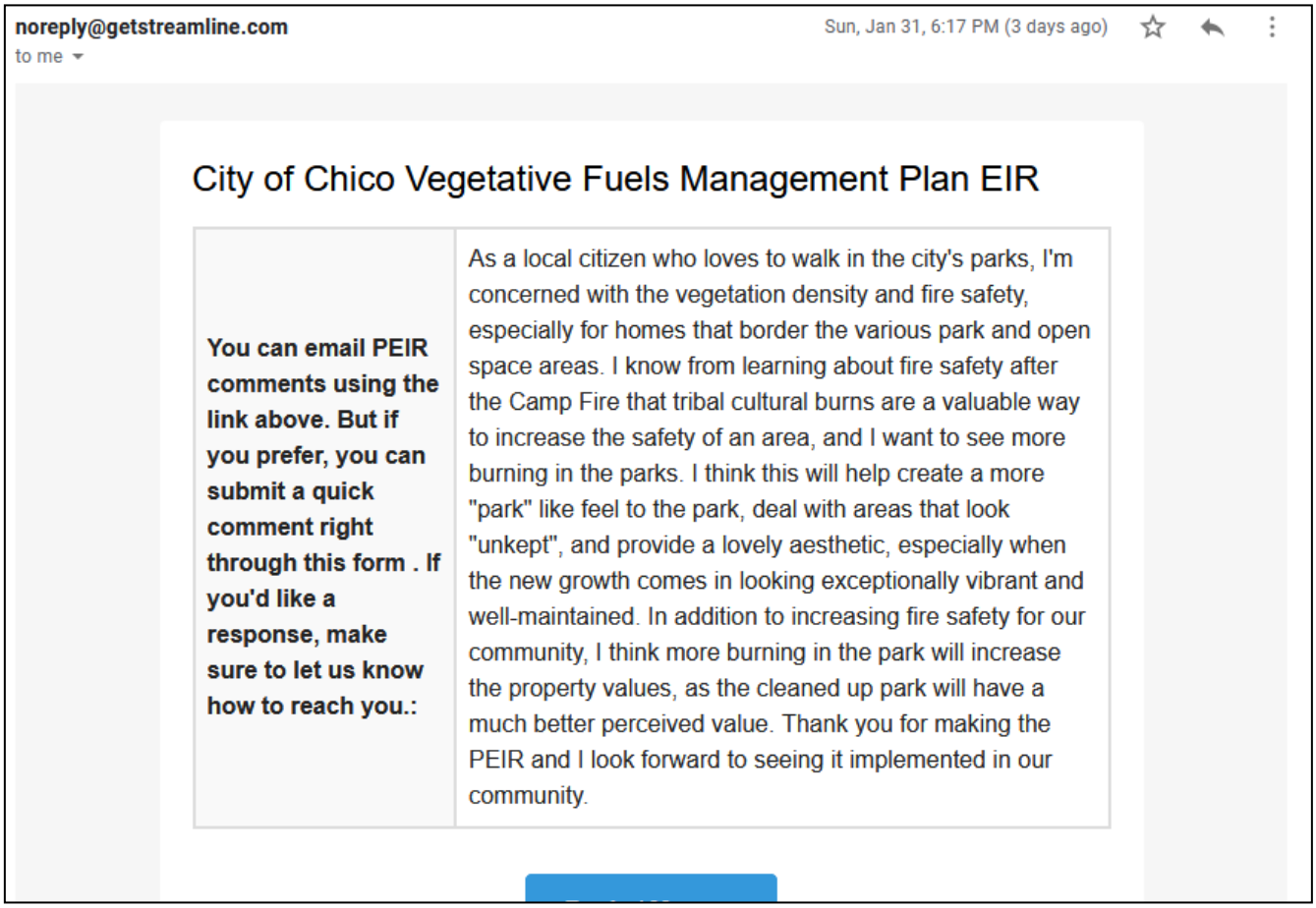
The commenter also requests the list of qualified ecological knowledge instructors on page 58 of the PEIR (section 4.4.2, SPR BIO-6) be revised to include "Tribal government-certified cultural resource instructor."

The section has been updated as follows:

> "Crew members and contractors must receive training from a qualified RPF, specialist, botanist/biologist, Master Gardener, arborist, Tribal government-certified cultural resource instructor, or qualified City staffer prior to beginning a treatment activity."

The City thanks the commenter.

Letter B17: Anonymous 6:17 pm



noreply@getstreamline.com
to me
Sun, Jan 31, 6:17 PM (3 days ago)

City of Chico Vegetative Fuels Management Plan EIR

You can email PEIR comments using the link above. But if you prefer, you can submit a quick comment right through this form . If you'd like a response, make sure to let us know how to reach you.:	As a local citizen who loves to walk in the city's parks, I'm concerned with the vegetation density and fire safety, especially for homes that border the various park and open space areas. I know from learning about fire safety after the Camp Fire that tribal cultural burns are a valuable way to increase the safety of an area, and I want to see more burning in the parks. I think this will help create a more "park" like feel to the park, deal with areas that look "unkept", and provide a lovely aesthetic, especially when the new growth comes in looking exceptionally vibrant and well-maintained. In addition to increasing fire safety for our community, I think more burning in the park will increase the property values, as the cleaned up park will have a much better perceived value. Thank you for making the PEIR and I look forward to seeing it implemented in our community.

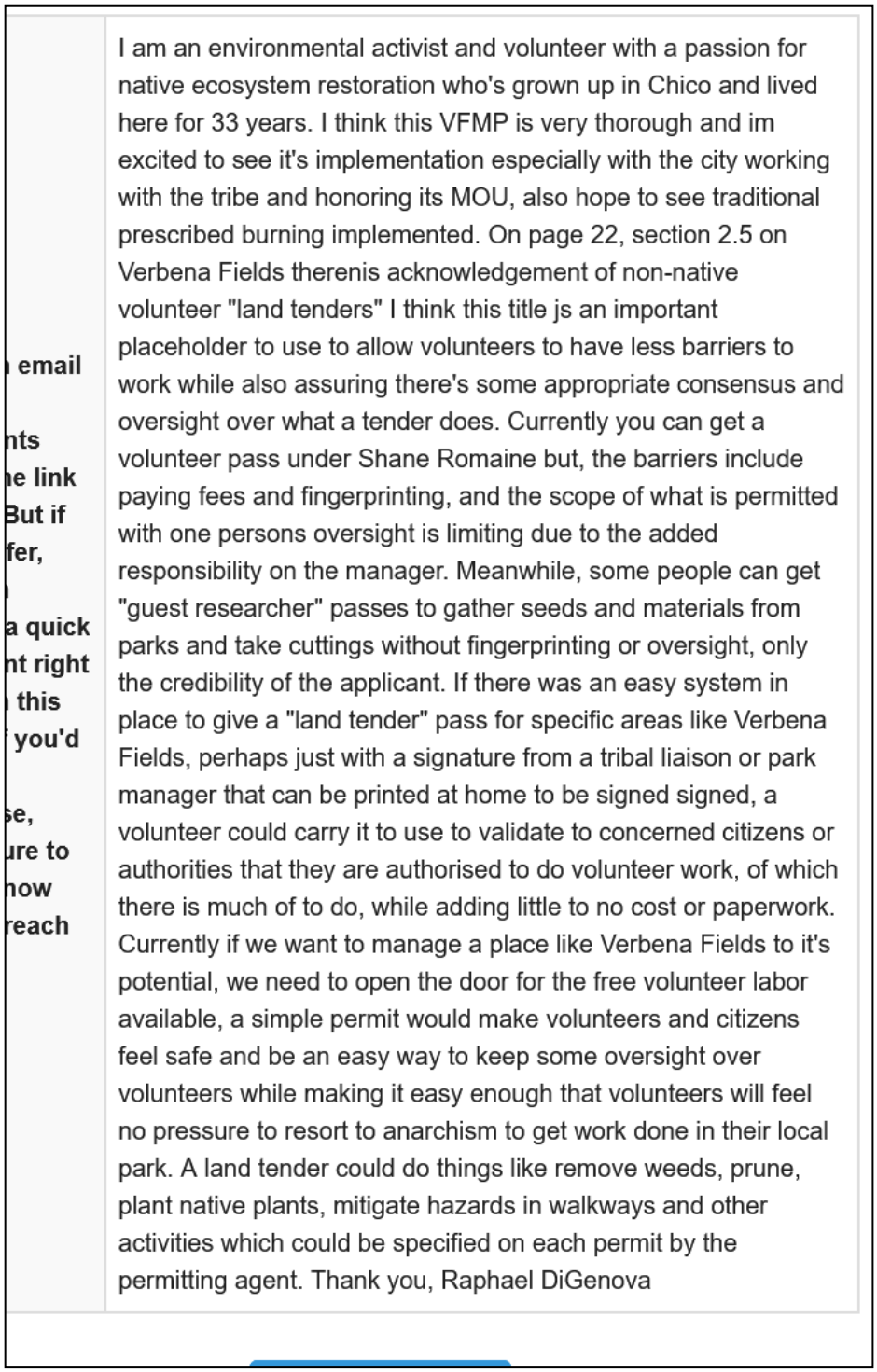
Response to Comment B17

The commenter is advocating for controlled burning within the City.

Refer to **Master Response 2: Prescribed Burning in the Parks.**

The City thanks the commenter.

Letter B18: Raphael DiGenova



I am an environmental activist and volunteer with a passion for native ecosystem restoration who's grown up in Chico and lived here for 33 years. I think this VFMP is very thorough and im excited to see it's implementation especially with the city working with the tribe and honoring its MOU, also hope to see traditional prescribed burning implemented. On page 22, section 2.5 on Verbena Fields therenis acknowledgement of non-native volunteer "land tenders" I think this title js an important placeholder to use to allow volunteers to have less barriers to work while also assuring there's some appropriate consensus and oversight over what a tender does. Currently you can get a volunteer pass under Shane Romaine but, the barriers include paying fees and fingerprinting, and the scope of what is permitted with one persons oversight is limiting due to the added responsibility on the manager. Meanwhile, some people can get "guest researcher" passes to gather seeds and materials from parks and take cuttings without fingerprinting or oversight, only the credibility of the applicant. If there was an easy system in place to give a "land tender" pass for specific areas like Verbena Fields, perhaps just with a signature from a tribal liaison or park manager that can be printed at home to be signed signed, a volunteer could carry it to use to validate to concerned citizens or authorities that they are authorised to do volunteer work, of which there is much of to do, while adding little to no cost or paperwork. Currently if we want to manage a place like Verbena Fields to it's potential, we need to open the door for the free volunteer labor available, a simple permit would make volunteers and citizens feel safe and be an easy way to keep some oversight over volunteers while making it easy enough that volunteers will feel no pressure to resort to anarchism to get work done in their local park. A land tender could do things like remove weeds, prune, plant native plants, mitigate hazards in walkways and other activities which could be specified on each permit by the permitting agent. Thank you, Raphael DiGenova

Comment B18-1

Comment B18-2

Response to Comment B18-1

The commenter is advocating for controlled burning within the City, in this case Tribal-style cultural burning.

Refer to **Master Response 2: Prescribed Burning in the Parks.**

Response to Comment B18-2

The commenter observes that volunteers are crucial to getting work done on Chico parklands and

discusses some obstacles to growing the volunteer base. The commenter observes that the City's policy of requiring fingerprinting for parks volunteers could be a barrier to some willing volunteers and seems inequitable given that people with "guest researcher" status do not have to be fingerprinted. Guest researchers fill out a Special Use Permit application which is approved or not by the Natural Resources Manager. Casual volunteers working less than 4 hours/month can work without any fingerprinting or background check, under the guidance of Parks staff or a PALS volunteer. Volunteers who work regularly (more than 4 hrs./month) are asked to become PALS (Partners, Ambassadors, Leaders, and Stewards) volunteers. PALS volunteers must complete a free fingerprinting and criminal background check to screen for some violent offenses. There are no fees associated with becoming a PALS volunteer.

The commenter also observes that requiring volunteers to work under the oversight of a manager is limiting because the manager's time is limited. However, when volunteers do work, they have been trained by managers to do when managers are not present, they sometimes encounter challenges from citizens or authorities who assume the volunteers are not supposed to be in the parks. The commenter suggests that volunteers be issued a simple pass they can show to concerned citizens or authorities proving they have received training and are authorized to do a set of tasks in the parks.

The land-tending activity the commenter describes falls under the "stewards" description and would be part of the PALS volunteer description. PALS membership comes with an ID and a special vest. Right now, there are no plans to create a different tier of volunteer opportunity between casual volunteering and the PALS volunteers.

The City thanks the commenter.

RESPONSES TO PUBLIC COMMENTS AT THE BIDWELL PARK & PLAYGROUND COMISSION MEETINGS

Comment C1: Ali Meders-Knight

So, my public comment is in 2006 the Mechoopda Tribe received a letter which was request-- it was a draft MOU that was sent by the City's attorney, Thomas Lando. And it was basically the City's being in compliance with SB 18, Senate Bill 18. And the senate bill is basically consultation for between the Tribe and the City of Chico for cultural resources. And I'm recently working with the Tribe developing T.E.K., Traditional Ecological Knowledge, certifications, and the Tribe is working that we will have a list of living cultural resources, which is a list of plants. So, we're looking at blue oaks, different riparian areas; we're going to be considering those cultural resources. And so, I just want to also comment that through this traditional ecological knowledge, TEK, certification, we would be looking at cultural risk assessments to our cultural resources or plants. And one of the risks is not having fire. And so, it's going to be an interesting reply, but I want to make a public comment that the lack of fire is a cultural risk to the local tribe, because our cultural resources, the native plants, are all adapted to fie. Have been adapted to fire for thousands of years. So, every native plant in California is adapted to fire, guaranteed. And then our landscapes, in order to keep our cultural resources, we're going to need to have fire, on the landscape and on these areas. And so, I think that the tribal consultation, that is required under SB 18 is going to need some, well it's going to probably create a more elaborate MOU with the tribe based on certain areas and certain plants. So, for instance, Verbena Fields is a City park area that would be under, basically, under jurisdiction so there is already an ongoing relationship with that park just to use for example. So, I just wanted to put that on there and that in this the outreach the Tribe hopefully to have traditional burning brought back to the land, for fuels management, would be a positive outcome as well as a workforce development initiative between the City and the Tribe.

Thank you, so I just wanted to make that one public comment that the consultation is already state-mandated under SB 18 and AB 52. The also, the MOU between the City and the Tribe is an agreement that's local that needs to be looked at if it hasn't been but it's basically it's just the same guidelines under SB 18 which is State law. Thank you.

Response to Comment C1

The City agrees that development of a more elaborate agreement or set of agreements with the Tribe is a reasonably foreseeable future development based on the VFMP PEIR and AB 52. As stated elsewhere, SB 18 is not relevant to the VFMP PEIR process, but AB 52 is. The VFMP PEIR establishes the necessity of tribal consultation on each future activity under its scope. See also response to comment B7, above. The City thanks the commenter.

Comment C2: Woody Elliott

OK, I just would like to follow up on what Park Commissioner Lise Smith-Peters mentioned and this is more of a question than a comment. How is the commencement of any of the seven key and future projects to be made publicly known, in advance, assuming that they are determined, they are determined by staff to conform to this final EIR and require no further environmental determination, in other words the cat ex neg dec or EIR, after completion of the consistency checklist? Such advance knowledge is necessary for the public and the Bidwell Park and Playground Commission to review the validity of the consistency determination and if the projects have no significant adverse environmental effects based on subsequent detailed project descriptions and field surveys, which are mandated in the EIR. This ability for public review is a basic tenant of CEQA. Thank you.

Response to Comment C2

Please see **Master Response 4: Future Activity Workflow**. The City thanks the commenter.

Comment C3: Aaron Haar, Bidwell Park and Playground Commissioner

Thank you, Mr. Elliott and Commissioner Smith Peters... How is the public going to be notified, and if we're coming to… it almost sounded like we said we were going to notify them after the project, after the streamlined project was done. So if the projects fit the category, you know, what's the process for informing the public, and if the Commission needs to be involved, if there's going to be, you know, where's our regulation to make sure that the project's going to fit our community and that it's not going to have significant damage to or harm the environment. So, it's almost like a trust, a, we've got to trust the process, and you know I guarantee there's going to be people who aren't going to trust that.

Response to comment C3

For more about public and BPPC notification and review, please see **Master Response 4: Future Activity Workflow.** Through thorough review and revisions of the VFMP and its accompanying PEIR, the Commission has guided the VFMP's consistency with community standards and environmental integrity. The City thanks the Commissioner Haar's comments.

Comment C4: BPPC Commissioner Lise Smith-Peters

On page 16 of the PEIR, I just wanted to make a note that all of the management plans that we have for our areas are pretty outdated and I just wanted to make a note of that. That the reality is that all of these plans are going to have to be revisited, site-visited, and it's nice to say we have a plan for an area, like Comanche Creek or Bidwell Ranch etc., which Bidwell Ranch is probably exactly the same as when the plan was done, but the reality is that all of these need to be outdated. Just a comment, which is what we're doing. **[comment C4-1]**

If you go to page 26, I just make a note that each of the projects need a project consistency checklist. And also, I made note that I really would like these plans to come to maybe the Natural Resource Committee if not the full Parks Commission for review. **[comment C4-2]**

So once again on page 28 under 2.5 Implementation, I just, once again it says, "Implementation of all projects and activities is contingent on funding from City budgets or external grant sources" and on direction from the Bidwell Park and Playground Commission. So, it's here in the EIR and then if you skip down to the very last sentence once again it says BPPC direction. So, I think those are important points. Guess what I did all weekend? **[comment C4-3]**

And on page 33 in the very first paragraph, it's like the third sentence I think, 'The plan will be implemented through site-specific work plans for each future activity developed using the project consistency checklist. I would love to see the site-specific work plans. **[comment C4-4]**

On page 34, the fourth paragraph, it talks about sightlines and elevation of the vegetation, and I think it actually talks about eye level, I wanted to ask about that. Is that --If you elevate everything up to sight level, or eye level, is that like trimming the branches on a tree, do you all think that will stop a fire? Is that the thought process? It's talked about a lot in the vegetation management plan. And I've walked through Lower Park where the CCCs have been doing work and there are some very small trees that have just been nipped, the tree limbs, and it doesn't make a lot of sense. So, I do, I would like to make

sure we do discuss that when we discuss the full plan, the final, final. **[comment C4-5]**

On page 54 and in some other locations in this EIR, it talks about the project proponent? This is under BIO-1, Review and Survey Project-Specific Biological Resources? Says in that first sentence, "The project proponent will require a qualified RPF (which is a Registered Professional Forester) or biologist to conduct a data review and reconnaissance-level survey prior to treatment"? I really want to make sure that we abide by that. I think it's important to have professional eyes on these projects. **[comment C4-6]**

And then under, on page 58, on SPR-BIO-6, "Require ecological knowledge training for workers: Crew members and contractors must receive training from a qualified RPF, botanist/biologist, Master Gardener, arborist," and it says, "or City staffer"? And I would like to put the word "qualified" between "city" and "staffer" so it would say "city qualified – well, it should be "qualified city staffer" – "prior to the beginning of treatment activity." And that would be someone who would have knowledge of the plant species and the techniques that are needed to either remove or the, whatever the treatment's going to be. **[comment C4-7]**

Are we able to talk about the appendices? --This is just, this is actually the draft fuel management plan, appendix B, page 72? The lower park thinning project, which is the one that I kept lobbying for? Um, two three four, the fourth section, where it says "reduce ladder fuels, especially invasive plum, blackberry, walnut—" I hope that when this is really fleshed out into a real work plan that there will be specifics? Blackberry, if you removed all the blackberry, um? It would just open up the whole floor. And then people would be all over the place. So, I'm real concerned about it saying blackberry in there. But they're so many hackberry and hawthorn and other invasive species that I think are much more important so that's been changed quite a bit from what I had submitted. **[comment C4-8]**

And then, I'm getting to the end guys, I promise. I had a, uh oh there's no page number on this, it's in the next appendix, it's the second page with text of appendix C. And it's SPR-BIO-2, Surveyor Qualifications? Sorry it's the next segment, SPR-BIO-3, Integrate Early Detection-Rapid Response into Reconnaissance Level surveys? In the middle of that paragraph, it says "this rubric is found in Section 3-7 of this programmatic EIR? Where is that section three through seven? I went back here, in the EIR and could not find – I could find 3 but I could not find, I couldn't even find a through 7. So, am I looking in the wrong place or what?
[comment C4-9]

Now you know how microscopic level I got! But that's all I've got. I'll read back through it maybe this weekend. It's important though. I appreciate, everybody, your work on it.

Response to Comment C4-1

The comment is noted. The passage in question is not intended to assert that all the listed plans are adequate or up-to date, just to inventory all the plans for readers' reference. The VFMP was written with the intent of not contradicting any existing plan, which is why it seems open-ended in some topical areas (to allow site-specific flexibility). The VFMP PEIR should provide a CEQA-compliant framework for updating many or all outdated plans without necessarily requiring an additional CEQA document for each plan.

Response to Comment C4-2

The comment is noted.

Response to Comment C4-3
The comment is noted.

Response to Comment C4-4
The comment is noted; for more on project-specific work plan review, please see **Master Response 4: Future Activity Workflow.**

Response to Comment C4-5
No, removing lower limbs from trees is not expected to stop a fire. However, removing lower limbs and ladder fuels can alter fire behavior in a way that makes it easier to suppress, reduces large tree mortality, reduces flame length, improves firefighter safety, improves fire effects, or meets a host of other objectives. Raising sightlines is a result of removing ladder fuels, not a prescription in itself, even though it is commonly informally used in place of the prescription "remove ladder fuels to a height of six to eight feet."

The work done by the CCC crew in Lower Park was not part of the VFMP or authorized using the VFMP PEIR. **SPR-BIO-6** (providing ecological training before work commences) and the VFMP thinning guidelines are designed to avoid undesirable outcomes such as what the commenter is describing.

Response to Comment C4-6
The commenter approves of SPR-BIO-1. The comment is noted.

Response to Comment C4-7
The commenter requests a minor change to SPR-BIO-6 to add the word "qualified" before "city staffer". The change has been made.

Response to Comment C4-8
The commenter opposes removing all the invasive blackberry because that would make the park too accessible to people.

The comment is noted.

T*he commenter remarks that the project description is not exactly what she had suggested for that area.*

The project description was developed by a fire behavior expert working alongside a Mechoopda Tribe environmental technician and was based on input by Smith-Peters and other citizens, site visits, ethnobotanical knowledge, and a wildfire risk analysis.

Response to Comment C4-9
Shortly before PEIR release, the information in section 3-7 was all moved into an appendix, Appendix E. Section 3-7 was then deleted. Due to consultant error, references to "Section 3-7" in SPR-BIO-4 were not updated. The City regrets the error. Ms. Smith-Peters was notified of this the following day so she could meaningfully review the rubric in question if she chose. The error has been corrected in the final PEIR.

The City thanks Commissioner Smith-Peters for her comments.

3 REVISIONS TO THE DRAFT PEIR AND VFMP

REVISIONS TO TEXT OF DRAFT PEIR

The following section lists all revisions to the text of the draft PEIR. All revisions clarified, amplified, or made minor modifications to the PEIR. No revisions added new significant information that would require PEIR recirculation. The CEQA Guidelines (§15088.5(a)) define such "significant information" as information that changes the draft PEIR "in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the City declines to implement.

Additions or insertions to the text of the draft PEIR are indicated with underlined text. Deletions from the text of the draft PEIR are indicated with ~~strikethrough text~~.

The table of contents is revised as follows:

The table of acronyms is revised as follows:

i. Acronyms and special terms

~~1.1 Abbreviations and special terms~~

Acronym	Meaning
AUM	Animal Unit-Month, a stocking metric during grazing activities
BCAQMD	Butte County Air Quality Management District
BCCER	Big Chico Creek Ecological Reserve
DEIR	Draft EIR
DPR	(California) Ddepartment of Pesticide Regulation
	return interval and its modern-day fire return interval).
HCP	Habitat Conservation Plan
IS	Initial Study (also known as "the Appendix G checklist," a type of preliminary CEQA document that sorts out insignificant from potentially significant impacts
	and also to supervise others' applications and operate a pest control business
RDM	Residual Dry Matter, a measure of how much forage remains in a paddock after grazing activities
RPA	Registered Professional Archaeologist
RPF	Registered Professional Forester
RWQCB	Regional Water Quality Control Boards, the group of regional agencies responsible for implementing the Clean Water Act in California. (Chico is in the jurisdiction of the Central Valley RWQCB.)
PEIR	Programmatic EIR
TEK	Traditional Ecological Knowledge
TMDL	Total Maximum Daily Load, an allowable level of sedimentation or other pollution
Units	Unless otherwise noted, "units" means the discrete bounded areas in which a type of work is to be done. A project can consist of a single unit or may consist of multiple units. If a project has multiple units, they may be spread out in space or time, and/or they may differ in prescription (such as when a south-facing hillslope is thinned to a different standard than the north-facing slope.)
USACE	U.S. Army Corps of Engineers

Pages 2-3 (1.1, Background Information) are revised as follows:

Objectives and contents of the Plan ~~The objective of the Plan is to establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface; reduce the negative effects of parkland fires on structures, lives and natural resources; and create conditions under which fire, when it does occur, can have beneficial effects in Chico's parkland ecosystems.~~

The goals and objectives of the Plan are as follows:

Goal 1. Minimize fire risk while protecting ecological values

Objective 1.1 Identify and characterize the City's existing high fire hazard areas, and present policies and management actions to reduce parkland fire hazards and impacts in each of the City's five main vegetation communities.

Objective 1.2 Reduce fire hazard to homes, businesses, and natural resources while continuing to manage natural parks (e.g. Bidwell, Verbena Fields, and the others listed in VFMP sections 2.1-2.5) for natural values, while managing other parklands for their respective primary management objectives as described in VFMP sections 3.1- 3.5 (e.g. floodwater conveyance for Lindo Channel, airport safety for airport parcels)

Objective 1.3 Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface

Objective 1.4 Make it easier for the City to efficiently complete future vegetation management projects (and increase pace and scale of vegetation management) by establishing standard project requirements for all work

Objective 1.5 Reduce the negative effects of parkland fires on structures, lives and natural resources

Goal 2. Restore and maintain appropriate fire return intervals in Chico's parklands

Objective 2.1 Fulfill the need for a comprehensive fuels management program for Bidwell Park as expressed in the 2008 BPMMP Natural Resources Management Plan

Objective 2.2 Create conditions under which fire, when it does occur, can have beneficial effects in Chico's parkland ecosystems.

Objective 2.3 In grasslands, sustain health /and biodiversity (including by fostering good fire) while reducing any threats to homes, businesses or natural resources from unwanted grass fires

Objective 2.4 Post- fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine) create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity

Objective 2.5 In riparian areas, maintain riparian values, including cold water temperatures needed by salmon and riparian buffers' ability to filter sediment, while reducing overgrowth by removing invasive plants first before removing any native plants.

To these~~at~~ ends, the Plan ~~identifies and characterizes the City's existing high fire hazard areas, presents policies and management actions to reduce parkland fire hazards and impacts in each of the City's five main vegetation communities, and~~ provides a framework for seeking funds, coordinating efforts with agencies and private landowners, and prioritizing work efforts. Although the primary driver of the Plan is the need to improve wildfire safety, the City believes the Plan should and does enhance other values that are meaningful to Chico's residents and visitors, including recreation values; community safety; Chico heritage and historic values; tribal cultural

Page 9 is revised as follows:

Table 1 — Mitigation Measures Key to Impact Levels: NI = No Impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable			
4.4 Biological Resources			
Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		Mitigation Measure BIO-1a: ***Compensatory Mitigation to Special-Status Wildlife, If Applicable*** If the provisions of **SPR BIO-5a** cannot be implemented and additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or	

Page 12 is revised as follows:

4.10 Hydrological Resources			
Impact HYDRO-j: ~~Project activities could cause hydrological adverse impacts or impacts to qater quality through bank instability if they remove all the vegetation in a given streambank area,~~ ~~e.g. for *Arundo donax* removal projects.~~ Arundo eradication activities that remove a significant amount of vegetation may result in an adverse impact to water quality by potentially destabilizing the bank or creek-bed.	PS	**Mitigation Measure HYDRO-1:** ***Replant Native Vegetation into Arundo Root Balls .*** To mitigate for **Impact HYDRO-j**, after Little Chico Creek Arundo Eradication (key project # 6) the City shall plant or cause to be planted native willow and other native vegetation along portions of Little Chico Creek where *Arundo* was formerly the dominant vegetation. Native plants can be planted directly into the *Arundo* root ball and should be planted at densities and protocols established in the region as best practices for creeks similar to Little Chico Creek in elevation, hydromorphology, and flow regime. Because streamside work needs to be carried out under the terms of a 1600 permit from CDFW **(SPR BIO-10)** as well as potentially an encroachment permit from CVFPB (if required), this mitigation measure would still need to be reviewed by CDFW and potentially CVFPB to ensure it adequately mitigates for this potentially significant impact. If CDFW and/or CVFPB stipulated more stringent mitigation under the terms of its/their permit(s), that more stringent mitigation would be applied.	LTSM

Page 14 (1.4, Alternatives) is revised as follows:

is valuable to have a clearly written set of objectives to guide analysis of alternatives. As stated in the VFMP and described above in 1.1, the program objectives are as follows:

- Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface
- Reduce the negative effects of parkland fires on structures, lives and natural resources
- Create conditions under which fire, when it does occur, can have beneficial ecological effects
- Make it easier for the City to efficiently complete future vegetation management projects by establishing standard project requirements for all work
- Reduce fire hazard to homes, businesses, and natural resources while continuing to manage natural parks (e.g. Bidwell, Verbena Fields, and the others listed in VFMP sections 2.1-2.5) for natural values, while managing other parklands for their respective primary management objectives as described in VFMP sections 3.1-3.5 (e.g. floodwater conveyance for Lindo Channel, airport safety for airport parcels)
- Post-fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine, and Valley Oak), create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity
- Identify and characterize the City's existing high fire hazard areas, and present policies and management actions to reduce parkland fire hazards and impacts in each of the City's five main vegetation communities.
- Fulfill the need for a comprehensive fuels management program for Bidwell Park as expressed in the 2008 BPMMP Natural Resources Management Plan
- Create conditions under which fire, when it does occur, can have beneficial effects in Chico's parkland ecosystems.
- In grasslands, sustain health /and biodiversity (including by fostering good fire) while reducing any threats to homes, businesses or natural resources from unwanted grass fires
- In riparian areas, maintain riparian values, including cold water temperatures needed by salmon and riparian buffers' ability to filter sediment, while reducing overgrowth by removing invasive plants first before removing any native plants.

Page 18 is revised as follows:

"does good work" is a goal of many parks and fire departments. It is now widely recognized that Maidu people, including the Mechoopda who are the original inhabitants of Chico, successfully managed the watersheds of what is now Butte County with deliberate fire for many thousands of years, and that suppression of these cultural fires is among the causes ~~a primary cause~~ of the wildfire crisis California is enduring today. Returning Sierra Nevada foothill parklands to a healthy vegetation density could restore a historic cycle in which fires burn in a patchy mosaic with mixed intensity or low intensity. Important to understand is that high-severity fires tend to set the stage for repeated

---

Page 19 (Background of Program Objectives) is revised as follows:

To minimize fire risk and restore and maintain ecological health and appropriate fire intervals in Chico's parklands, the program objectives are as follows:

- Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface
- Reduce the negative effects of parkland fires on structures, lives and natural resources
- Create conditions under which fire, when it does occur, can have beneficial ecological effects
- Fulfill the need for a comprehensive fuels management program for Bidwell Park as expressed in the 2008 BPMMP Natural Resources Management Plan
- Make it easier for the City to efficiently complete future vegetation management projects (and increase pace and scale of vegetation management) by establishing standard project requirements for all work
- Reduce fire hazard to homes, businesses, and natural resources while continuing to manage natural parks (e.g. Bidwell, Verbena Fields, and the others listed in VFMP sections 2.1-2.5) for natural values, while managing other parklands for their respective primary management objectives as described in VFMP sections 3.1-3.5 (e.g. floodwater conveyance for Lindo Channel, airport safety for airport parcels)

- Post- fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine) create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity
- In grasslands, sustain health and biodiversity (including by fostering good fire) while reducing any threats to homes, businesses or natural resources from unwanted grass fires
- In riparian areas, maintain riparian values, including cold water temperatures needed by salmon and riparian buffers' ability to filter sediment, while reducing overgrowth by removing invasive plants first before removing any natives.
- Identify and characterize the City's existing high fire hazard areas, and present policies and management actions to reduce parkland fire hazards and impacts in each of the City's five main vegetation communities.
- Fulfill the need for a comprehensive fuels management program for Bidwell Park as expressed in the 2008 BPMMP Natural Resources Management Plan

Page 26 is revised as follows:

In case a future activity on City parklands is proposed, sponsored or carried out by another agency, the project consistency checklist is designed so it can also be ~~be~~ used by any other "project proponent". For example, CAL FIRE or the Wildlife Conservation Board might fund a future vegetation

---

Page 28 is revised as follows:

2.6 PERMITS AND APPROVALS; AGENCY RESPONSIBILITIES

Implementation of the proposed Plan will require formal adoption of the Plan by the Bidwell Park and Playgrounds Commission and the City Council. The following permits or approvals will be required for at least some elements of the plan:

- Burn permit and smoke management plan from the Butte County Air Quality Management District for prescribed burning of vegetative debris and landscape restoration projects as proposed under the Plan;
- Burn approval ~~permits~~ from Chico Fire Department ~~CAL FIRE~~ for prescribed burning;

Page 32 is revised as follows:

3.5 Post-Treatment Monitoring and Maintenance

Each future activity work plan will be developed with the assistance of the Project Consistency Checklist, which will generate a list of applicable SPRs for the project manager. This list of SPRs will form a starting point for the composition of a detailed work plan, as well as a mitigation and monitoring plan, or MMRP. The City will conduct the monitoring for a period specified in the work plan and MMRP. For most units, the City expects that vegetation thinning and reduction will be needed about 3-5 years after the initial treatment. For some areas, maintenance will need to be done every few years in perpetuity.

Page 44 is revised as follows:

It is the responsibility of the Butte County Air Quality Management District to ensure that projects within the County (including inside city limits) do not unacceptably contribute to nonattainment. BCAQMD was consulted about potential air quality impacts from the VFMP during scoping, and the District recommended two measures that should be incorporated into all relevant future activities under the PEIR. The District's two recommendations ~~for mitigating impacts to below a level of significance~~ were adopted into this EIR (see next page and 4.3.4).

Page 45 is revised as follows:

The primary issues raised in comments on the notice of preparation that pertain to air resources included the following two recommendations from the BCAQMD:

- The BCAQMD acknowledges the need for a Smoke Management Plan (SMP) as noted in the VFMP. It can be assumed that the prescribed burning portion of the program would not conflict

---

Page 48 is revised as follows:

Finally, it is important to consider that many plant and animal populations may qualify as living cultural resources of special significance to local Tribes, yet have no special legal status as defined by the State, the U.S., or non-Tribal regional or local entities. These resources are addressed through processes and SPRs described in section 4.18, Tribal Cultural Resources.

Page 54 and the corresponding passage in Appendix C are revised as follows:

SPR BIO-1: Review and Survey Project-Specific Biological Resources: The project proponent will require a qualified specialist ~~RPF or biologist~~ to conduct a data review and reconnaissance-level survey prior to treatment. The data reviewed will include the biological resources setting, sensitive species and natural communities tables, and habitat information in the EIR relevant to the location where the treatment will occur. It will also include review of the best available, current data for the area, including species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the setting present on a treatment site. The qualified specialist ~~surveyor~~ will

1) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests); and 2) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife or rare plant observations. Habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the Project Consistency Checklist for each treatment activity, unless it can be demonstrated that habitat assessments older than one year remain valid. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified ~~RPF or biolog~~ specialist, will determine which one of the following best characterizes the treatment:

1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.

If, based on the data review and reconnaissance-level survey, the qualified ~~RPF or biolog~~ specialist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment:

Pages 54-55 and the corresponding passage in Appendix C are revised as follows:

Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified ~~RPF or biolog~~ specialist.

2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.

Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. See **SPR BIO-4** for more about protocol-level surveys.

SPR BIO-2: Biological Surveyor Qualifications. A qualified specialist able to conduct surveys under **SPR-BIO-1** and **SPR-BIO-4** is someone whose experience and references indicate they possess the regionally appropriate knowledge of species and protocols needed to perform the particular survey for

which they are being hired. ~~All field survey professionals/biological technicians conducting surveys under **SPR BIO-1** and **SPR BIO-4** should demonstrate regionally appropriate knowledge of species and protocols.~~ Statewide or national certifications or degrees are not a substitute for Butte County-specific biological expertise.

Page 55 and the corresponding passage in Appendix C are revised as follows:

CNPS has certified just 29 botanists statewide, fewer than one per county (CNPS 2020). Many Butte County botanists with outstanding ability to complete field surveys in Chico parklands have not chosen to obtain certification, partly because CNPS certification requires statewide botanical knowledge that has limited ~~no~~ professional value to a botanist who works in a single region of California. Further, relying on certification would hinder the City's ability to partner with competent student-based crews such as the CSU, Chico Ecological Reserves' undergraduate and graduate botany experts. The Wildlife Society has certified 2,300 professionals nationwide (TWS 2020), still fewer than one per county.

SPR BIO-3: Integrate EDRR (Early Detection, Rapid Response) Into Reconnaissance-Level Surveys. During reconnaissance-level surveys, the qualified specialist ~~surveying botanist~~ shall identify any infestations of invasive plant species (i.e., those on the list in Appendix E ~~section 3-7~~) so managers can target them for removal during treatment activities. While the City does not have the resources to remove every invasive plant, the City does have an established rubric for prioritizing which invasives to remove (i.e., those with the highest potential to disrupt native ecologies, especially fire ecologies). This rubric is found in Appendix E ~~section 3-7~~ of this PEIR. Treatment methods will be selected based on the invasive species present and, subject to CEQA like all other treatments, may include whatever treatment will be most effective in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Managers will base treatments on the guidance in Appendix E ~~section 3-7~~ and on additional information that may be available to crews and managers in the future.

SPR BIO-4: Protocol-Level Surveys. If **SPR BIO-1** determines that sensitive natural communities or sensitive habitats for plants, wildlife, or both may be present and adverse effects cannot clearly be avoided, the project proponent will require a qualified specialist ~~RPF(s) or biological technician(s)~~ to perform a protocol-level survey of the treatment area prior to the start of treatment activities.

Wildlife surveys **-** If **SPR BIO-1** determines that suitable habitat is present for wildlife (including nursery sites), and adverse effects cannot clearly be avoided, then focused or protocol-level surveys must be conducted for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified specialist ~~RPF or biologist~~ based on the species and habitats and any recommended buffer distances in agency protocols.

The qualified ~~RPF or biologist~~specialist will determine if following an established protocol is required; if so, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at:

Pages 55-56 and the corresponding passage in Appendix C are revised as follows:

must be conducted for special-status plant species and sensitive natural communities. Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that

could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified specialist~~RPF or botanist~~). The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities."

Page 56 and the corresponding passage in Appendix C are revised as follows:

BIO-5a: Flagging and Avoiding Sensitive Wildlife or Nursery Sites

If it is determined through application of **SPR BIO-4** that special-status wildlife or occupied wildlife nursery sites (e.g., nests, dens, bat roosts, burrows) are within the treatment boundary and the treatment cannot clearly be applied without harming the wildlife or impacting the nursery sites, the project proponent must physically avoid the area occupied by the wildlife by establishing a no-disturbance buffer around it. This buffer boundary shall be marked with high-visibility flagging, fencing, stakes, paint, or clear, existing landscape demarcations (e.g., edge of a roadway). Buffer size will be determined by a qualified specialist ~~RPF or biologist~~, in consultation with CDFW and/or USFWS (depending on the potentially affected species), using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 500 feet for special-status birds and 100 feet for other special-status wildlife species, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. These judgements will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Buffer size may be adjusted if the qualified specialist ~~RPF or biologist~~ determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below these minimum standards around an occupied site, a qualified specialist ~~RPF or biologist~~ will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the Project Consistency Checklist.

Consideration of factors such as the species' tolerance to disturbance, the presence of natural buffers provided by vegetation or topography, the height of the nest, the locations of foraging territory, the baseline levels of noise and human activity, and the nature of the treatment activity, among other factors, may inform an appropriate buffer size and shape.

Pages 56-57 and the corresponding passage in Appendix C are revised as follows:

When buffers cease to apply. When the qualified specialist ~~RPF or biologist~~ has determined that the young have fledged or dispersed; the nest, den, roost, or other occurrence is no longer active; or reducing/abandoning the buffer would not likely result in disturbance, mortality, or injury, then activity may resume inside the buffer zone. ~~A qualified RPF, biologist, or biological technician will be required to~~

~~monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of special-status wildlife, the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species.~~

Page 57 and the corresponding passage in Appendix C are revised as follows:

Alternatives to buffers If using a physical buffer is not feasible (e.g., for prescribed burning), the project proponent will use a temporal buffer by implementing the treatment outside the sensitive period of the species' life cycle (e.g., outside the breeding or nesting season). For species present year-round, the qualified specialist ~~RPF or biologist~~ will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species, or the burn tactics which would minimize harm (e.g., selecting weather conditions that would loft smoke away from cliffs that shelter bat roosts). The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods.

While performing review and surveys for SPR BIO-1 and SPR BIO-4, the qualified specialist ~~RPF or biologist/biological technician~~ with knowledge of the special-status wildlife species will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with large cavities, trees with nesting platforms; large raptor nests; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. The qualified specialist ~~RPF or biologist~~ with knowledge of the special-status wildlife species habitat and life history will review the treatment design with SPRs and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If it is determined the impact on special-status wildlife would be less than significant, no further mitigation will be required. If it is determined that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then **Mitigation Measure BIO-1a** will be implemented.

However, in cases where a qualified specialist ~~RPF or biologist~~ determines that a non-listed special-status wildlife population would benefit from the treatment, even though some of the non-listed special-status plants may be killed, injured or disturbed during treatment activities, no compensatory mitigation would be required. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified specialist~~RPF or biologist~~ will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the Project Consistency Checklist.

Bio-5b: Flagging and Avoiding Special-Status Plants

If it is determined through application of **SPR BIO-4** that special-status plants are within the treatment boundary and the treatment cannot clearly be applied without harming the special-status plants, the project proponent must physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around it. This buffer boundary shall be marked with high-visibility flagging, fencing, stakes, paint, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants. However, the size and shape of the buffer zone may be adjusted if a qualified specialist ~~RPF or botanist/City staffer~~ determines that a smaller buffer will be

Page 58 and the corresponding passage in Appendix C are revised as follows:

When buffers do not apply. Treatments may be conducted within the buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not make it difficult or impossible for the plant individuals (for perennial spp.) or population (for annual spp.) to recover. When assessing whether individuals/populations will be able to recover, the qualified specialist ~~RPF/botanist/City staffer~~ will take into account indirect effects from the treatment (e.g. changes in light/shading/air circulation).

The qualified specialist~~RPF or botanist~~ with knowledge of the special-status plant species habitat and life history will review the treatment design including SPRs and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA (e.g., because the plant's habitat would be rendered unsuitable post-treatment) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If it is determined the impact on special-status plants would be less than significant, no further mitigation will be required. If it is determined that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then **Mitigation Measure BIO-1b** will be implemented.

However, in cases where a qualified specialist ~~RPF or botanist~~ determines that a non-listed special-status plant population would benefit from the treatment, even though some of the non-listed special-status plants may be killed during treatment activities, no compensatory mitigation would be required. For a treatment to be considered beneficial to non-listed special-status plants, the qualified specialist ~~RPF or botanist~~ will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the Project Consistency Checklist.

Page 58 and the corresponding passage in Appendix C are further revised as follows:

SPR BIO-6: Require Ecological Knowledge Training for Workers. Crew members and contractors must receive training from a qualified RPF, specialist, botanist/biologist, Master Gardener, arborist, Tribal government-certified cultural resource instructor, or qualified City staffer prior to beginning a treatment activity. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; identification of noxious weeds in the area; marking protocols (i.e., the meaning of various colors of flagging/paint), and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified staffer.

Page 59 and the corresponding passage in Appendix C are revised as follows:

SPR BIO-8: Trees Marked For Removal by Qualified Personnel. No native tree larger than 8" DBH shall be removed unless marked beforehand by a qualified specialist, arborist, botanist, Registered Professional Forester, or City staff member with adequate training. Native trees smaller than 8 inches DBH may be removed without prior marking, if written into the activity scope and individuals implementing work have been adequately trained.

~~No native tree shall be removed (a "tree" is defined for the purposes of this section as larger than 8" DBH) unless marked beforehand by a qualified arborist, botanist, Registered Professional Forester, or City staff member with adequate training.~~ If the marker and remover are not the same person, it is of paramount importance that tree fellers/removers understand and interpret the marking system the same way as the marker(s).

Page 60 and the corresponding passage in Appendix C are revised as follows:

SPR BIO-15: Grazing Plans. A grazing plan shall be prepared for each grazing activity. A grazing plan shall specify, at a minimum:

- Stocking rates, e.g. in animal unit-months (AUMs), with acceptable tolerances up or down depending on the year's weather/forage
- Species of grazing animal acceptable; types of animals that are unacceptable (e.g., bulls), if any
- Dates (earliest in/latest out), with trigger points for moving animals (e.g. a certain % bare ground, a certain RDM)
- Monitoring responsibilities and timing (to monitor for trigger points)
- Desired post-grazing conditions (e.g., usually measured in residual dry matter (RDM) of between 300-800 lbs/ac for grasslands; measured in shrub story canopy closure or shrub height for upland mix)
- % permissible bare ground after grazing is concluded, and how excess bare ground would be remedied
- ~~Whether mother-offspring groups are acceptable or only stockers (stockers are easier to sell so provide more flexibility if weather or forage conditions change suddenly)~~
- Acceptable means of disposing of dead animals

Page 61 is revised as follows:

wildlife of the U.S. Fish and Wildlife Service!

The program area is located within the Mud Creek/Sycamore Creek, Big Chico Creek, and Little Chico Creek/Butte Creek Watersheds, which are part of the Sacramento River watershed.
The area provides potential habitat to 54 species of special-status wildlife, 50 species of special-status plants,

Page 88 is revised as follows:

Mitigation measure~~s~~ **HYDRO-1** and SPRs **SOIL-1** through **-4** have been designed to reduce the chance of human-caused slides to an insignificant level. Creeks are by their nature dynamic environments where banks can shift and slump if they are undercut by water and/or they lose their connective vegetation. For the Little Chico Creek arundo removal project, this impact could be potentially significant without mitigation, but **MM-HYDRO ~~SOIL~~-1** addresses this impact and reduces it to below a level of significance.

Page 95 is revised as follows:

4.9.1 Existing Conditions Chico, its residents, and its parkland users are exposed to a variety of hazards, natural and man-made. **Natural** hazards in the program area include wildfire, flooding, hazard trees (defined as snags or unstable trees that are likely to fall on trails or structures), poor footing on trails, and dangerous plants and animals such as rattlesnakes, tick-borne illnesses, mosquito-borne illnesses, and poison oak or guardian oak (*Toxicodendron diversilobum*). **Human-made** hazards in the program area (i.e., Chico's parklands, greenways, and open space) include hazardous litter and garbage (e.g. broken glass or used needles); human-caused illegal fire ignition; and a handful of legacy hazardous waste sites. The latter have been abated in accordance with California law and are considered no longer in need of monitoring unless the sites are disturbed. (See 4.9.2(d).)

Wildfire and flooding: The proposed program is designed to reduce the intensity of, and allow parkland users and residents more time to evacuate from wildfire (including illegally human-caused fires). It is not expected to have a significant influence on flooding.

Hazard trees: Prescribed fire and other vegetation management techniques may sometimes kill trees. Tree mortality is not an inherent problem, depending on tree density and age class mixture. Indeed, killing some percentage of the trees in an area is sometimes a stated objective of prescribed fire. The proposed program could produce tree mortality and snags. Snags are only hazard trees if their location makes them a potential hazard to trails (defined in most recent City guidelines as trees whose distance to a system or non-system trail, or to a road, is 150% or less of the tree's height). Hazard trees will be avoided or abated in accordance with **SPR HAZ-2** or **SPR HAZ-3,** as appropriate.

Natural biological hazards in the park: The proposed program will not increase the population of rattlesnakes~~;~~. If the program reduces total woody brush cover and increases the amount of land covered in grass and forms, ticks could be more numerous.~~, or~~ *Toxicodendron* is a fire-adapted shrub that could become more common in some areas with more frequent healthy fire.~~; but~~ If off-trail travel is more attractive after program implementation, more parkland users could encounter these existing hazards. Users could continue to protect themselves from these hazards by staying on trails, as they can now.

Hazardous garbage in creeks and parkways: Program implementation, to the extent it raises

Page 115 is revised as follows:

Arundo removal itself will not destabilize the bank (see below). However, after the arundo dies, which will occur over a period of years, those portions of the bank could eventually be left without any stabilizing vegetation, or could be colonized primarily by annual weeds that provide little bank stability (e.g., star thistle, *Melilotus* sweet clover.) Therefore, Arundo eradication work will be followed up by a bank re-stabilization planting protocol including native willows and other plants, as described in MM-~~SOIL~~ HYDRO-1.

Page 127 is revised as follows:

At the same time, visitors for whom low visibility is currently a deterrent to outdoor recreation might increase their parkland visits. Birdwatching and wildflower viewing opportunities might increase, in areas of the parklands that are currently very dense. Many of the most used areas of the parklands, such as ~~One Mile,~~ the Horseshoe Lake area, ~~the Golf Course~~ and the Disc Golf course, are unlikely to undergo any visual change because their vegetative fuels loading is already within the desired range for their vegetation community. Access impacts are further discussed in the Recreation section (4.16) of this document.

REVISIONS TO TEXT OF DRAFT VEGETATIVE FUELS MANAGEMENT PLAN (VFMP)

Appendix B/VFMP page 3 is revised as follows. None of the goals or objectives are new, but they have been collected in a concise list for ease of reference.

1 Introduction

1.1 Purpose

This Vegetative Fuels Management Plan ("VFMP" or "Plan") describes actions that the City will take over many years to minimize fire risk while ~~and~~ improving~~e~~ other values relating to vegetation, including ecological health, on the City's 6,400+ acres of parks, greenways, and open space. Although the primary driver of this plan is the need to improve wildfire safety, the Plan should and does address other values that are meaningful to Chico's residents and visitors. These include recreation values, community safety, Chico heritage and historic values, and ecosystem values such as water supply, conveyance and quality, native biodiversity (i.e., parklands free from invasive species), and habitat for wildlife (including agricultural pollinators) and wildflowers. The Plan includes several key projects that are high priorities, but it also guides and authorizes work on every acre of City-owned land, whether it is inside the footprint of a "priority" project or not.

The goals and objectives of the Plan are as follows:

Goal 1. Minimize fire risk while protecting ecological values

Objective 1.1 Identify and characterize the City's existing high fire hazard areas, and present policies and management actions to reduce parkland fire hazards and impacts in each of the City's five main vegetation communities.

Objective 1.3 Establish and implement strategic management actions on City-owned lands to reduce the likelihood of unwanted ignitions in the wildland-urban interface

Objective 1.4 Make it easier for the City to efficiently complete future vegetation management projects (and increase pace and scale of vegetation management) by establishing standard project requirements for all work

Objective 1.5 Reduce the negative effects of parkland fires on structures, lives and natural resources

Goal 2. Restore and maintain appropriate fire return intervals in Chico's parklands

Objective 2.1 Fulfill the need for a comprehensive fuels management program for Bidwell Park as expressed in the 2008 BPMMP Natural Resources Management Plan

Objective 2.2 Create conditions under which fire, when it does occur, can have beneficial effects in Chico's parkland ecosystems.

Objective 2.3 In grasslands, sustain health /and biodiversity (including by fostering good fire) while reducing any threats to homes, businesses or natural resources from unwanted grass fires

Objective 2.4 Post- fire, in the three woodland vegetation zones (Upland Mix, Blue Oak-Gray Pine) create an open stand of well-spaced single-or few-stemmed trees that has reduced horizontal and vertical fuel continuity

Objective 2.5 In riparian areas, maintain riparian values, including cold water temperatures needed by salmon and riparian buffers' ability to filter sediment, while reducing overgrowth by removing invasive plants first before removing any native plants.

Because cities rarely have the resources needed to complete all the work they would like, this Plan

Appendix B/VFMP Page 38 is revised as follows:

General Vegetation Management Standards for Upland Mix:

This vegetation type should be managed on a microclimate basis, thus allowing for expansion of the biodiversity in each microclimate. Biodiversity in this case, should not include invasive species; these should be prioritized for removal by grazing, hand, mechanical, or chemical treatments. Where appropriate species are present, canopy heights should be managed to be increased over time (e.g., raising canopies through hand treatments). This may be done through removal of invasive species, thinning, and pruning of shrub species, and then native tree species. Where they are present, populations of black oaks, valley oaks, broad leaf maples and other deciduous trees that do not present great fire hazards should be enhanced and should be prioritized over evergreen oaks.

Appendix B/VFMP page 65 is revised as follows:

Regulatory Permits and Approvals Needed

- Butte County Air Quality Management District Burn Permit
- Smoke Management Plan
- Chico Fire Department approval
- ~~CAL FIRE Permit (LE 5)~~

Appendix C is revised as follows:

SPR BIO-3: Integrate EDRR (Early Detection, Rapid Response) Into Reconnaissance-Level Surveys. During reconnaissance-level surveys, the surveying botanist shall identify any infestations of invasive plant species (i.e., those on the list in ~~section 3-7~~ Appendix E) so managers can target them for removal during treatment activities. While the City does not have the resources to remove every invasive plant, the City does have an established rubric for prioritizing which invasives to remove (i.e., those with the highest potential to disrupt native ecologies, especially fire ecologies). This rubric is found in ~~section 3-7~~ Appendix E to ~~of~~ this PEIR. Treatment methods will be selected based on the invasive species present and, subject to CEQA like all other treatments, may include whatever treatment will be most effective in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present.

Managers will base treatments on the guidance in ~~section 3-7~~ Appendix E and on additional information that may be available to crews and managers in the future.
Applies to treatment types: All. **Applies to vegetation communities:** All.

SPR BIO-6: Require Ecological Knowledge Training for Workers. Crew members and contractors must receive training from a qualified RPF, botanist/biologist, Master Gardener, arborist, or qualified City staffer prior to beginning a treatment activity. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; identification of noxious weeds in the area; marking protocols (i.e., the meaning of various colors of flagging/paint), and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified staffer.
Applies to treatment types: All. **Applies to vegetation communities**: All.

Appendix C is further revised as follows:

SPR BIO-8: Trees Marked For Removal by Qualified Personnel.

No native tree larger than 8" DBH shall be removed unless marked beforehand by a qualified specialist, arborist, botanist, Registered Professional Forester, or City staff member with adequate training. Native trees smaller than 8 inches DBH may be removed without prior marking, if written into the activity scope and individuals implementing work have been adequately trained.

~~No native tree shall be removed (a "tree" is defined for the purposes of this section as larger than 8" DBH) unless marked beforehand by a qualified arborist, botanist, Registered Professional Forester, or City staff member with adequate training~~. If the marker and remover are not the same person, it is of paramount importance that tree fellers/removers understand and interpret the marking system the same way as the marker(s). **Applies to treatment types:** Hand work, machine work. **Applies to vegetation communities:** All.

Appendix E title page is revised as follows:

Appendix E

Some High Priority Invasive Species in Chico Parklands,
With Some Best Practices for their Removal

Appendix E p. 7 is revised as follows:

Blackberry, Armenian (a.k.a. Himalayan) and cutleaf (*Rubus armeniacus* and *laciniatus*)
Species Characteristics: Not to be confused with the 3-leaflet native species, *Rubus ursinus and R. leucodermis* ~~*discolor*~~, which has a subdued cane habit of growth rather than forming a dense thicket. Native species also have soft spines, not thorns. The vigorous Armenian sp. has 5 leaflets

Appendix E page 8 is revised as follows:

Puncturevine a.k.a. goathead (*Tribulus terrestris*)
Species Characteristics: Summer annual that thrives in hot dry exposed places where other plants cannot, such as dirt pathways and parking lots. Its spiky 'caltrop' shaped seed bur catches on passing traffic to disperse to other sites, puncturing tires and injuring pet paws in the process. It forms a spreading dense mat that radiates out from the taproot. Its hairy leaves are compound and opposite each other on the stems; yellow five-petaled flowers up to 0.5 inch across grow from leaf axils.
Eradication Methods and Schedule: Germination occurs not in one cohort (all at once) but spread over months May-July, so repeat treatments are required to prevent seed development. Foliar spot spray every 3 weeks May-July with 0.11 lb ae/acre aminopyralid, or 2 lb ae/acre triclopyr ester, or a combination of the two at half those rates; or 1 lb ae/acre glufosinate; or 1-2 lb ae/acre glyphosate. Puncturevine can be removed by hand with a trowel during the flowering stage.

Appendix E page 9 is revised as follows:

Pokeweed (*Phytolacca americana*)
Species Characteristics: Herbaceous perennial in riparian areas that develops a large storage Taproot. Fleshy red hollow stems die back every winter. Clusters of dark inky berries are favored by birds and mature at the same time as blackberry - so removal of blackberry thickets may release a flush of pokeweed.
Control Methods and Schedule: ~~Efforts to c~~Eradicating~~e~~ pokeweed ~~are~~ is not ~~feasible~~easy, so benefits of control efforts must be specifically defined - such as preventing infestation that may impede reestablishment of natives where some activity leaves bare soil. Removal of blackberry t~~T~~hickets is a good example of this. Pokeweed can be controlled by hand-pulling in its first year of life. An EDRR program is important with this weed.

4 MITIGATION AND MONITORING PLAN

INTRODUCTION

When approving projects with mitigation measures that if implemented would avoid or lessen otherwise potentially significant impacts, CEQA requires public agencies to adopt monitoring and reporting programs or conditions of project approval to mitigate or avoid the identified potentially significant effects (Public Resources Code Section 21081.6(a)(1)). A public agency adopting measures to mitigate or avoid the significant impacts of a proposed project is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). The mitigation measures required by a public agency to reduce or avoid significant project impacts not incorporated into the design or program for the project may be made conditions of project approval as set forth in a Mitigation Monitoring and Reporting Program (MMRP). The program must be designed to ensure project compliance with mitigation measures during project implementation. The City will use the Project Environmental Review Checklist, provided in Appendix A of this Final PEIR, to evaluate if individual activities are within the scope of the Program EIR and, if so and if the activity has potentially significant impacts, whether the PEIR mitigation measures are applicable. Individual projects that do not conform to the scope of the Program EIR or that have potentially significant impacts that could not be mitigated by applying the mitigation measures in the PEIR will require a new environmental document (e.g., an ND, MND, or EIR).

FORMAT

This MMRP is organized in a table format, keyed to each significant impact and mitigation measure. Each mitigation measure is set out in full, followed by a tabular summary of monitoring requirements. The column headings in the tables are defined as follows:

- **Mitigation Measure.** This column presents the full mitigation measure.
- **Timing.** This column describes when the measure must be implemented (e.g., before, during, or after the treatment activity).
- **Implementation Responsibility.** This column assigns the party responsible for implementation of the measures. In practice, “project proponent” generally means the City.
- **Monitoring Responsibility.** This column assigns the party responsible for monitoring implementation.

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR AIR-1: Smoke Management Plan for All Burns. Unless an exemption (e.g. for very small cultural burn demonstrations) is negotiated in advance with BCAQMD, all prescribed burns on Chico parklands will have a Smoke Management Plan (SMP) developed for them and approved by BCAQMD before implementation. As part of burn planning, park managers will coordinate prescribed burns with BCAQMD staff in order to choose the optimal conditions with which to burn in order to generate minimal smoke impacts to the community.	During work plan develop-ment before treatment	Project Proponent in collab with BCAQMD	BCAQMD
SPR AIR-2: Register All Portable Chippers. Portable chippers rated at 50 HP or greater shall be registered either with the District or through the statewide Portable Equipment Registration Program (PERP).	Before Treatment	Project Proponent	BCAQMD
SPR BIO-1: Review and Survey Project-Specific Biological Resources : The project proponent will require a qualified specialist to conduct a data review and reconnaissance-level survey prior to treatment. The data reviewed will include the biological resources setting, sensitive species and natural communities tables, and habitat information in the EIR relevant to the location where the treatment will occur. It will also include review of the best available, current data for the area, including species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the setting present on a treatment site. The qualified specialist will 1) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests); and 2) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife or rare plant observations. Habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the Project Consistency Checklist for each treatment activity, unless it can be demonstrated that habitat assessments older than one year remain valid. **(Continued next page)**	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR BIO-1 -- Continued from previous page Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified specialist, will determine which one of the following best characterizes the treatment: **1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.** If, based on the data review and reconnaissance-level survey, the qualified specialist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: **a.** by physically avoiding the suitable habitat, or **b.** by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified specialist. **2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.** Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. See SPR BIO-4 for more about protocol-level surveys.	Before Treatment	Project Proponent	City of Chico
SPR BIO-2: Biological Surveyor Qualifications. A qualified specialist able to conduct surveys under SPR-BIO-1 and SPR-BIO-4 is someone whose experience and references indicate they possess the regionally appropriate knowledge of species and protocols needed to perform the particular survey for which they are being hired. Statewide or national certifications or degrees are not a substitute for Butte County-specific biological expertise.	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR BIO-3: Integrate EDRR (Early Detection, Rapid Response) Into Reconnaissance-Level Surveys. During reconnaissance-level surveys, the qualified specialist shall identify any infestations of invasive plant species (i.e., those on the list in Appendix E of the VFMP PEIR) so managers can target them for removal during treatment activities. While the City does not have the resources to remove every invasive plant, the City does have an established rubric for prioritizing which invasives to remove (i.e., those with the highest potential to disrupt native ecologies, especially fire ecologies). This rubric is found in Appendix E of the VFMP PEIR. Treatment methods will be selected based on the invasive species present and, subject to CEQA like all other treatments, may include whatever treatment will be most effective in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Managers will base treatments on the guidance in Appenidx E of the VFMP PEIR and on additional information that may be available to crews and managers at the time of treatment.	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR BIO-4: Protocol-Level Surveys. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats for plants, wildlife, or both may be present and adverse effects cannot be avoided, the project proponent will require a qualified specialist to perform a protocol-level survey of the treatment area prior to the start of treatment activities. ***Wildlife surveys*** If SPR BIO-1 determines that suitable habitat is present for wildlife (including nursery sites), and adverse effects cannot clearly be avoided, then focused or protocol-level surveys must be conducted for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified specialist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified specialist will determine if following an established protocol is required; if so, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols . The City or project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no less than 14 days and no more than 30 days before the beginning of implementation. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. ***Plant surveys*** If SPR BIO-1 determines that suitable habitat is present for special-status plants or sensitive natural communities, and adverse effects cannot clearly be avoided, then focused or protocol-level surveys must be conducted for special-status plant species and sensitive natural communities. Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified specialist). The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." For potentially occurring special-status plants not listed under CESA or ESA, surveys will not be required under the following circumstances: ***(1)*** If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the last 5 years and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. Or, ***(2)*** If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it very difficult or impossible for the target species to reestablish following treatment. For potentially occurring special-status plants that are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS.	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR-BIO-5: Flag rare plants or wildlife/wildlife nursery sites for avoidance when needed. **BIO-5a: Flagging and Avoiding Sensitive Wildlife or Nursery Sites** If it is determined through application of SPR BIO-4 that special-status wildlife or occupied wildlife nursery sites (e.g., nests, dens, bat roosts, burrows) are within the treatment boundary and the treatment cannot clearly be applied without harming the wildlife or impacting the nursery sites, the project proponent must physically avoid the area occupied by the wildlife by establishing a no-disturbance buffer around it. This buffer boundary shall be marked with high-visibility flagging, fencing, stakes, paint, or clear, existing landscape demarcations (e.g., edge of a roadway). Buffer size will be determined by a qualified specialist , in consultation with CDFW and/or USFWS (depending on the potentially affected species), using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 500 feet for special-status birds and 100 feet for other special-status wildlife species, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. These judgements will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Buffer size may be adjusted if the qualified specialist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below these minimum standards around an occupied site, a qualified specialist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the Project Consistency Checklist. Consideration of factors such as the species' tolerance to disturbance, the presence of natural buffers provided by vegetation or topography, the height of the nest, the locations of foraging territory, the baseline levels of noise and human activity, and the nature of the treatment activity, among other factors, may inform an appropriate buffer size and shape. When buffers cease to apply. When the qualified specialist has determined that the young have fledged or dispersed; the nest, den, roost, or other occurrence is no longer active; or reducing/abandoning the buffer would not likely result in disturbance, mortality, or injury, then activity may resume inside the buffer zone. Alternatives to buffers If using a physical buffer is not feasible (e.g., for prescribed burning), the project proponent will use a temporal buffer by implementing the treatment outside the sensitive period of the species' life cycle (e.g., outside the breeding or nesting season). For species present year-round, the qualified specialist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species, or the burn tactics which would minimize harm (e.g., selecting weather conditions that would loft smoke away from cliffs that shelter bat roosts). The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. **(Continued next page)**	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR-BIO-5: Flag rare plants or wildlife/wildlife nursery sites for avoidance when needed. **BIO-5a: Flagging and Avoiding Sensitive Wildlife or Nursery Sites (Continued from previous page)** While performing review and surveys for SPR BIO-1 and SPR BIO-4, the qualified specialist with knowledge of the special-status wildlife species will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with large cavities, trees with nesting platforms; large raptor nests; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. The qualified specialist RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design with SPRs and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If it is determined the impact on special-status wildlife would be less than significant, no further mitigation will be required. If it is determined that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1a will be implemented. However, in cases where a qualified specialist determines that a non-listed special-status wildlife population would benefit from the treatment, even though some of the non-listed special-status plants may be killed, injured or disturbed during treatment activities, no compensatory mitigation would be required. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified specialistRPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the Project Consistency Checklist.	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
Bio-5b: Flagging and Avoiding Special-Status Plants If it is determined through application of SPR BIO-4 that special-status plants are within the treatment boundary and the treatment cannot clearly be applied without harming the special-status plants, the project proponent must physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around it. This buffer boundary shall be marked with high-visibility flagging, fencing, stakes, paint, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants. However, the size and shape of the buffer zone may be adjusted if a qualified specialist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. These judgements will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ***When buffers do not apply.*** Treatments may be conducted within the buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not make it difficult or impossible for the plant individuals (for perennial spp.) or population (for annual spp.) to recover. When assessing whether individuals/populations will be able to recover, the qualified specialist will take into account indirect effects from the treatment (e.g. changes in light/shading/air circulation). The qualified specialist with knowledge of the special-status plant species habitat and life history will review the treatment design including SPRs and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA (e.g., because the plant's habitat would be rendered unsuitable post-treatment) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If it is determined the impact on special-status plants would be less than significant, no further mitigation will be required. If it is determined that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1b will be implemented. However, in cases where a qualified specialist determines that a non-listed special-status plant population would benefit from the treatment, even though some of the non-listed special-status plants may be killed during treatment activities, no compensatory mitigation would be required. For a treatment to be considered beneficial to non-listed special-status plants, the qualified specialist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the Project Consistency Checklist.	Before Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR BIO-6: Require Ecological Knowledge Training for Workers. Crew members and contractors must receive training from a qualified RPF, specialist, botanist/biologist, Master Gardener, arborist, Tribal government-certified cultural resource instructor, or qualified City staffer prior to beginning a treatment activity. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; identification of noxious weeds in the area; marking protocols (i.e., the meaning of various colors of flagging/paint), and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified staffer.	Before Treatment	Project Proponent	City of Chico
SPR BIO-7: Prevent Spread of Invasive and Noxious Plants. (1) When mechanically removing invasives, if seeds or other propagules (such as Arundo stem nodes) are present, the plan for removal must incorporate a process for sanitary disposal of propagules (e.g. collect seed for separate disposal prior to plant removal, contain debris in some container during transport to avoid spreading propagules, burn debris on site if conditions permit to avoid having to move it, don't dispose of seedy debris elsewhere in park). Material heading into a chipper should be free of weed seeds and weed propagules first, if the chips will be broadcast back onto Chico parklands. (2) When leaving an area with infestations of invasive plants and noxious weeds, inspect all equipment for mud or other signs that weed seeds or propagules could be present. Crews must check clothing, footwear, and equipment for any soil, seeds, vegetative matter or other debris or seed-bearing material. Remove the soil or potential seed-bearing material, and leave it inside the infested area or dispose of it in a green waste receptacle or landfill receptacle. All heavy equipment and vehicles that come into contact with infested areas must be checked for soil and seed heads either at the infested location or at a headquarters location before proceeding to the next parklands location. Two valuable training resources on this topic are: Preventing spread on equipment, crews: https://www.cal-ipc.org/resources/library/publications/landmanagers/ Preventing spread through transportation: https://www.cal-ipc.org/resources/library/publications/tuc/	During and After Treatment	Project Proponent	City of Chico
SPR BIO-8: Trees Marked For Removal by Qualified Personnel. No native tree larger than 8" DBH shall be removed unless marked beforehand by a qualified specialist, arborist, botanist, Registered Professional Forester, or City staff member with adequate training. Native trees smaller than 8 inches DBH may be removed without prior marking, if written into the activity scope and individuals implementing work have been adequately trained. If the marker and remover are not the same person, it is of paramount importance that tree fellers/removers understand and interpret the marking system the same way as the marker(s).	Prior to and During Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR BIO-9: Refugia and "checkerboarding"; phased implementation. In sensitive natural communities or areas the RPF/biologist/City staffer determines to contain important wildlife forage or cover that would be affected by the treatment, areas to be treated will be treated in phases, in a "checkerboard" pattern. This strategy provides spatial and temporal heterogeneity that promotes a habitat-rich mosaic and leaves refugia for sensitive wildlife, especially pollinators. This SPR applies to hand and mechanical treatments. The size of blocs will be at the discretion of the RPF/biologist/City staffer, or (if applicable) will be planned under the terms of a 1600 permit. An example of phased implementation would be if the City receives grant funding to thin 100 acres of upland mix over 4 years, crews would thin 25 acres per year, in five 5-acre blocs.	Prior to and During Treatment	Project Proponent	City of Chico
SPR BIO-10: Lake and Streambed Alteration Permit (1600 Permit) Needed. Vegetation management in stream corridors requires prior negotiation of a Lake and Streambed Alteration Permit (LSA, or known as a 1600) from CDFW. The definition of the "stream corridor" is the responsibility of CDFW and may include areas which appear to be above the stream banks. LSAs can be negotiated project-by-project, but the City's preferred alternative is to negotiate a long term routine maintenance (or "master") agreement to cover all programmatic work in an area for five years. Over the permit life, routine maintenance agreements are more cost-effective in both dollars and staff time than project-by-project negotiations. When an LSA's stipulated mitigation measures and project requirements are more stringent than SPRs in this PEIR, the LSA's requirements shall prevail and shall be considered to reduce to below a level of significance the relevant environmental impacts CDFW addresses in the permit process.	Prior to Treatment	Project Proponent	City of Chico and CDFW
SPR BIO-11: To protect endemic *Polygonum bidwelliae* , no chips or slash shall be piled, burned, or scattered on top of exposed gravel flats made up of basalt or mudflow gravel ("basalt or mudflow vernal flat community"). These areas appear as small (one to several feet in diameter), flat to gently sloping dishlike or ribbonlike open areas, often surrounded by exposed rock, where vegetation is very short or not apparent. They may appear as "bare soil" at first glance but their audible crunch when walked on reveals the "bare soil" to be made up of small basalt pebbles. For a reference example, see the area at the top of the southernmost of the three South Rim Bidwell Park Oak Restoration and Wildfire Resiliency Units.	During Treatment	Project Proponent	City of Chico
SPR BIO-12: Protocol for when endangered plants or animals are found. If any new occurrences of plants protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) are encountered, then the person in charge on site (qualified City staff person, RPF, or biological technician) will adjust implementation plans, as appropriate. This would include flagging off the new occurrence so it can be avoided, with the appropriate buffer. If the person in charge on site does not know how to proceed, work will stop or move to a different location until a qualified biologist can arrive to assess the situation. If any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) are encountered, crews will wait for the animal to leave the area on its own. If the animal is unable to leave the site on its own (without being handled), the person in charge will immediately contact CDFW or USFWS, as appropriate.	During Treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR BIO-13: Chipping. To minimize ecological impact on recovering native understory vegetation, any chipping operations should minimize soil disturbance and broadcast chips away from sensitive plants. Where it is feasible, broadcast chips toward known invasive weed patches. The smaller the wood chip, the less flammable the resulting chipped mulch. To be fire-safe and to protect the roots of surviving plants from future fires, chips should be raked or scattered until they are not more than 4" deep. When possible, chip invasive species before seed set. If this is impossible, try to remove and bag for disposal as much invasive weed seed as feasible before chipping. If chips are suspected of having high quantities of weed seed, consider transporting them off-site to a processing destination (i.e., to green waste composting or biomass disposal) rather than leaving them in parklands.	During Treatment	Project Proponent	City of Chico
SPR BIO-14: Snags for wildlife. A target of 2-4 snags/acre (on average) should be retained across City woodlands. Snags should be retained where they do not pose a hazard to infrastructure or the public.	During tree marking & during treatment	Project Proponent	City of Chico
SPR BIO-15: Grazing Plans. A grazing plan shall be prepared for each grazing activity. A grazing plan shall specify, at a minimum: ●Stocking rates, e.g. in animal unit-months (AUMs), with acceptable tolerances up or down depending on the year's weather/forage ●Species of grazing animal acceptable; types of animals that are unacceptable (e.g., bulls), if any ●Dates (earliest in/latest out), with trigger points for moving animals (e.g. a certain % bare ground, a certain RDM) ●Monitoring responsibilities and timing (to monitor for trigger points) ●Desired post-grazing conditions (e.g., usually measured in residual dry matter (RDM) of between 300-800 lbs/ac for grasslands; measured in shrub story canopy closure or shrub height for upland mix) ●% permissible bare ground after grazing is concluded, and how excess bare ground would be remedied ●Acceptable means of disposing of dead animals ●List of invasive species whose spread must be limited and specific expectations for how spread will be limited (i.e., flush periods required after animals have been on a unit that contains invasive species, before moving them to a unit that does not) ●Whether there are areas from which animals must be excluded (e.g., areas of blue oak recruitment), means of exclusion, and remedies for failure of exclusion. ●Distance, in feet, to closest riparian corridor/stream (including ephemeral streams) and means of exclusion.	Before (when marking trees) & during treatment	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
Mitigation Measure BIO-1a: ***Compensatory Mitigation to Special-Status Wildlife, If Applicable*** If the provisions of SPR BIO-5a cannot be implemented and additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1.) Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and/or 2.) Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species), and/or 3.) In lieu of the measures described above, compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit, if required), if these requirements are equally or more effective than the mitigation identified above. The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. For species listed under ESA or CESA, the project proponent will submit the mitigation plan to CDFW and/or USFWS for review and comment. For other special- status wildlife species (not listed under ESA or CESA) the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. The Compensatory Mitigation Plan will include: For preserving existing habitat outside of the treatment area in perpetuity, a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. For restoring or enhancing habitat within the treatment area or outside of the treatment area, a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset, and as a result treatment activities would substantially reduce the number or restrict the range of listed wildlife species, then the treatment will not qualify as within the scope of this PEIR.	Prior to treatment activity	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
Mitigation Measure BIO-1b: ***Compensatory Mitigation to Special-Status Plants, If Applicable*** If the provisions of **SPR BIO-5b** cannot be implemented and additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1.) Preserving and enhancing existing populations outside of the treatment area in perpetuity (first priority). If that is not an option because existing populations that can be preserved in perpetuity are not available, 2.) Creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species) and/or 3.) Purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and/or4.) If the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. Finally, in lieu of the measures described above, compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above. The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The Compensatory Mitigation Plan will include:***(continued next page)***	Prior to treatment activity	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
Mitigation Measure BIO-1b: ***Compensatory Mitigation to Special-Status Plants, If Applicable*** ***(Continued from previous page)*** 1.) For compensatory mitigation that includes preservation of existing populations or creation of new populations, a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2.) For compensatory mitigation that includes relocation efforts, details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. After relocation, the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re- located/re-established populations will be considered self-producing when habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and the occupied area is comparable to existing occupied habitat areas in similar habitat types in the region. 3.) For compensatory mitigation that includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures. This includes information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. 4.) For compensatory mitigation that includes restoring or enhancing habitat within the treatment area or outside of the treatment area, a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR.	Prior to treatment activity	Project Proponent	City of Chico
SPR CUL-1: Consultation with Mechoopda Indian Tribe of Chico Rancheria prior to implementation of the project or activity. In accordance with BPMMP Appendix D, Mechoopda Indian Tribe of Chico Rancheria will be consulted prior to activity implementation (not just in Bidwell Park, but anywhere on Chico parklands) so that they may inform project implementers of cultural resources to be protected during implementation.	Prior to treatment activity	City of Chico	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR CUL-2: Archaeological surveys where applicable prior to implementation of projects. Archaeological surveys will be conducted by a qualified archaeologist prior to the implementation of any activity that includes ground disturbance, or if requested by a Tribe or other government. For the purposes of this section, "ground disturbance" does not include: **(a)** activity that is part of routine trail, road or infrastructural maintenance. **(b)** hand-dug fireline that removes only the duff layer down to bare mineral soil **(c)**Planting plugs, cuttings and scratched-in seed of native plants Archaeological surveys, if performed, will include archaeological records pull from the California Historical Resource Information System.	Prior to treatment activity	Project Proponent	City of Chico
SPR CUL-3: Avoidance of cultural/archaeological resources. Cultural resources present within the program area have not been formally evaluated to determine eligibility for listing on the CRHR. For the purposes of this program, these cultural resources will be assumed potentially eligible for state and federal registers and will be avoided. Project proponents will ensure that cultural resources are not adversely affected by management activities. If cultural resources cannot be avoided and disturbance will occur within the recorded site limits then the site(s) will be formally evaluated to determine if they meet the regulatory criteria for eligibility to the CRHR. If a site meets the criteria for eligibility to the CRHR, then it is protected, and no disturbance to the site can take place.	Prior to & during treatment activity	Project Proponent	City of Chico
SPR CUL-4: Protocol in case of unanticipated discovery of cultural resources. If a cultural resource is discovered within a project area after the project has been approved, the following procedures apply: 1.Project activities within 100 feet of the newly discovered cultural resource shall be immediately halted. 2.A qualified professional archaeologist shall be immediately notified. 3.The archaeologist shall evaluate the new discovery and develop appropriate protection measures. 4.The archaeologist shall investigate how the project was reviewed for cultural resources to determine if the cultural resource should have been identified earlier. 5.The archaeologist shall ensure that the newly discovered site is recorded and its discovery and protection measures are documented in the project files. 6.If the newly discovered site is a Native American Archaeological or Cultural Site, the Archaeologist shall notify the appropriate Native American tribal group and the NAHC, if appropriate.	During treatment activity	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR CUL-5: Protocol in case of encountering human remains. If human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and further recommendations regarding treatment of the remains can be provided. Mechoopda will also be contacted.	During treatment activity	City of Chico	City of Chico
SPR SOIL-1: Slope restrictions for mechanical equipment. Ground-based equipment (e.g., masticators, feller-bunchers) will be restricted to slopes less than 30%. This mitigation measure automatically excludes heavy equipment from all program area soils with erodibility ratings of "severe" or "very severe". Exceptions may be made for short pitches of 100 feet slope distance, up to 50 percent slope. Exposed soils resulting from ground based equipment on slopes over 30% slope shall be 90% covered with operational slash or low-weed-seed hay/straw to a minimum 2" depth prior to the winter period (Nov. 15 – April 1). This will occur after the conclusion of each individual operation and prior to each winter period for the life of the project. When areas over 30% slope occur in a project area, then the following methods shall be used to keep operators out of areas over 30% slope: flagging, mapping, and/or meeting with equipment operators. Hand work crews may work on slopes of any steepness, constrained only by crew supervisor judgement about personnel safety.	Prior to (planning) and during treatment activity	Project Proponent	City of Chico
SPR SOIL-2: Remediate exposed soil. On moderately or severely erodible soils (see map 5), after concluding any activities that incidentally disturbed the ground, crews shall cover exposed soil by scattering native slash, lopped vegetation, wood chips, or (if no on-site material is available), a low-weed-seed straw such as rice straw. The final percentage of exposed soil after scattering is complete shall be no more than 10%. This only applies on slopes, not flat areas (to avoid inadvertently covering up sensitive plants such as Polygonum bidwelliae in the "basalt or mudflow vernal flat community" which looks "like bare dirt" for most of the year). This mitigation measure does not apply to naturally bare rocky areas.	During and after treatment activity	Project Proponent	City of Chico
SPR SOIL-3: Minimize impacts from hand-cleared firelines. When identifying firelines, (1)existing trails and features shall be used as firelines whenever possible. (2)When construction of new fireline is necessary, firelines steeper than 30% slope shall be abated after the prescribed fire is finished. Firelines can be abated by scattering rice straw, chips, lop-and-scatter material, and/or leaves until exposed soil is no greater than 10%. (3)Firelines less steep than 30% slope, not abated, and not built as part of a trails project to Parks trail specifications, shall be obstructed using boulders or logs to discourage their use as unofficial trails until they naturally re-vegetate.	Prior to (planning), during and after treatment activity	Project Proponent	City of Chico
SPR SOIL-4: Blade work as incidental maintenance only. Bladed tractors shall not drop their blades off-road. Bladed tractors may only be present to perform maintenance repairs of incidental road damage caused by vegetation management equipment.	During and after treatments.	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR HAZ-1: Buffers to Water Features for Fuel and Oil Handling. No accelerants will be used within 100' of a perennial stream (HYDRO-8). Furthermore, to reduce the potential impacts from any inadvertent spill of fuel or oil, no equipment shall refuel, be cleaned, or lubricated within the following buffers, unless on an established road: Big Chico Creek:150150150 (three buffer widths are for 0-30% slope, 30-50% slope, and 50% or more slope). Perennial streams that don't have fish but may have aquatic life like frogs; this includes all springs with surface water and all ponds/lakes:5075100 Intermittent streams:255050	During treatments.	Project Proponent	City of Chico
SPR HAZ-2: Pre-Activity Hazard Tree Prevention. Before each prescribed fire project, unit prep crews will identify trees likely to be killed by the fire that are also likely to become hazard trees (e.g., trees whose distance to a road or trail is less than 150% of the tree's height). If keeping the tree alive is the desired condition based on fuel loading guidelines and burn planning review, then crews will take protective measures to help these trees survive the fire. These could include ringing (i.e., clearing a ring down to bare mineral soil around the base of the tree), removing ladder fuels, or other means. If keeping the trees alive is not the desired condition based on fuel loading guidelines and burn planning review, then crews will not take protective measures, but SPR-HAZ-3 (below) will still apply.	Before treatments.	Project Proponent	City of Chico
SPR HAZ-3: Post-Activity Hazard Tree Mitigation. After each prescribed fire project, any hazard trees produced by the fire will be abated in accordance with the City of Chico's post-fire hazard tree marking and removal guidelines.	After treatments.	Project Proponent	City of Chico
SPR HAZ-4: Only 'Caution' Signal Word Herbicides. Only herbicides bearing the Caution signal word (i.e. not Warning or Danger labelled) are used by the City of Chico. Additionally, no products containing imidacloprid, regardless of signal word, shall be applied onto or into City of Chico public trees (BPPC action taken 10/29/18); and no products containing glyphosate shall be applied upon or within City Plaza and Caper Acres (City Council action taken 10/15/19). In Chico parklands, no 'Restricted' chemicals are used. Exception: Certain additive Crop Oils (adjuvants) may be used when they have a Warning label, if that label has been applied due to potential eye damage from spray, a concern to the Applicator which does not reflect a concern to public, pets, or the environment.	Before and during treatments.	Project Proponent	City of Chico
SPR HAZ-5: Indicator Dye Needed for Herbicide Applications. An indicator dye shall always be added to the herbicide tank mix to help the applicator identify areas that have been treated and better monitor the overall application.	During treatments.	Project Proponent	City of Chico
SPR HAZ-6: Integrated Pest Management. The City utilizes the principles of integrated pest management (IPM), hires pest management contractors who are skilled in IPM, and is developing a citywide IPM policy. will seek to employ the safest effective method for controlling invasives with minimal environmental impact. Herbicide use should be considered when other treatment techniques are determined to be infeasible, ineffective, or not cost-effective in achieving desired management and maintenance standards. The lowest recommended rate to achieve vegetation management objectives of both herbicides and surfactants should be utilized to achieve desired control.	Before and during treatments.	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR HAZ-7: Herbicide Use: Role of Pest Control Adviser. Herbicides will always be applied in accordance with their label. However, herbicides law allows for herbicides to be applied for off-label uses if under the prescription of a licensed Pest Control Advisor (PCA), whose recommendation itself includes a "certification that alternatives and mitigation measures that would substantially lessen any significant adverse impact on the environment have been considered and, if feasible, adopted" (CCR 6556).	Before treatments & when considering new treatment plan.	Project Proponent	City of Chico
SPR HYDRO-1: Wet Weather Suspensions of Mechanical Treatment. Mechanical work will be limited based on the Parks' existing Adaptive Wet Weather Protocol (City of Chico 2015), as follows: If at least 1/4 inch of rain falls in a 24 hour period, the project implementer will suspend mechanical treatments for at least one day. This suspension will continue for each subsequent day that there is rain or a 70% or more forecast of additional rain or conditions remain wet, as described in the City's Adaptive Wet Weather Plan (City of Chico 2015). "Wet" means that more than 25% of the project area has puddles or mud, or a person walking on the project site leaves visible footprints ¼" deep or deeper. Mechanical treatments may resume when less than 25% of the project area has puddles or mud, or a person walking on the project site no longer leaves visible footprints ¼" deep. This SPR applies only to mechanical treatment methods. If a future 1600 maintenance agreement establishes more stringent wet weather limitations, then the more stringent limitations will take precedence.	During treatments.	Project Proponent	City of Chico
SPR HYDRO-3: Erosion Monitoring. The project implementer will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations before the rainy season. The implementer shall re-inspect the treatment area after the first large winter storm event of the season (i.e., ≥ 1.5 inches in 24 hours) and/or at least once annually, to evaluate the function of erosion control measures. Any area of erosion that will result in substantial sediment discharge will be remediated. This SPR applies to mechanical and understory burning treatment methods.	During and after treatments.	Project Proponent	City of Chico
SPR HYDRO-4: Minimize Burn Pile Size and Observe Setbacks from Trees. The project implementer will not create burn piles that exceed 4 feet in length, width, or diameter. In addition, burn piles will not occupy more than 15 percent of the total treatment area. Burn piles shall be at least 4' from any living tree, to avoid cooking the tree's tissues with the heat of the fire.	During treatments.	Project Proponent	City of Chico
SPR HYDRO-5: Observe Burn Pile Setbacks From Creeks. When building burn piles, the project implementer will observe the following setbacks from water features: (a)Ephemeral streams: 25' (b)Spring heads and pocket wetlands: 50' (c)Streams that support no fish (but may support amphibians): 50' (d)Streams that support fish: 75'	During treatments.	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR HYDRO-6: Guidelines for Water Drafting. The project proponent and project implementer, as applicable, will comply with the following requirements : ●Water drafting operations shall follow CFPR requirements in 14 CCR Section 963.7(l), which are intended to apply to water drafting operations in watersheds with listed anadromous salmonids but for this PEIR are proposed to apply throughout the program area. ●Vehicles used for water drafting shall only access drafting sites through existing watercourse crossings. ●Water drafting shall be subject to all applicable requirements of Fish and Game Code Section 1600, as determined in consultation with CDFW. ●Water drafting will not impact beneficial uses listed in the Water Quality Control Plan for the Central Valley (Basin Plan) (CVRWQCB 2018). ●In addition to the above (if not required for Section 1600 compliance), the following requirements shall be met for all water drafting operations in the program area: a.The project proponent shall consult with CDFW prior to any water drafting operation to convey and receive any information relevant to the drafting operation. b.Water shall not be drafted by more than one truck simultaneously at the same site. c.In Class I watercourses (i.e., Big Chico Creek and Little Chico Creek), streambed or bank material shall not be excavated for intakes or any other purposes related to drafting. d.All water drafting vehicles shall be checked each day used, and shall be repaired as necessary to prevent leaks of deleterious materials from entering the watercourse. e.Pumps used for drafting shall be capable of being adjusted to comply with specified withdrawal rates. f.Operators shall follow all applicable requirements and guidelines to prevent the introduction and spread of aquatic invasive species (AIS). This shall include: (i)inspecting truck tires, hoses, screens, and any equipment entering the water before and after each drafting operation and removing and properly disposing of any aquatic plants or other aquatic organisms; (ii)applying water only within the same watershed in which it originated. g.Intake screens shall be used wherever water is drafted, and shall be kept in good repair. Intakes shall be inspected periodically and kept clean and free of accumulated algae, leaves, or other debris that could block portions of the screen surface and increase approach velocities at any point on the screen. h.Intakes shall be at least 6 inches above the bottom of the channel and away from submerged vegetation, where practicable. Where not practicable, intakes shall maximize these clearances. i.At the end of drafting operations, intakes shall be completely removed from the watercourse and disturbed ground, including exposed soil, shall be treated according to Fish and Game Code Section 1600 requirements to minimize erosion.	Before and during treatments.	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR HYDRO-7: Comply with Water Quality Regulations. The project implementer will comply with all applicable water quality requirements adopted by Central Valley Regional Water Quality Control Board (CVRWQCB) and approved by the SWRCB (i.e., Basin Plan). If applicable, this includes compliance with the conditions of general waste discharge requirements (GWDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects.	Before and during treatments.	Project Proponent	City of Chico
SPR HYDRO-8: Stream Buffers for Prescribed Fire. Prescribed fire projects shall use no accelerants (e.g., drip torch fuel) within a 100' buffer to any perennial stream. Backing fire will be used into ephemeral drainages to reduce the intensity of fire in drainages. No discernible direct or indirect effects to water quality would be expected as live vegetation within the buffer would be left to function as a sediment filter strip.	During fire treatments.	Project Proponent	City of Chico
Mitigation Measure HYDRO-1: ***Replant Native Vegetation into Arundo Root Balls*** . To mitigate for **Impact HYDRO-j**, after Little Chico Creek Arundo Eradication (key project # 6) the City shall plant or cause to be planted native willow and other native vegetation along portions of Little Chico Creek where *Arundo* was formerly the dominant vegetation. Native plants can be planted directly into the *Arundo* root ball and should be planted at densities and protocols established in the region as best practices for creeks similar to Little Chico Creek in elevation, hydromorphology, and flow regime. Because streamside work needs to be carried out under the terms of a 1600 permit from CDFW **(SPR BIO-10)** as well as potentially an encroachment permit from CVFPB (if required), this mitigation measure would still need to be reviewed by CDFW and potentially CVFPB to ensure it adequately mitigates for this potentially significant impact. If CDFW and/or CVFPB stipulated more stringent mitigation under the terms of its/their permit(s), that more stringent mitigation would be applied.	Securing concurrence from CDFW on sufficiency of this mitigation measure: Before commencing treatment. Planting	Project Proponent	City of Chico
SPR NOISE-1: Maintain noise-producing equipment properly. Research and label each piece of motorized equipment with its peak operational decibel level. Properly maintain equipment according to manufacturers' specifications and equip each piece of equipment with noise control, such as mufflers.	Prior to treatment activity	Project Proponent	City of Chico
SPR-NOISE-2: Ensure equipment noise is below allowable construction noise limits. Ensure that equipment to be used does not emit a noise level of greater than 83 decibels at a distance of 25 feet. Only operate machines that make loud noise (e.g., chainsaws, chippers) between the hours of 10 am -6 pm on Sundays and holidays, and 7 am -9 pm M-Sa excluding holidays.	Before and during treatment activity	Project Proponent	City of Chico
SPR NOISE-3: Personal Protective Equipment. Ensure all crew members who operate chainsaws, chippers, etc. have adequate ear protection rated for the decibel level of the equipment they are using.	During treatment activity	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR REC-1: Advance notice of recreational closures related to vegetation management. The week before closures due to prescribed fire activities are expected, the City will give notice of expected trail or area closures. Upcoming closures will be announced via press release, Parks social media accounts, and the City's website. Due to the weather-dependent nature of prescribed fire, it is usually not possible to specify closure dates accurately in advance. The closed area will be posted in the field on the day of operations. This SPR also applies to non-fire vegetation management activities that could pose a danger to recreational users accessing the unit, such as hazard tree felling and mastication activities.	Prior to treatment activity	Project Proponent	City of Chico
SPR TRANS-1: Notice of Closures of Transportation Routes. The week before closures due to vegetation management activities are expected, the City will give notice of expected road, lane, bike lane, trail or area closures. Upcoming closures will be announced via press release, Parks social media accounts, and the City's website. Due to the weather-dependent nature of some vegetation management activities, it is usually not possible to specify closure dates accurately in advance.	Prior to treatment activity	Project Proponent	City of Chico
SPR-TRANS-2: Flag or Sign Road/Lane/Route Closures Per Public Works Protocol. The closed area will be posted in the field on the day of operations in accordance with City of Chico Public Works policies already used for hazard tree removal or any other roadside maintenance that incidentally closes roads or lanes, including through use of signage, cones, a flagger, or additional traffic control personnel as appropriate for the site.	Prior to treatment activity	Project Proponent	City of Chico
SPR CUL-6: Gathering of Cultural Materials During Consultation. During consultation with Mechoopda, the project should be described in full so that materials from the project may be collected if desired. Most of the projects currently outlined have some element of vegetation removal. Instead of chipping or throwing vegetation away in green waste, it should be made available to the Mechoopda if they so choose. Parameters on how to do so should be established during consultation. Mechoopda may choose to make those resources available to other interested parties.	Prior to treatment activity	Project Proponent	City of Chico
SPR CUL-7: Establishment of Ethnobotanical Sites and Gathering Rights. During consultation Mechoopda may be invited out with the archaeologist for surveys if they so choose. During this time ethnobotanical sites may be protected and conserved. If particular ethnobotanical sites are significant due to providing a resource to be gathered, then gathering rights will be established. If ethnobotanical sites are deemed valuable for ceremonial or religious purposes then protections may be made that allows for closures to the public for cultural events.	Prior to treatment activity	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR CUL-8: Mechoopda may send a cultural monitor to be present during any portion of the implementation of any project. Project implementation may not be held up due to cultural monitor scheduling unless the project area has been deemed particularly significant. Where significance is defined by: The formal criteria (36 CFR 60.4) for determining NRHP eligibility, as follows: 1.The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP); 2.It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and 3.It possesses at least one of the following characteristics: Criterion A: Association with events that have made a significant contribution to the broad patterns of history (events). Criterion B: Association with the lives of persons significant in the past (persons). Criterion C: Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture). Criterion D: Has yielded, or may be likely to yield, information important to prehistory or history (information potential).	Prior to and during treatment activity	Project Proponent	City of Chico
SPR FIRE-1: Burn plan required for each prescribed fire. A prescribed burn plan will be developed for each proposed prescribed fire prior to implementation.	Prior to treatment activity	Project Proponent	City of Chico
SPR FIRE-2: Protocol in case of any accidental ignition during program work. If crews accidentally ignite a fire while conducting vegetation management work, they are to call 911 for response from the Fire Department. If the fire's spread is slow and crews can safely extinguish the fire with the tools, water, and fire extinguishers they have on hand, they should attempt to do so. If the fire becomes well-established and the forward spread is clearly beyond control, crews should not engage in firefighting at the head of the fire. If crews are in an area where the location of the fire makes egress impossible, they should move into an area already burned by the fire and wait for conditions to change before attempting to leave the area.	During treatment activity	Project Proponent	City of Chico

City of Chico VFMP PEIR Mitigation and Monitoring Plan			
Mitigation Measure or SPR	Timing	Implementing Entity	Verifying/ Monitoring Entity
SPR FIRE-3: Work adaptations during "red flag" or high fire danger events. (1)During periods of high fire hazard project supervisor shall check the National Fire Danger Rating System (NFDRS) maps at https://www.wfas.net daily. If the NFDRS rating for the project area is above 'High', all implementation personnel and contractors shall provide the following equipment: 4BC fire extinguisher or larger on each vehicle, and a complement of fire tools to equip every worker on the project site with at least one tool. (2)Every chainsaw operator will carry a fire extinguisher of at least 8oz. Each chipper, mower, or masticator should be equipped with a 4BC fire extinguisher and at least 1 fire tool per operator. (3)During NFDRS ratings of 'High' or above, vegetation management crews using chainsaws, masticators, or mowers, should consider working a schedule which starts early in the morning and halts work by 2pm (aka 'hoot-owl'). (4)During times of high fire hazard, vegetation management crews should not use metal-bladed weed-eater heads or mowers in dry grass or weeds after 10am.	Each morning before treatment activity and during work day	Project Proponent	City of Chico

5 BIBLIOGRAPHY/REFERENCES

BCAG (Butte County Association of Governments). 2014. "Chico Bike Map". Available for download at http://www.bcag.org/Planning/Bicycle/index.html. Published in collaboration with Chico Velo, the City of Chico, and B-Line Regional Transit.

City of Chico. 2019 (Jan. 2). "Administrative Procedure and Policy [AP&P] Manual No. 10-1. Subject: Board, Commission, Advisory Committees and Task Force Rules of Procedure."

CVFPB (Central Valley Flood Protection Board). 2021. "Frequently Asked Questions." Web page. Last accessed 2/12/21 at http://cvfpb.ca.gov/permitting/faq/.

Dore, S., Montes-Helu, M., Hart, S.C., Hungate, B.A., Koch, G.W., Moon, J.B., Finkral, A.J. & Kolb, T.E. (2012). Recovery of ponderosa pine ecosystem carbon and water fluxes from thinning and stand-replacing fire. *Global Change Biology*, 18(10), 3171-3185.

FCAT (Forest Climate Action Team). 2018. California Forest Carbon Plan: Managing Our Forest Landscapes in a Changing Climate. Sacramento, CA. 178p.

GEM (Geo Environmental Management) 2001. Sandy Gulch (Lindo Channel) Resource Inventory. Prepared for City of Chico, July 2001.

Goss, Michael, *et al*. 2020. "Climate change is increasing the likelihood of extreme autumn wildfire conditions across California." *Environmental Research Letters* (15) 094016.

Hurteau, M.D., G.W. Koch, and B.A. Hungate. 2008. Carbon protection and fire risk reduction: toward a full accounting of forest carbon offsets. *Frontiers in Ecology and the Environment,* 6:493-498.

Hurteau, M.D. and M. North. 2010. Carbon recovery rates following different wildfire risk mitigation treatments. *Forest Ecology and Management*, 260:930-937.

Ingalsbee, Timothy. 2015. "Ecological Fire Use for Ecological Fire Management: Managing Large Wildfires By Design." In RMRS-P-73, *Proceedings of the large wildland fires conference*; May 19-23, 2014; Missoula, MT, edited by Robert E. Keane, Matt Jolly, Russell Parsons, and Karin Riley, 120-127. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.

Liu, X. et al. (2017). Airborne measurements of western U.S. wildfire emissions: comparison with prescribed burning and air quality implications. *Journal of Geophysical Research: Atmospheres*, 122, doi:10.1002/2016JD026315. 22p.

Maestrini, B., Alvey, E.C., Hurteau, M.D., Safford, H., and Miesel, J.R. (2017). Fire severity alters the distribution of pyrogenic carbon stocks across ecosystem pools in a Californian mixed-conifer forest. *J. Geophys. Res. Biogeosci*., 122, doi:10.1002/2017JG003832.

NFPA (National Prescribed Fire Act of 2020), S. 4625, 116th Cong., § 2 (2020).

North, M., Hurteau, M., & Innes, J. (2009). Fire suppression and fuels treatment effects on mixed-conifer carbon stocks and emissions. *Ecological Applications*, 19(6), 1385-1396. doi:10.1890/08-1173.1.

NWCG (National Wildfire Coordinating Group). "NWCG Glossary of Wildland Fire, PMS 205." Last accessed at https://www.nwcg.gov/glossary/a-z on Feb. 9, 2021.

PSW (Pacific Southwest Research Station). 2011. "FRID_CentralValleyZone10_1." Geospatial vector data. Available through https://www.fs.fed.us/r5/rsl/clearinghouse/r5gis/frid/.

Schweizer, D. W., & Cisneros, R. (2016). Forest fire policy: change conventional thinking of smoke management to prioritize long-term air quality and public health. *Air Quality, Atmosphere & Health*, 1–4. Retrieved from http://doi.org/10.1007/s11869-016-0405-4.

Stephenson, N.L., Das, A.J., Condit, R., Russo, S.E., Baker, P.J., Beckman, N.G., Coomes, D.A., Lines, E.R., Morris, W.K., Rüger, N. & Alvarez, E. (2014). Rate of tree carbon accumulation increases continuously with tree size. *Nature*, 507(7490), 90-93.

Van de Water, K.M., and H.D. Safford. 2011. A summary of fire frequency estimates for California vegetation before Euro-American settlement. *Fire Ecology* 7(3): 26-58. doi: 10.4996/fireecology.0703026

Wertz, Paul. 2001. "Deer Herd Forecast." CDFG *Tracks*, Summer 2001 issue. California Department of Fish and Game.

Wiechmann, M. L., Hurteau, M. D., North, M. P., Koch, G. W., & Jerabkova, L. (2015b). The carbon balance of reducing wildfire risk and restoring process: an analysis of 10-year post-treatment carbon dynamics in a mixed-conifer forest. *Climatic Change*, 132(4), 709-719.

Wyoming Geographic Information Sciences Center (WYGISC). 2014. "wbdhu12_a_ca". Subwatershed Boundaries, California (12-digit HUC), 2013. Geospatial vector data. Available at: http://purl.stanford.edu/dq651jm0302.

YCRCD (Yolo County Resource Conservation District). 2019 (August). "Putah-Cache Watershed Arundo Eradication Project, Yolo and Solano Counties, California." SCH No. 2019089063.

6 APPENDIX A – PROJECT CONSISTENCY CHECKLIST

PROJECT CONSISTENCY CHECKLIST

A. 1 INTRODUCTION

The City of Chico Vegetative Fuels Management Plan (VFMP) Programmatic Environmental Impact Report (PEIR) provides for the implementation of land management and fuel reduction activities and associated environmental protections that would occur within the approximately 6,400-acre program area to reduce catastrophic wildfire risks and improve parklands health and resiliency. The later treatment activities covered by the PEIR, as well as details about the program area, are described in Chapter 2, "Program Description" of the PEIR and in Chapter 4 of the VFMP. The PEIR has been prepared under the direction of the lead agency, City of Chico, in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). The document was prepared in coordination with the California Department of Forestry and Fire Protection (CAL FIRE), the Butte County Resource Conservation District, and the Big Chico Creek Ecological Reserve, a neighboring land manager with a role in managing vegetation and wildfire fuel in the Big Chico Creek canyon upstream from City of Chico lands. The PEIR functions as a Program EIR in accordance with State CEQA Guidelines Section 15168 for CEQA review of later treatment activities. Each project implemented using the PEIR is subject to CEQA. Because no projects contemplated in the Plan have a commercial purpose, none are subject to the Z'berg-Nejedly Forest Practice Act (FPA) or the California Forest Practice Rules (CFPR).

Before implementing a future activity as part of the VFMP, the City of Chico or other project proponents will use the Project Consistency Checklist below to determine whether or not the future activity is a later activity within the scope of the analysis in this PEIR or requires its own independent environmental review (State CEQA Guidelines Section 15168[c]). The Project Consistency Checklist will be used:

- to document the evaluation of the site and the resources present;
- to evaluate each later treatment activity intended to implement the PEIR to determine whether the later treatment activity is consistent with the description of treatment methods contained in the PEIR, is within the geographic limits of the program area, and whether the effects on the environment were examined in the PEIR (State CEQA Guidelines Section 15168[c][1]).
- to evaluate whether the later treatment activity would

  (1) cause any new impact not discussed in this PEIR,

  (2) cause any substantially more severe *significant or cumulative* impact than was addressed in the PEIR, or

  (3) identify an effective new mitigation measure or alternative that is substantially different from those in the PEIR or found infeasible in the PEIR, but that now is feasible, and that the City declines to implement (State CEQA Guidelines Section 15162[a]).

If the proposed activity's effects on the environment were examined in the PEIR and none of the above-outlined outcomes are determined, the impacts of the later treatment activity can be found to be within the scope of this PEIR, and the City of Chico may approve the activity using the PEIR without any additional environmental document (State CEQA Guidelines Section 15168[c][1], [2], and [4]).

If a later treatment activity would have effects that were not examined in this PEIR, this checklist would serve as the initial study to determine whether the new impact would require preparation of an EIR, MND, or ND. The determination as to whether an ND, MND, or EIR is required for impacts that are not within the scope of this PEIR is subject to the "fair argument" standard. (Under this standard, an EIR is required when there is a fair argument, based on substantial evidence in the record, that the proposed treatment project may have a significant effect on the environment.) If a later analysis is required, it may tier from the PEIR where additional analysis is not required as provided in State CEQA Guidelines Section 15152.

Even if they are within the scope of this PEIR, later treatment activities could still require permits or approvals from other state, regional, or local agencies (e.g., California Department of Fish and Wildlife, Department of Water Resources), which are described in Section 2.6, "Required Permits and Approvals," of the PEIR. SPRs in this PEIR require the City or project proponent to secure these permits or approvals before implementation.

A. 2.1 Documenting Whether a Proposed Treatment is Within the Scope of the PEIR

A proposed vegetation management or fuel reduction activity is within the scope of the PEIR when it meets all of the following qualifications:

- Treatment Methods. The proposed treatment methods are consistent with the treatment methods described in Chapter 2, "Program Description" of the PEIR.
- Geographic Area. The proposed treatment site is within the geographic limits of the program area described in Chapter 2, "Program Description" of the PEIR.
- Environmental Impacts. The environmental effects of the proposed treatment have been covered in the PEIR and none of the criteria for preparation of subsequent CEQA documentation are met (State CEQA Guidelines Sections 15168(c)(2), 15162).

A. 2.2 Documenting Whether Impacts of a Proposed Treatment are Within the Scope of the PEIR

For the checklist to adequately document the impacts that are within the scope of this PEIR and do not require additional CEQA review and documentation, the checklist must demonstrate the following:

- Relevant PEIR Analysis. Identify the specific sections and impact numbers from this PEIR that contain information relevant to the proposed treatment activity.
- Additional Studies Prepared and References Cited. Attach to the completed checklist any site-specific studies, reports, and survey results used in support of the within-the-scope finding or impact significance determination, if less severe than that identified in the PEIR. Include copies of references cited in the checklist, which will be made available to the public by the project proponent upon request.
- Standard Project Requirements. For all projects, identify each SPR that is relevant to the treatment, which will demonstrate that the SPR will be integrated into treatment design.

- Environmental Impacts. Identify which impacts in the PEIR would occur from implementation of the later treatment activity. Because the intent of the PEIR is to disclose any and all potentially significant impacts that are reasonably foreseeable to occur from any of the treatments within the program area, it is expected that, due to site-specific conditions, many proposed vegetation management or fuel reduction projects will result in impacts less severe than those identified in the PEIR. If an impact identified as potentially significant in the PEIR would be less than significant for the later treatment project, the project proponent may demonstrate with substantial evidence in the checklist that the project impact is less than significant and mitigation measure(s) are not needed. Alternatively, a project proponent may rely on the impact significance determination in the PEIR, and, for potentially significant impacts, apply the relevant mitigation measures.

  Environmental effects of a future activity are not necessarily limited to those identified in the checklist, which merely lists all effects disclosed in this PEIR. For this reason, the checklist includes a space for the consideration of "New Impacts" under each resource area. The small amount of space provided under "New Impacts" is not intended to suggest new impacts would not or could not be found; the checklist is intended to be filled out electronically, so users will be able to add as much space as they need.

- Mitigation Measures. Identify each mitigation measure from the PEIR that is relevant to the proposed treatment activity. In the checklist, explain any components of the mitigation measures that are not applicable to the treatment. For any significance determination that is different than the PEIR, describe how each measure will address site-specific conditions and reduce the impact of the proposed treatment activity.

A. 2. 3 Providing Substantial Evidence

The impact determinations and within-the-scope findings in the checklist, as well as any explanation for planned deviations, identified parameters, or feasibility determinations associated with SPRs and mitigation measures, must be based on substantial evidence. ("Substantial evidence" is defined in Section 15384(b) of the CEQA Guidelines as "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts"). Therefore, the checklist will include analytical discussions of the conclusions reached. Discussions need not be lengthy, but they must be sufficient. Portions of the PEIR relied on for conclusions should be identified by section number and, if applicable, impact number, SPR number, etc. Ancillary information (e.g., site-specific surveys) not included in the PEIR but relied on for conclusions or required by PEIR measures will be attached to the completed checklist. A list of references cited in the checklist that are not cited in the PEIR will be included with the checklist.

STANDARD PROJECT REQUIREMENTS, MITIGATION MEASURES, AND MONITORING AND REPORTING

The analysis must consider the measures identified in the VFMP PEIR that will avoid, reduce, or otherwise mitigate potential impacts of the project. These measures take the form of SPRs and mitigation measures. Some SPRs and mitigation measures apply to all projects, while others only apply to projects that include specific treatment methods or locations. Section 3.4 of this PEIR provides a comprehensive list of SPRs and mitigation measures applicable to each treatment method.

Some SPRs need to be applied during preparation of the checklist (primarily SPRs BIO-1-4). To help the person who is completing the checklist, checklist questions based on these SPRs have been inserted in front of the impact analysis table.

Other SPRs need to be applied prior to treatment (e.g., SPR HAZ-3), during treatment implementation (e.g., SPRs HYDRO-4, -5, and -6) or immediately after treatment as a step in mop-up (e.g., SPR HAZ-4). The checklist is designed to help the City or project proponent organize all these SPRs into one place.

Next, the project proponent should complete a Mitigation Monitoring and Reporting Program (MMRP) for the treatment activity that would verify that all applicable SPRs and mitigation measures will be implemented, specify the timing of implementation for each, and identify the entity responsible for implementing and verifying or enforcing each measure. The MMRP should be included as an attachment to the checklist.

RESOURCE AREAS

The environmental resource areas in the checklist are the same as those analyzed in Chapter 4, "Environmental Impacts and Mitigation Measures," of the PEIR. For each resource area, the project proponent will consider:

1.) which impacts apply to the activity, based on the type of activity and the location;
2.) which SPRs apply to the activity, based on the type of activity and the location;
3.) which MMs apply to the activity, if any, based on the type of activity and the location;
4.) whether required SPRs (and/or mitigation measures) listed in the PEIR would be effective in avoiding, reducing, or mitigating environmental impacts of the future activity. (Again, this consideration will take into account the proposed activities and the specific resources on the proposed activity site(s).)
5.) Whether the remaining impacts, if any, are more significant than in the PEIR *AND*
6.) Whether the proposed activity could have any new impacts not listed in the PEIR.

Written explanations supporting all conclusions should be provided in the discussion following the checklist questions for each resource area. The "discussion" need not be lengthy, only sufficient to justify why the future activity would or would not have impacts not analyzed in the PEIR.

The checklist questions presented for each resource area identify, for each impact addressed in the PEIR, whether the impact applies to the later treatment activity and if so, identify the SPRs and/or mitigation measures that are applicable to the treatment activity. The checklist is also intended to identify whether the impact significance determination for the treatment activity is different than the impact significance determination in the PEIR. If it is different, the checklist will identify whether the difference constitutes a substantially more severe significant impact and is therefore not within the scope of the PEIR.

If it is determined that a substantially more severe significant impact that cannot be mitigated to a less-than-significant level would result from a later treatment activity, an EIR must be prepared. However, if one or more new mitigation measures incorporated into the project would mitigate the effects to a less-than-significant effect on the environment, then preparation of an MND would be appropriate. The ND, MND, or EIR may be limited to examining the impacts that are not within the scope of the PEIR and may tier from the PEIR where additional analysis is not required as provided in State CEQA Guidelines Section 15152.

"New" impacts are effects on the environment that were not addressed in the PEIR. For each new impact listed in the checklist, the project proponent should indicate whether the impact would be one of the following:

- New Impact that is Less Than Significant: The project would result in a new impact that is not analyzed in the PEIR; however, the impact would not be significant. In this case, the impact is not "within the scope" of the PEIR and, pursuant to CEQA Guidelines Section 15168(d), a subsequent ND could be prepared to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Less Than Significant with Mitigation Incorporated: The project would result in a new significant impact that is not analyzed in the PEIR, but due to the project proponent's willingness to incorporate new mitigation into the proposed project, the impact is clearly less than significant with feasible mitigation. In this case, the impact is not "within the scope" of the PEIR and an MND could be prepared consistent with CEQA Guidelines Section 15168(d). This section allows for use of a subsequent MND to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Potentially Significant: The project would result in a new significant impact that is not analyzed in the PEIR (which would be subject to the "fair argument" standard as a new impact), and the impact cannot be clearly mitigated to less than significant. In this circumstance, the impact is not "within the scope" of the PEIR, and preparation of a new EIR is required. The new EIR will cover the new potentially significant or significant impact(s) and need not further evaluate significant impacts already covered in the PEIR, which are documented in the checklist.

In summary, when additional environmental documentation is needed to augment the City of Chico VFMP PEIR for CEQA compliance for a later treatment activity, the checklist and accompanying analysis would serve the same function as an initial study that defines the topics to be addressed in the EIR, MND, or ND to cover the impacts that are not within the scope of the PEIR, as directed by State CEQA Guidelines Section 15168(d)(1).

ENVIRONMENTAL CHECKLIST

TREATMENT ACTIVITY INFORMATION

1. Project Title:

2. Project Proponent Name:
3. Contact Person Information and Phone Number/Email:
4. Project Location: [cross streets or other landmarks]
5. Total Area to be Treated (acres)
6. Description of Project: (Describe the whole action involved, including equipment to be used and planned duration of treatments (include multiple years if applicable) Provide cross references to specific subsections from Chapter 2 of the PEIR and/or Chapter 4 of the VFMP to demonstrate that treatments are consistent with those analyzed in the PEIR. Attach additional sheets if necessary.)

Treatment Description
[insert narrative description here]

Project Types *[see description in Sections 3.1 and 3.2 of the PEIR; provide detail in description of Initial Treatment*]

- ☐ Programmatic Vegetation Management Activity
- ☐ Planned VFMP Key Project

Treatment Methods [*see description in Section 2.2 of the PEIR, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Initial Treatment*]

- ☐ Prescribed Burning (Understory), acres
- ☐ Prescribed Burning (Pile Burning)
- ☐ Mechanical Treatment, acres Describe: _____
- ☐ Manual Treatment, acres Describe: _____
- ☐ Grazing, acres
- ☐ Herbicide application, acres Describe: _____

Vegetation Community or Communities

- ☐ Grassland, _____ acres
- ☐ Valley Oak, _____ acres
- ☐ Blue Oak-Gray Pine, _____ acres
- ☐ Riparian, _____ acres
- ☐ Upland Mix, _____ acres

7. Other Public Agencies Whose Approval is Required: (e.g., permits)

[attach list if needed; note status of any required approvals (permits) and level of environmental documentation for permits, if applicable (e.g., CDFW 1600]

DETERMINATION (To be completed by the project proponent)

On the basis of this checklist and the substantial evidence supporting it:

☐ I find that all of the effects of the proposed project (a) have been covered in the City of Chico Vegetative Fuels Management Plan PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the PEIR will be implemented. The proposed project is, therefore, WITHIN THE SCOPE of the VFMP PEIR. NO ADDITIONAL CEQA DOCUMENTATION is required.

☐ I find that the proposed project will have effects that were not covered in the VFMP PEIR. However, these effects are less than significant without any mitigation beyond what is already required pursuant to the PEIR. A NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project will have effects that were not covered in the VFMP PEIR or will have effects that are substantially more severe than those covered in the PEIR. Although these effects may be significant in the absence of additional mitigation beyond the PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the VFMP PEIR and/or (b) substantially more severe than those covered in the VFMP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature _____ Date _____

Printed Name _____ Title _____

City of Chico

EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the City of Chico Vegetative Fuels Management Plan PEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact, including impacts that have been identified in the PEIR as well as any new impacts that are specific to the proposed project or activity.
3. The discussion of each impact identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:
   - Explain whether the proposed treatment is consistent with the treatment types and activities addressed in the PEIR.
   - Identify SPRs and mitigation measures applicable to the treatment project.
   - (If applicable) For SPRs or mitigation measures that allow some flexibility in how they are applied, explain which components (or which level/degree/version) of the SPR or mitigation measure would be applied. Explain why it is appropriate to apply this SPR or mitigation measure in this way, based on the site- and/or treatment activity.
   - Briefly describe the final impact of the proposed treatment project.
   - (If applicable) Explain why the impact significance in the checklist is different than that found in the PEIR.
   - (If applicable) Explain why the SPR(s) or mitigation measures developed for this impact in the PEIR do not apply to this project. For example, where a potentially significant impact was identified in the PEIR, but the impact could not be potentially significant for the proposed treatment activity on the proposed site.
4. If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. An ND could be prepared, if the new impact would be less than significant even without mitigation. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the VFMP PEIR and focus the environmental analysis solely on issues that were not addressed in the PEIR.
6. Project proponents should incorporate into the checklist references to information sources for potential impacts, when they are available. Include a list of references cited in the checklist, and make copies of such references available to the public upon request.

A. 4. 1 AESTHETICS

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Impact AES-a: Have a substantial adverse effect on a scenic vista?	LTS	Section 4.1.2 (a)						
Impact AES-b: Adversely affect views from a scenic highway? (none in program area as of 2020)	NI	Section 4.1.2 (b)						
Impact AES-c: Significantly degrade the existing visual character or quality of public views of the site and its surroundings?	NI	Section 4.1.2 (c)						
Impact AES-d: New light or glare?	NI	Section 4.1.2 (d)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Impacts: Would the treatment result in other impacts to aesthetics that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: AES-e, AES-f, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact AES-a

Impact AES-b

Impact AES-c

Impact AES-d

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

Impact AES-...

A. 4. 2 AGRICULTURE AND FORESTRY RESOURCES

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-a: Convert prime farmland to non-farm use? (None in City of Chico-owned program area as of 2020)	NI	Section 4.2.2 (a)						
Impact AG-b: Conflict with existing zoning for ag use or Williamson Act (applies to private lands only, if any)?	NI	Section 4.2.2 (b)						
Impact AG-c: Cause rezoning of or conflict with zoning for forestland? (None in program area as of 2020)	NI	Section 4.2.2 (c)						
Impact AG-d: Result in loss of forestland/ conversion of forestland to non- forest use	NI	Section 4.2.2 (d)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Impacts: Would the treatment result in other impacts to agriculture or forestry that are not evaluated in the VFMP PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: AG-e, AG-f, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

N/a

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 3 AIR QUALITY

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AIR-a: conflict with or obstruct implementation of the applicable air quality plan?	LTS	Section 4.3.2(a)						
Impact AIR-b: result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	LTS	Section 4.3.2(b)						
Impact AIR-c: expose sensitive receptors to substantial pollutant concentrations?	LTS	Section 4.3.2(c)						
Impact AIR-d: Expose People to Objectionable Odors	NI	Section 4.3.2(d)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any; number them: AIR-e, AIR-f, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact AIR-a

Impact AIR-b

Impact AIR-c

Impact AIR-d

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 4 BIOLOGICAL RESOURCES

Yes No

Have adequate recent reconnaissance-level surveys been conducted for the activity area, to identify suitable habitat for special-status species, as described in SPR-BIO-1? ☐ ☐

If "no," complete adequate reconnaissance-level surveys first to allow you to complete the rest of this form.

What were the results of the reconnaissance-level surveys? (Check one of the 3)

☐ 1. No suitable habitat present for any sensitive species
☐ 2. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.

List species and why adverse effects can be avoided for each species (e.g., "physically avoid clearly demarcated habitat area," "treat outside of bird nesting season"/"burn during dormant season of sensitive annual or geophytic plant species," etc). Add more rows if needed and attach additional documentation or maps if helpful

Species	How adverse effects will be avoided

OR

☐ 3. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.

If box 3 is checked, then a protocol-level survey must be conducted. Attach survey report/map and summarize results below. Create additional rows if helpful

Species	Protocol-level survey conducted: date and results (present/absent)	Adverse effects avoidable/ unavoidable? (A/U)	**If avoidable**, say how adverse effects will be avoided; cite source for guidance (e.g., CDFW, botany consultant)

Do any unavoidable adverse impacts remain? Yes ☐ No ☐

If "no," then you may enter "LTS" in both BIO-a and BIO-d, and the activity is within the scope of the VFMP PEIR unless the activity will have other significant impacts or new impacts not listed in the VFMP PEIR.

If "Yes," will mitigation measure **MM-BIO-1** reduce the impacts to below a level of significance?

Yes ☐ No ☐

(Attach documentation from relevant trustee or responsible agency explaining why the mitigation measures are sufficient)

If "yes," then you may enter "LTSM," in both BIO-a and BIO-d, and the activity is within the scope of the VFMP PEIR unless the activity will have other significant impacts or new impacts not listed in the VFMP PEIR.
If "no," the City or project proponent must prepare a supplementary EIR.

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-a: have a substantial adverse effect, either directly, or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	LTSM	Impact 3.6-1, pp. 3.6-36 through 3.6-41						
Impact BIO-b: have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	LTS	Impact 3.6-2, pp. 3.6-41 through 3.5-55						
Impact BIO-c: have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	NI	Impact 3.6-3, pp. 3.6-56 through 3.6-58						
Impact BIO-d: interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LTSM	Impact 3.6-4, pp. 3.6-58 through 3.6-59						

Impact BIO-e: conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	NI	Impact 3.6-5, pp. 3.6-59 through 3.6-61						
Impact BIO-f: conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local/regional/ state habitat conservation plan?	NI	Impact 3.6-6, pp. 3.6-61 through 3.6-64						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impacts below, if applicable; number them: BIO-g, BIO-h, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact BIO-a

Impact BIO-b

Impact BIO-c

Impact BIO-d

Impact BIO-e

Impact BIO-f

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 5 CULTURAL RESOURCES and TRIBAL CULTURAL RESOURCES

Havve you consulted with the Mechoopda Indian Tribe of Chico Rancheria about this activity, as described in SPR-CUL-1?

Yes ☐ No ☐

If "no," consult with them first to allow you to complete the rest of this form.

What were the results of the conversation? (Check one of the 3)

☐ 1. Mechoopda declined to be consulted or indicated no cultural resources present

☐ 2. Mechoopda indicated cultural resources present, but adverse effects can be clearly avoided.

List resources and why adverse effects can be avoided for each species (e.g., "physically avoid flagged area," etc.) Add more rows if needed and attach additional documentation or maps if helpful. **NOTE:** This section and its supporting documentation, if it includes information submitted by the Tribe during the consultation process, may be kept confidential pursuant to subdivision (r) of Section 6254 of, and Section 6254.10 of, the Government Code, and subdivision (d) of Section 15120 of Title 14 of the California Code of Regulations.

Resource descptn/site #	How adverse effects will be avoided

OR

☐ 3. Cultural resources are present and adverse effects cannot be clearly avoided.

If box 3 **is not** checked, then you may enter "NI" in CUL-c, and the activity is within the scope of the VFMP PEIR unless the activity will have other significant impacts or new impacts not listed in the VFMP PEIR.

If box 3 **is** checked, continue consultation until you have a plan that avoids/protects the resources (attach plan). If you cannot protect the resources, either change the project area boundary to exclude the resources or formally evaluate the resources' eligibility for CRHR. (This will require a new CEQA document, e.g. a supplemental EIR. No project which does not avoid adverse impacts to a tribal cultural resource can be under the scope of the VFMP PEIR.)

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs and CFPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-a: cause a substantial adverse change in the significance of a historical or archaeological resource pursuant to § 15064.5?	LTS	4.5.2(a)						

Impact CUL-b: disturb any human remains, including those interred outside of formal cemeteries?	LTS	4.5.2(b)						
Impact CUL-c: cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is either (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), OR (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	NI	4.18.2(a)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Archaeological , Historical, or Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impacts below, if applicable; label them: CUL-d, CUL-e, etc, add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact CUL-a

Impact CUL-b

Impact CUL-c

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 6 ENERGY

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs and CFPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact ENER-a: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy that causes potentially significant environmental impact	NI	4.6.2(a)						
Impact ENER-b: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency	NI	4.6.2(b)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Impacts: Would the treatment result in other impacts from energy use that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: ENER-c, ENER-d, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact ENER-a

Impact ENER-b

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 7 GEOLOGY AND SOILS

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs and CFPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impacts SOIL-a-c: In earthquake zone, cause seismic problems, or expose people to seismic activity?	NI	4.7.2(a-c)						
Impact SOIL-d: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	LTS	4.7.2(d)						
Impact SOIL-e: result in substantial soil erosion or the loss of topsoil?	LTSM	4.7.2(e)						
Impact SOIL-f: would soil become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	LTSM	4.7.2(f)						
Impact SOIL-g: Located on expansive soil?	NI	4.7.2(g)						
Impact SOIL-h: Soils incapable of supporting sewer/septic systems needed to serve the project?	NI	4.7.2(h)						
Impact SOIL-i: directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	NI	4.7.2(i)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Geology/Soils Impacts: Would the treatment result in other impacts to geology or soils that are not evaluated in the VFMP PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: SOIL-j, SOIL-k, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact SOIL-a-c

Impact SOIL-d

Impact SOIL-e

Impact SOIL-f

Impact SOIL-g

Impact SOIL-h

Impact SOIL-i

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 8 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-a: Generate GHG emissions through treatment activities?	LTS	4.8.2(a)						
Impact GHG-b: Conflict with applicable plan adopted for the purpose of reducing the emissions of GHGs	LTS	4.8.2(b)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Greenhouse Gas Emissions and Climate Change Impacts: Would the treatment result in other impacts related to greenhouse gas emissions and climate change that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: GHG-c, GHG-d, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact GHG-a

Impact GHG-b

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 9 HAZARDS AND HAZARDOUS MATERIALS

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-a-b: Create significant hazard from the routine transport, use, or disposal of hazardous materials or reasonably foreseeable accidents/spills?	LTS	4.9.2(a-b)						
Impact HAZ-c: Emit or handle hazardous materials within ¼ mile of a school	LTS	4.9.2(c)						
Impact HAZ-d: Located on a listed hazmat site?	NI	4.9.2(d)						
Impact HAZ-e: Create noise or safety conflicts with an airport?	NI	4.9.2(e)						
Impact HAZ-f: Interfere with an adopted emergency response plan or emergency evacuation plan?	NI	4.9.2(f)						
Impact HAZ-g: Expose people or structures to loss, injury, or death involving wildland fires?	LTS	4.9.2.(g)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hazards and Hazardous Materials Impacts: Would the treatment result in, or expose people to, other environmental hazards that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: HAZ-h, HAZ-i, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact HAZ-a, b

Impact HAZ-c

Impact HAZ-d

Impact HAZ-e

Impact HAZ-f

Impact HAZ-g

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 10 HYDROLOGY AND WATER QUALITY

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYDRO-a: violate any water quality or waste discharge standards or otherwise substantially degrade surface or ground water quality?	LTS	4.10.2(a)						
Impact HYDRO-b: Impose groundwater impacts?	NI	4.10.2(b)						
Impacts HYDRO-c-d-e-f:: Substantially alter existing drainage patterns, e.g. by altering streamcourses or installing impervious surfaces, in a way that overwhelms stormwater drainage systems, or results in on-or off-site flooding or erosion or siltation, or impedes or redirects flows?	NI	4.10.2(c-f)						
Impact HYDRO-g: Risk release of pollutants in the event of inundation?	LTS	4.10.2(g)						
Impact HYDRO-h: Conflict with an existing water quality plan or SGMP?	LTS	Impact 4.10.2(h)						
[**Impact HYDRO-i**] Diminish streamflow or aquatic community integrity by drafting water from creeks or rivers? (See SPR HYDRO-6)	LTS	Impact 4.10.2(i)						

[Impact HYDRO-j] Cause hydrological or water quality impacts through bank instability or collapse related to arundo removal?	LTSM	Impact 4.10.2(j)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hydrology and Water Quality Impacts: Would the treatment result in other hydrological impacts not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: HYDRO-i, HYDRO-j, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

[a] Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact HYDRO-a

Impact HYDRO-b

Impact HYDRO-c-f

Impact HYDRO-g

Impact HYDRO-h

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 11 LAND USE AND PLANNING

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact PLAN-a: Physically divide an established community?	NI	4.11.2(a)						
Impact PLAN-b: conflict with any land use plan or policy?	NI	4.11.2(b)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Land Use and Planning Impacts: Would the treatment result in other impacts related to conflicts with land use and planning that are not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: PLAN-c, PLAN-d, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact PLAN-a

Impact PLAN-b

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 12 MINERAL RESOURCES

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact MIN-a,b: Make unavailable a regionally valuable mineral resource or a mineral recovery site delineated on a local land use plan?	NI	4.12.2(a,b)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Mineral Resources Impacts: Would the treatment result in other impacts related to mineral resources, not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: MIN-c, MIN-d, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact MIN-a

Impact MIN-b

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 13 NOISE AND VIBRATION

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOISE-a: Cause noise in excess of standards in local noise ordinance?	NI	4.13.2(a)						
Impact NOISE-b: result in generation of excessive groundborne vibration or groundborne noise levelss	NI	4.13.2(b)						
Impact NOISE-c: near an airport (within SOI or 2 miles), expose people residing or working in the project area to excessive noise levels?	LTS	4.13.2(c)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Noise and Vibration Impacts: Would the treatment result in other noise/ vibration-related impacts that are not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion

[identify new impact(s) here, if applicable; label them: NOISE-d, NOISE-e, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact NOISE-a

Impact NOISE-b

Impact NOISE-c

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4.14 POPULATION AND HOUSING

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact POP-a: Induce substantial unplanned population growth?	NI	4.14.2(a)						
Impact POP-b: Displace substantial numbers of people, requiring construction of replacement housing elsewhere?	LTS	4.14.2(b)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Population and Housing Impacts: Would the treatment result in other impacts related to population and housing that are not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: POP-c, POP-d, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact POP-a

Impact POP-b

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 15 PUBLIC SERVICES

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact SERV-a: cause adverse impacts from providing or needing to provide new municipal services?	LTS for fire and parks, NI for all others	4.15.2(a)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Public Services Impacts: Would the treatment result in other impacts related to public services that are not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: SERV-b, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact SERV-a

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 16 RECREATION

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-a: Increase use of recreational facilities, causing their physical deterioration ?	NI	4.16.2(a)						
Impact REC-b: Harm the environment by building new or expanded recreational facilities?	NI	4.16.2(b)						
Impact REC-c: Would the project close recreational facilities temporarily or permanently, reducing the public's ability to access the park or conflicting with applicable Parks plans or regulations?	LTS	4.16.2(c)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion

[identify new impact(s) below, if any, number them: REC-d, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact REC-a

Impact REC-b

Impact REC-c

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 17 TRANSPORTATION

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact 3.15-1:conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	LTS	4.17.2(a)						
Impact TRANS-2: Result in a locally significant or sustained increase in vehicle miles traveled?	LTS	4.17.2(b)						
Impact TRANS-4: substantially increase hazards due to a transportation system use incompatible with current uses (e.g., farm equipment on a bike path)?	NI	4.17.2(c)						
Impact TRANS-4: Result in inadequate emergency access?	LTS	4.17.2(d)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion

[identify new impacts below, if applicable; number them: TRANS-e, TRANS-f, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact TRANS-a

Impact TRANS-b

Impact TRANS-c

Impact TRANS-d

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 18 TRIBAL CULTURAL RESOURCES: All impacts/checklist items have been moved into A. 4. 5, above

A. 4. 19 UTILITIES AND SERVICE SYSTEMS

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTL-a: cause relocation/construction of new/expanded water, wastewater treatment, storm water drainage, or utility/communications facilities?	NI	4.19.2(a)						
Impact UTL-b: have sufficient water supplies including in droughts?	NI	4.19.2(b)						
Impact UTL-c: increase demand for wastewater treatment beyond current treatment capacity?	NI	4.19.2(c)						
Impact UTL-d: generate solid waste in excess of State or local standards/capacity, or otherwise impair the attainment of solid waste reduction goals, **including AB 1383**?	LTS	4.19.2(d)						
Impact UTL-e: comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	NI	4.19.2(e)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Utilities/Solid Waste/Green Waste Impacts: Would the treatment result in other waste-related impacts not evaluated in the VFMP PEIR?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impacts below, if applicable; label them: UTL-f, UTL-g, etc; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact UTL-a

Impact UTL-b

Impact UTL-c

Impact UTL-d

Impact UTL-e

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

4. 20 WILDFIRE

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Impact FIRE-a: substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	4.20.2(a)						
Impact FIRE-b: exacerbate wildfire risks and thereby expose people to hazards?	LTS	4.20.2(b)						
Impact FIRE-c: require installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk?	NI	4.20.2(c)						
Impact FIRE-d: expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LTS	4.20.2(d)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Wildfire Impacts: Would the treatment result in other wildfire impacts that are not evaluated in the VFMP PEIR?	Yes	No	If yes, complete row(s) below and discussion
	☐	☐	

[identify new impacts below, if applicable; number them: FIRE-e, FIRE-f, etc.; add rows as needed]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact FIRE-a

Impact FIRE-b

Impact FIRE-c

Impact FIRE-d

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***

A. 4. 21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR [1]	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[2]	List MMs Applicable to the Treatment Project[2]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact MAND-a: substantially degrade the quality of the environment, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, or eliminate important examples of the major periods of California history or prehistory?	LTS	4.21.2(a)						
Impact MAND-b: Have impacts that are individually limited, but cumulatively considerable?	LTS	4.21.2(b)						
Impact MAND-c: Cause substantial adverse effects on human beings, either directly or indirectly?	NI	4.21.2(c)						

[1] Impact levels: NI = No impact LTS = Less than significant PS = Potentially significant LTSM = Less than significant with Mitigation SU = Significant and unavoidable [2]None: there are no SPRs and/or MMs identified in the PEIR for this impact. N/A: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Findings of Mandatory Significance: Would the treatment result in other impacts that must be analyzed under findings of mandatory significance that were not part of the CEQA code when the VFMP PEIR was written?	Yes ☐	No ☐	If yes, complete row(s) below and discussion

[identify new impact(s) below, if applicable; number them: MAND-d, MAND-e, etc; add new rows if necessary]	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

(a) Discussion of impacts listed in the PEIR that also apply to this treatment activity, ***if applicable***

Impact MAND-a

Impact MAND-b

Impact MAND-c

(b) Discussion of any new impacts from New Impacts table above, ***if applicable***