

# *Bidwell-Sacramento River State Park*

*Response to Comments and  
CEQA notices related to the  
General Plan &  
Environmental Impact Report*

*Approved by the State Park and Recreation Commission  
March 3, 2006*



# Bidwell-Sacramento River State Park

## Response to Comments and CEQA notices related to the General Plan and Environmental Impact Report

This document includes the EIR Response to Comments and CEQA notices related to the General Plan and Environmental Impact Report approved by the State Park and Recreation Commission on March 3, 2006.

The Final General Plan and Environmental Impact Report is printed as a separate document that includes the text and map revisions reflected in the Bidwell-Sacramento River State Park Recirculated Draft EIR for the Preliminary General Plan (Agricultural Resources) dated October 2005.

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# Bidwell-Sacramento River State Park

## Response to Comments and CEQA notices related to the General Plan and Environmental Impact Report

**State Clearinghouse # 2003022113**

**Approved by the State Park and Recreation Commission**

**March 3, 2006**

Arnold Schwarzenegger  
Governor

Michael Chrisman  
Secretary for Resources

Ruth Coleman  
Director of Parks and Recreation

Department of Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296-001





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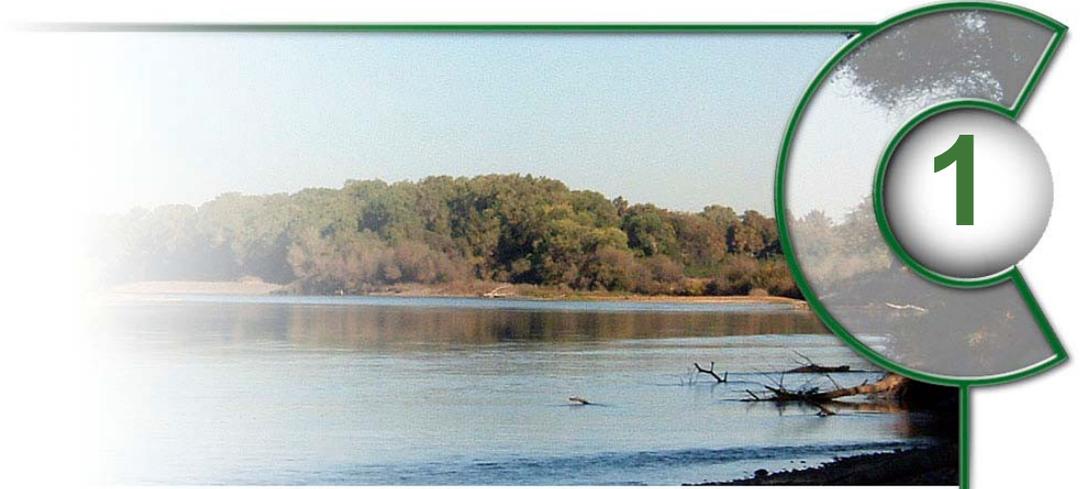
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## Introduction



## INTRODUCTION

### Planning Process

The general plan process for Bidwell-Sacramento River State Park began in early 2002, with published newsletters and meeting notices that were made available to the general public on the Department's website and mailed to approximately 50 interested individuals on our mailing lists. A set of three public meetings were held, with the first meeting on March 18, 2003 that announced the project to the public and served as a California Environmental Quality Act (CEQA) scoping meeting; the second meeting was held on July 30, 2003, when several planning alternatives were presented; and at the third and final meeting on January 15, 2004, is when the Planning Team presented the proposed General Plan and associated environmental impacts that were identified in the Preliminary General Plan/ Draft EIR.

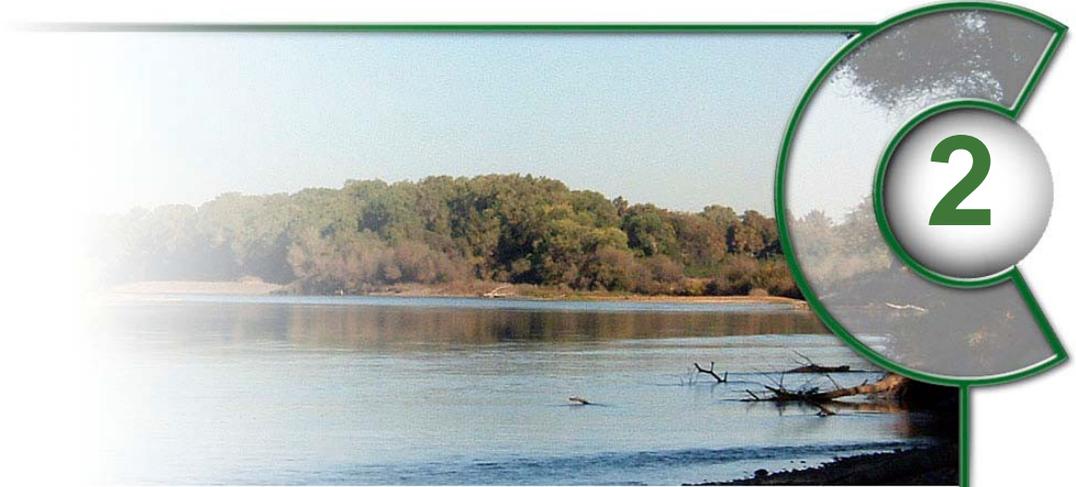
The Department originally circulated the Draft Environmental Impact Report (DEIR) for a 45-day review period, beginning on December 12, 2003 and ending on January 26, 2004, which generated seven letters during the initial CEQA review period; an additional 14 comments were noted from the January 15, 2004 public meeting and the January 15, 2004 presentation to the Sacramento River Conservation Area Forum (SRCAF) Board of Directors. Due to reconsideration of the impacts associated with the replacement of orchards with riparian vegetation, those portions of the DEIR addressing whether impacts to agricultural resources result in potentially significant environmental effects, pursuant to CEQA Guidelines section 15088.5, were revised and recirculated for additional public review.

A 30-day public review and comment period for the Recirculated DEIR was established, beginning on October 18, 2005 and ending on November 17, 2005. In response to the public interest in this issue the Department extended the public review period to January 9, 2006. The Department received four comment letters on the Recirculated DEIR which are included with responses to these letters and comments in the Final Environmental Impact Report.

The General Plan is subject to CEQA and functions as a "tiered EIR" pursuant to PRC 21093, covering general goals and objectives of the General Plan, and that the appropriate level of CEQA review will be conducted for each project relying on the approved General Plan/FEIR.

## Planning Milestones and Actions

February 21, 2003	<b>Notice of Preparation</b> of a programmatic Environmental Impact Report filed for the Bidwell-Sacramento River State Park General Plan.
March 18, 2003	<b>CEQA scoping meeting</b> announcing the project to the public.
July 30, 2003	<b>Second public meeting</b> presenting several planning alternatives.
December 12, 2003	<b>Notice of Availability</b> issued for the Preliminary General Plan / Draft Environmental Impact Report.
December 12, 2003	<b>Notice of Completion and Environmental Document Transmittal</b> submitted to the State Clearinghouse.
December 12, 2003	<b>Preliminary General Plan and Draft Environmental Impact Report</b> for Bidwell-Sacramento River State Park released to the general public and public agencies for review and comments.
January 15, 2004	<b>Third public meeting</b> presenting the proposed General Plan and associated environmental impacts.
October 17, 2005	<b>Notice of Availability</b> issued for the Recirculated Draft Environmental Impact Report for the Preliminary General Plan (Agricultural Resources).
January 2006	<b>Comments and Responses to Comments</b> on the Recirculated Draft Environmental Impact Report.
March 3, 2006	<b>California State Park and Recreation Commission</b> adopted the General Plan and Environmental Impact Report at its regular meeting in Chico, California.
March 10, 2006	<b>Notice of Determination</b> filed with the State Clearinghouse.



**Recirculated Draft Environmental Impact Report for the  
Preliminary General Plan (Agricultural Resources)**



# *Bidwell-Sacramento River State Park*

## *Recirculated Draft Environmental Impact Report for the Preliminary General Plan (Agricultural Resources)*

SCH# 2003022113

Arnold Schwarzenegger  
Governor

Mike Chrisman  
Secretary for Resources

Ruth Coleman  
Director of Parks and Recreation

Department of  
Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296-001

**October 2005**





October 17, 2005

All Interested Agencies, Organizations, and Persons

**NOTICE OF AVAILABILITY  
BIDWELL-SACRAMENTO RIVER STATE PARK PRELIMINARY GENERAL PLAN  
RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT**

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On December 12, 2003, the California Department of Parks and Recreation (Department) released to the general public and public agencies the Preliminary General Plan and Draft Environmental Impact Report (DEIR) for Bidwell-Sacramento River State Park (Park). Based on subsequent consideration of the analysis of agricultural resources included in the DEIR, a Recirculated Draft Environmental Impact Report has been prepared by the Department for the Bidwell-Sacramento River State Park General Plan. The Department is the lead agency, pursuant to the California Environmental Quality Act (CEQA), responsible for preparation of this document.

**Project Location:**

The Park is located approximately 6 miles west of the City of Chico in the northern Sacramento Valley. The Park consists of four discontinuous subunits that straddle the Sacramento River between State Route 32 and the mouth of Big Chico Creek. The Irvine Finch River Access area is located on the west side of the river in Glenn County, while the Pine Creek Landing, Indian Fishery, and Big Chico Creek Riparian Area subunits are situated east of the Sacramento River in Butte County.

**Project Description:**

The proposed project consists of the development of a new General Plan for Bidwell-Sacramento River State Park. The General Plan will guide future management direction at the Park over an approximate 20-year planning horizon. The General Plan contains a comprehensive and integrated set of park-wide goals and guidelines for the long-term management of the Park that focus on protection of environmental resources, enhancements to visitor use and opportunities, and improvements to administration and operations of the Park. In addition, the General Plan provides a spatial dimension to Park planning through the use of area concept planning, which includes area-specific management and facility prescriptions for the subunits and potential property additions that have been considered in the planning process. A range of new recreation facilities are proposed at the Park, which include, but are not limited to, overnight campgrounds, day-use areas, trails, and a visitor center.

**Summary of Impacts:**

During the public review period on the Draft EIR, a number of comments on the proposed general Plan and environmental analysis were received from public agencies, private groups, and individuals. These comments included the manner in which the DEIR analyzed the effect of the General Plan on agricultural resources. Specifically, one commenter disagreed with the conclusion made in the DEIR that the removal of orchard trees and the subsequent

restoration of riparian vegetation and/or development of low-intensity recreation uses represented a significant and unavoidable environmental impact to agricultural resources, and indicated the opinion that the use of agricultural/conservation easements could mitigate this impact to a less-than-significant level.

After additional consideration of this impact, the Department has determined that the conclusion in the DEIR was based on an incorrect effects analysis. Land use changes, including agricultural land use changes, are not, of themselves, significant adverse impacts on the physical environment. The threshold for significance is whether or not an impact to agricultural resources would then result in a significant environmental effect. Therefore, the correct finding, in this instance, is that the "conversion of designated farmland to non-agricultural uses" in the proposed Bidwell-Sacramento River SP General Plan would result in a less-than-significant significant adverse impact on the physical environment within the meaning of CEQA and the CEQA Guidelines, and thus, no mitigation measures are necessary. The evidence that supports changing the significance conclusion for this impact is based on the planned beneficial change in physical conditions of the affected properties, preservation of the soil and open space resource values attributed to agricultural lands, and the compatibility of the proposed land uses in the General Plan with agriculture and other open space uses on or adjacent to the Park.

Because of the revised conclusion regarding this issue, the Department has elected to recirculate, pursuant to the State CEQA Guidelines §15088.5, those portions of the DEIR addressing whether impacts to agricultural resources result in potentially significant environmental effects. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given but before certification; new information is considered "significant" when the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a potentially substantial adverse effect of the project (CEQA §15088.5(a)). Although the proposed revisions to DEIR result in a less-than-significant environmental impact conclusion for the subject impact topic, the Department would like to provide the public the opportunity to review the revised analysis of this issue. In addition, because the proposed revisions only affect portions of the DEIR related to agricultural resources, the recirculated DEIR only includes those portions of the document that have been modified or have a bearing the related environmental analysis, in accordance with State CEQA Guidelines §15088.5(c).

#### **Public Comment Period:**

A 30-day public review and comment period for the recirculated DEIR has been established, which begins on October 18, 2005 and ends on November 17, 2005. The shortened review has been approved in accordance with Appendix K of the CEQA Guidelines. The Department requests that reviewers limit their comments to the revised sections of the recirculated DEIR, pursuant to CEQA §15088.5(f)(2). The Department will prepare responses to comments previously submitted on the original DEIR, which are included as part of this document, so there is no need to resubmit previous comments on other sections of the DEIR that have not been revised. Responses to new comments received on the revised portions of the recirculated DEIR will also be prepared. After the close of this circulation period, the

Department will prepare a final environmental impact report that will contain comments on the recirculated DEIR and responses to significant environmental points raised in those comments, in addition to the other response to comments presented in this document. Copies of the recirculated DEIR are available for review at the Department's offices in Sacramento (see address below), the Northern Buttes District office (400 Glen Drive, Oroville CA 95966), Bidwell Mansion State Historic Park (525 The Esplanade, Chico CA 95926), and at the Chico Branch of the Butte County Library (1108 Sherman Avenue, Chico CA 95926). Electronic copies of the recirculated DEIR are also posted on the project website ([http://www.parks.ca.gov/default.asp?page\\_id=22600](http://www.parks.ca.gov/default.asp?page_id=22600)) and can be requested by contacting the Department below. Please submit comments in writing to the following address:

California Department of Parks and Recreation  
Northern Service Center  
One Capital Mall, Suite 410  
Sacramento, CA 95814  
Contact: Wayne Woodroof

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## ACRONYMS AND ABBREVIATIONS

CBDA	California Bay-Delta Authority
CDF	California Department of Fire and Forestry
CEQA	California Environmental Quality Act
CEQA Guidelines	California Environmental Quality Act Guidelines
CSLC	California State Lands Commission
DEIR	Draft Environmental Impact Report
Department	California Department of Parks and Recreation
DOC	California Department of Conservation
DPR	California Department of Parks and Recreation
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FEIR	final environmental impact report
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FPPA	Federal Farmland Policy Protection Act
GGS	giant garter snake
GIC	Geographic Information Center
HCFPD	Hamilton City Fire Protection District
LESA	Land Evaluation and Site Assessment
NEPA	National Environmental Policy Act
NRCS	Natural Resources Conservation Service
Park	Bidwell-Sacramento River State Park
PM	Public meeting
SR	State Route
SRCA	Sacramento River Conservation Area
SRCAF	Sacramento River Conservation Area Forum
TNC	The Nature Company
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

## PREFACE

This document constitutes the Recirculated Draft Environmental Impact Report (EIR) for the Bidwell-Sacramento River Preliminary General Plan. It includes a revised analysis and conclusion related to the effect of the General Plan on agricultural resources. Because of the revised conclusion regarding this issue, the Department has elected to recirculate, pursuant to the State CEQA Guidelines §15088.5, those portions of the DEIR addressing whether impacts to agricultural resources result in potentially significant environmental effects. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given but before certification; new information is considered “significant” when the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a potentially substantial adverse effect of the project (CEQA §15088.5(a)). Although the proposed revisions to DEIR result in a less-than-significant environmental impact conclusion for the subject impact topic, the Department would like to provide the public the opportunity to review the revised analysis of this issue. In addition, because the proposed revisions only affect portions of the DEIR related to agricultural resources, the recirculated DEIR only includes those portions of the document that have been modified or have a bearing on the related environmental analysis, in accordance with State CEQA Guidelines §15088.5(c).

### Public Comment Period

A 30-day public review and comment period for the recirculated DEIR has been established, which begins on October 18, 2005, and ends on November 17, 2005. The Department requests that reviewers limit their comments to the revised sections of the recirculated DEIR, pursuant to CEQA §15088.5(f)(2). The Department has prepared responses to comments previously submitted on the original DEIR, which are included as part of this document, so there is no need to resubmit previous comments on other sections of the DEIR that have not been revised. Responses to new comments received on the revised portions of the recirculated DEIR will also be prepared. After the close of this circulation period, the Department will prepare a revised final environmental impact report that will contain comments on the recirculated DEIR and responses to significant environmental points raised in those comments in addition to the other response to comments presented in this document.

Copies of the recirculated DEIR are available for review at the Department’s offices in Sacramento (see address below), the Northern Buttes District office (400 Glen Drive, Oroville CA 95966), Bidwell Mansion State Historic Park (525 The Esplanade, Chico CA 95926), and at the Chico Branch of the Butte County Library (1108 Sherman Avenue, Chico CA 95926). Electronic copies of the recirculated DEIR are also posted on the project website ([http://www.parks.ca.gov/default.asp?page\\_id=22600](http://www.parks.ca.gov/default.asp?page_id=22600)) and can be requested by contacting the Department below. Please submit comments in writing to the following address:

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One Capital Mall, Suite 410  
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# 1 INTRODUCTION

On December 12, 2003, the California Department of Parks and Recreation (Department) released to the general public and public agencies the Preliminary General Plan and Draft Environmental Impact Report (DEIR) for Bidwell-Sacramento River State Park (Park). The proposed General Plan will guide future management direction at the Park over an approximate 20-year planning horizon. It contains a comprehensive and integrated set of park-wide goals and guidelines for the long-term management of the Park that focus on protection of environmental resources, enhancements to visitor use and recreation opportunities, and improvements to administration and operations of the Park. In addition, the General Plan provides a spatial dimension to Park planning through the use of area concept planning, which includes area-specific management and facility prescriptions for the subunits and potential property additions that have been considered in the planning process. A range of new recreation facilities are proposed at the Park, which include, but are not limited to, overnight campgrounds, day-use areas, trails, and a visitor center.

The DEIR, which is part of the General Plan, contains the environmental analysis of potentially significant effects of the proposed project on the environment. Together, the DEIR and this response to comments document constitute the final environmental impact report (FEIR) for the project.

In accordance with the California Environmental Quality Act (CEQA)<sup>1</sup> §21091 and the Guidelines for Implementing the California Environmental Quality Act (CEQA Guidelines)<sup>2</sup> §15087, a 45-day public review period for the DEIR was provided ending January 26, 2004. On January 15, 2004, a public meeting was held in Chico, CA to discuss the General Plan and associated findings in the DEIR, and the public had the opportunity to provide written and oral comments. During the public review period, a number of comments on the environmental issues evaluated in the DEIR were received from public agencies, private groups, and individuals. In addition, comments were also received on the various components of the plan itself. This document provides responses to written and oral comments received during the 45-day public review period.

## Impacts Due to the Conversion of Agricultural Land

For several reasons, the Department has re-evaluated its finding of a significant and unavoidable impact on agricultural resources. As explained below, based on comments from reviewers and a new policy guidance memorandum from the Resources Agency, the Department has changed its finding on the conversion of agricultural land to less than significant.

A number of public comments were provided that addressed the manner in which the DEIR analyzed the effect of the General Plan on agricultural resources. Specifically, one

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<sup>1</sup> Public Resources Code §§21000-21178.

<sup>2</sup> Title 14, California Code of Regulations, §§15000-15387.

commenter disagreed with the conclusion made in the DEIR that the removal of orchard trees and the subsequent restoration of riparian vegetation and/or development of low-intensity recreation uses represented a significant and *unavoidable* environmental impact to agricultural resources, and indicated the opinion that the use of agricultural/conservation easements could mitigate this impact to a less-than-significant level (Lynnel Pollock, Yolo County, presented at Sacramento River Conservation Area Forum meeting on January 15, 2004).

The environmental analysis in the DEIR had found that the proposed acquisition of two properties (Singh and Beard properties), due to their status as *Important Farmland* under the Farmland Mapping and Monitoring Program (FMMP) administered by the California Department of Conservation (DOC) and the ultimate change in land use on these properties from agriculture to habitat restoration and joint habitat restoration/low-intensity recreation uses in a rural setting constituted a significant environmental impact on agricultural resources, pursuant to the State CEQA Guidelines. Further, because the Department has determined that feasible mitigation measures were not available, the original DEIR indicated that the effect represented a significant and unavoidable environmental impact.

After additional consideration of this impact, the Department has determined that the conclusion in the DEIR was based on an incorrect effects analysis. Land use changes, including agricultural land use changes, are not in of themselves significant adverse impacts on the physical environment. The threshold for significance is whether or not an impact to agricultural resources would then result in a significant environmental effect. Therefore, the Department finds, in this instance, that the “conversion of designated farmland to non-agricultural uses” in the proposed Bidwell-Sacramento River State Park General Plan would result in a less-than-significant adverse impact on the physical environment within the meaning of CEQA and the CEQA Guidelines, and thus, no mitigation measures are necessary. The evidence that supports changing the significance conclusion for this impact is based on the planned beneficial change in physical conditions of the affected properties, preservation of the soil and open space resource values attributed to agricultural lands, and the compatibility of the proposed land uses in the General Plan with agriculture and other open space uses on or adjacent to the Park.

Since the time the DEIR was released to the public, the Department has acquired an additional property (Brayton property), which is being integrated into the proposed General Plan. The Brayton property, proposed for low-intensity recreation uses similar to the Beard property, has been historically in orchard production, but it is not designated as Important Farmland (i.e., Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance under the FMMP). In addition, the eastern portion of the proposed Sunset Ranch property addition is considered Important Farmland by virtue of its designation as “irrigated farmland” in Butte County, but that point was not referenced in the initial DEIR. (Note that for farmed areas lacking modern soil survey information, as is the case in Butte County, and for which there is expressed local concern on the status of farmland, areas classified as “irrigated farmland” and “non-irrigated farmland” under the

FMMP substitute for the Important Farmland categories.) Therefore, the discussion provided in this Final EIR also applies to both of these properties.

Also subsequent to the DEIR, the Resources Agency provided a guidance memorandum to its Departments encouraging Departments to consider, as a matter of policy, including a separate section in Environmental Impact Reports (EIRs) regarding socioeconomic impacts (Resources Agency Memo, May 4, 2005). The CEQA Guidelines permit inclusion of such a separate section at an agency's discretion (CEQA Guidelines §15131, "Economic or social information may be included in an EIR or may be presented in whatever form the agency desires." Emphasis added.) In addition, the Resource Agency Memo referenced the CALFED strategies for agricultural land and water as "good examples of the types of strategies which could be used." Here, to reflect the Department's sensitivity to agricultural land concerns, the General Plan contains a goal and guideline to consider and implement, as appropriate, measures based on the CALFED strategies. Those policy measures and socioeconomic considerations are reflected in this FEIR.

## Document Organization

All comments on the Preliminary General Plan and DEIR, and the responses thereto, are presented in this document, which is organized as follows:

- < Chapter 1 (Introduction) provides a brief overview of the proposed project, describes the requirements under CEQA for responding to public comments received on the DEIR, and describes the organization of the FEIR.
- < Chapter 2 (List of Commenters) provides a list, in table format, of all written and oral comments received on the Preliminary General Plan and DEIR.
- < Chapter 3 (Response to Comments) provides a summary of, and responses to, written and oral comments on the Preliminary General Plan and DEIR received during the public review period, which lasted from December 12, 2003 to January 26, 2004.
- < Chapter 4 provides an errata, which consists of a reproduction of portions of the Preliminary General Plan and DEIR with revisions to text and graphics made either in response to comments or based on Department staff-directed changes that were made to update, clarify, and/or otherwise revise the document.
- < Chapter 5 provides new references supporting information presented in this FEIR.

The focus of the response to comments is on the disposition of significant environmental issues that have been raised in the comments, as specified by State CEQA Guidelines §15088(b), but also includes responses to pertinent planning considerations for implementation of the proposed General Plan.

## 2 LIST OF COMMENTERS

This chapter provides a list of all public comments received on the Preliminary General Plan/DEIR during the public review period, which ended on January 26, 2004. Section 2.1 focuses on written comments (i.e., letters, comment forms, and e-mail correspondence), and provides a table indicating the commenter/agency that prepared written comments, the date the comment(s) were made, individual comment numbers, and the topic(s) raised in the comment (see Table 2-1). Section 2.2 and Table 2-2 provides similar information related to oral comments provided at the January 15, 2004 public meeting. Responses to each individual comment are numbered correspondingly and are included in Chapter 3.

### 2.1 LIST OF WRITTEN COMMENTS RECEIVED ON THE PRELIMINARY GENERAL PLAN AND DEIR

Table 2-1 indicates the letter number, commenter, date of correspondence, comment number assigned, and the comment topic assigned for each written comment received on the Preliminary General Plan and DEIR. The letters are numbered sequentially by date received. The letter numbers are then used as a prefix for individual comments, which are also number sequentially after the prefix. For example, comment 1-1 is the first comment of letter 1; comment 1-2 is the second comment of the same letter, etc.

<b>Table 2-1 Written Comments Received on the Preliminary General Plan and DEIR</b>				
Letter	Commenter/Agency	Date	Comment Number	Topic(s)
1	D.G. Bungarz, Glenn County Board of Supervisors	January 9, 2004	1.1	Project Description
			1.2	Public Services (Fire Protection)
			1.3	Economic Development
			1.4	Project Description/Alternatives
2	Stephen L. Jenkins, California State Lands Commission	January 12, 2004	2.1	Agency Jurisdiction
			2.2	Permit Requirements
3	Ed McLaughlin, Chico Velo Club	January 14, 2004	3.1	Project Description (Recreation/Trails)

Table 2-1 Written Comments Received on the Preliminary General Plan and DEIR				
Letter	Commenter/Agency	Date	Comment Number	Topic(s)
4	Mike Crump, Butte County Public Works Department	January 21, 2004	4.1	Project Description (Road Realignment)
			4.2	Project Description (Bank Stabilization)
			4.3	Project Description (Recreation/River Access)
5	Sterling Sorenson, California Department of Water Resources	January 21, 2004	5.1	Agency Jurisdiction
			5.2	Permitting Requirements
			5.3	Permitting Requirements
6	John Merz, Sacramento River Preservation Trust	January 26, 2004	6.1	Park Boundaries
			6.2	Public Involvement
			6.3	Project Description (Planning Area)
			6.4	Base Mapping
			6.5	Project Description (Park Features)
			6.6	Agricultural Resources
			6.7	Floodplains
			6.8	Planning Influences (SRCA)
			6.9	Public Land Ownership
			6.10	Project Description (Planning Area)
			6.11	Project Description (Facility Locations)
			6.12	Project Description (Vision Statement)
			6.13	Project Description (Trail System)
			6.14	Project Alternatives
6.15	Project Alternatives			
6.16	Project Schedule			

Letter	Commenter/Agency	Date	Comment Number	Topic(s)
7	Jim Dwyer	<i>undated</i>	7.1	Project Description
			7.2	Project Description (Planning Area)
			7.3	Project Description (Vision Statement)
			7.4	Project Description ("Spirit of Place")
			7.5	Project Description (Boat Launch Facilities)
			7.6	Project Description (Campgrounds)
			7.7	Public Safety
			7.8	Project Description (Trail System)
			7.9	Project Description (Visitor Center)
			7.10	Project Description (Concessionaire Services)
			7.11	Project Alternatives
			7.12	Cumulative Impacts

## **2.2 LIST OF PUBLIC MEETING COMMENTS RECEIVED ON THE PRELIMINARY GENERAL PLAN AND DEIR**

A public meeting on the Preliminary General Plan and DEIR was held on January 15, 2004 in the City of Chico, California. In addition, there was an informal presentation made to the Sacramento River Conservation Area Forum (SRCAF) Board of Directors on the same date, where comments were noted. These venues served as open forums where the public and SRCA Board members could comment on the proposed General Plan and associated environmental analysis. For each oral comment received at these meetings, Table 2-2 indicates the commenter number, commenter name (if available), comment number assigned, and the comment topic(s). Public meeting comments are given a "PM" prefix to distinguish them from written comments.

<b>Table 2-2</b>		
<b>Oral Comments Received on the Preliminary General Plan and DEIR</b>		
<b>Comment Number</b>	<b>Commenter/Agency</b>	<b>Topic(s)</b>
<b>Public Meeting (Chico, CA)</b>		
PM1-1	<i>General Public</i>	Project Description (Planning Area)
PM1-2	<i>General Public</i>	Project Description (Vision Statement)
PM1-3	<i>General Public</i>	Project Description (Facility Development)
PM1-4	<i>General Public</i>	Project Description (Campgrounds)
PM1-5	<i>General Public</i>	Project Description (Property Ownership)
PM1-6	<i>General Public</i>	Project Description (Trail System)
PM1-7	<i>General Public</i>	Project Description (Vision Statement)
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PM1-10	<i>General Public</i>	Project Description (Road Realignment)
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PM1-12	<i>General Public</i>	Project Description (Hydrology)
<b>SRCAF Board Meeting (Willows, CA)</b>		
PM2-1	Lynnel Pollock (Yolo County)	Agricultural Resources
PM2-2	<i>General Public</i>	Agricultural Resources

### 3 RESPONSE TO COMMENTS

This chapter provides a complete copy of the written comments and summary of oral comments received on the Preliminary General Plan/DEIR for Bidwell-Sacramento River State Park, and presents responses to significant environmental issues raised in the comments, as required by State CEQA Guidelines §15132, as well as comments pertaining to the proposed General Plan.

The first section of this chapter focuses on written comments received on the Preliminary General Plan/DEIR, including letters, comment forms, and e-mail correspondence. Each letter is reproduced in its entirety, including attachments. Each letter and comments are labeled numerically, and correspond to Table 2-1. The responses to comments are also labeled numerically and follow each letter.

Following the responses to written comments, there is a detailed summary of oral comments provided at the two meetings held on January 15, 2004, including the public meeting held in Chico, CA and the SRCAF Board meeting held in Willows, CA. Oral comments presented at the public meeting are assigned a "PM1" prefix followed by the number of the comment, and correspond to Table 2-2; similarly oral comments given at the SRCAF meeting are assigned a "PM2" prefix. Responses to the oral comments follow the public meeting summaries.



## GLENN COUNTY BOARD OF SUPERVISORS

Glenn County Board of Equalization  
Air Pollution Control District

January 9, 2004

California Department of Parks and Recreation  
Attention: Wayne Woodroof  
Northern Service Center  
One Capital Mall, Suite 500  
Sacramento, CA 95814

Thank you for the opportunity to review the Bidwell-Sacramento River State Park Preliminary General Plan/Draft Environmental Impact Report.

The Irvine Finch River Access area is located on the west side of the Sacramento River in Glenn County. We support the proposed plan for the Irvine Finch Recreation Area as stated on page ES-4 which include the following:

- *Regular maintenance of the Irvine Finch boat ramp to accommodate larger vessels.*
- *New overnight campground, including family and group campsites, at the Beard Addition.*
- *Parking expansion to serve day-users, boaters, and overnight campers.*

Page 2-85 includes a discussion of Fire Protection. The Hamilton City Fire Protection District is responsible for this area. This is an all volunteer district and has financial difficulties and difficulty attracting volunteers. Direct support to the Hamilton City Fire Protection District would help to maintain this Fire Protection District and the volunteer force. Page 4-25 stated that "There are no known capacity issues that would affect the provision of these services for the Park." This would be true if park personnel provide all services.

The addition of a campground to the Irvine Finch facility (Page 3-35) would assist economic development efforts in Glenn County.

The County is opposed to the Maximum Restoration Alternative described on page 4-32. This type of restoration activity will be undertaken by other agencies and the mission of the State Department of Parks and Recreation is to provide for recreational activities.

Thank again for the opportunity to comment on this Plan and Draft EIR.

Yours truly,

**GLENN COUNTY BOARD OF SUPERVISORS**

  
\_\_\_\_\_  
D.G. Bungarz, Chairman

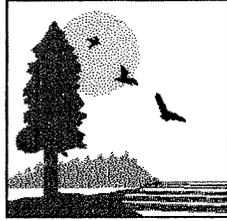
## Letter 1: D.G. Bungarz, Glenn County Board of Supervisors

January 9, 2004

- 1.1 The commenter expresses support for the proposed development planned at the Irvine Finch River Access area. This comment is noted, and no further response is necessary.
- 1.2 The commenter states that that the Hamilton City Fire Protection District may have difficulties servicing the Park without direct support from the Department due to financial difficulties and lack of volunteers. The Department acknowledges the stated problems surrounding the Hamilton City Fire Protection District. However, it is not financially feasible for the Department to offer direct support to the District. The General Plan does address local fire protection and emergency services at the Park, and Goal AO-2.3 and Guideline AO-2.3-1 would ensure cooperation and coordination between the Department and the District in the provision of adequate fire protection and emergency medical services. To the extent that service levels provided by the District are limited, it should be noted that the Park also relies on fire-fighting services from the California Department of Fire and Forestry (CDF), as well as internal Department staff, which have experience in handling rural (non-structural) fire incidents that would be more common at the Park; therefore, there are no known fire protection service capacity issues that would affect the Park and the conclusions on page 4-25 of the DEIR remain valid. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to text on pages 2-58 and 4-25 of the Preliminary General Plan/DEIR that clarify these points.
- 1.3 The commenter states that the addition of a campground at the Irvine Finch facility would assist the economic development efforts of Glenn County. The General Plan proposes the development of a campground south of the existing Irvine Finch subunit on the Beard property addition (or other appropriate locations base on site-selection criteria). This comment is noted, and no further response is necessary.
- 1.4 The commenter states that they are opposed to the Maximum Restoration Alternative. This comment is noted. Based on CEQA, this alternative was developed for the purposes of addressing potential environmental effects associated with the proposed General Plan. However, the Maximum Restoration Alternative does not meet one of the key objectives of the Department, namely the provision of “high-quality recreation to residents of the State,” and is not selected as the preferred General Plan alternative.

**CALIFORNIA STATE LANDS COMMISSION**

100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825-8202

**PAUL D. THAYER, Executive Officer**

(916) 574-1800 FAX (916) 574-1810

California Relay Service From TDD Phone 1-800-735-2922  
from Voice Phone 1-800-735-2929

**Contact Phone: (916) 574-1890**

**Contact FAX: (916) 574-1885**

January 12, 2004

File Ref: SCH# 2003022113;  
PRC 6987.9

Ms. Nadell Gayou  
The Resources Agency  
901 P Street  
Sacramento, CA 95814

Mr. Wayne Woodroof  
California Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, CA 95814

**SUBJECT: Preliminary General Plan and Draft Environmental Impact  
Report for the Bidwell-Sacramento River State Park**

Dear Ms. Gayou and Mr. Woodroof:

Staff of the California State Lands Commission (CSLC or Commission) has reviewed the subject document. The CSLC is a Responsible Agency under the California Environmental Quality Act. We offer the following comments.

The State acquired sovereign ownership of all tidelands and submerged lands and beds of navigable waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all the people of the State for statewide Public Trust purposes which include waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. The landward boundaries of the State's sovereign interests in areas that are subject to tidal action are generally based upon the ordinary high water marks of these waterways as they last naturally existed. In non-tidal navigable waterways, the State holds a fee ownership in the bed of the waterway between the two ordinary low water marks as they last naturally existed. The entire non-tidal navigable waterway between the ordinary high water marks is subject to the Public Trust. The State's sovereign interests are under the jurisdiction of the CSLC.

Ms. Nadell Gayou  
Mr. Wayne Woodroof  
Page 2

The Sacramento River at this location is State-owned sovereign land under the jurisdiction of the Commission. The California Department of Parks and Recreation's boat launch facility is located in the Sacramento River and is under the CSLC lease PRC 6987.9. To the extent the proposed project involves changes or improvements to that which is authorized under the existing lease, approval from the Commission is required. Please contact Lorna Burks, Public Land Management Specialist at (916) 574-1822 for information concerning the Commission's leasing requirements.

Sincerely,



Stephen L. Jenkins, Assistant Chief  
Environmental Planning and  
Management Division

Cc: Lorna Burks

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## Letter 2: Stephen L. Jenkins, California State Lands Commission

January 12, 2004

- 2.1 The commenter describes the jurisdiction of the California State Lands Commission (CSLC). Specifically, the CSLC holds fee ownership to the bed of non-tidal navigable waterways between the two ordinary low water marks as they last naturally existed, and the entire non-tidal navigable waterway between the ordinary high water marks is subject to the Public Trust. This comment is noted, and no further response is necessary.
- 2.2 The commenter notes that the existing boat launch facilities on the Sacramento River at the Park are under the jurisdiction of the CSLC, and therefore, future improvements or changes to these facilities are subject to applicable permit requirements of the CSLC. The Department acknowledges the permitting authority of the CSLC and will acquire any necessary permits prior to any improvements or changes at facilities under the jurisdiction of the CSLC. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to text on page 3-12 of the Preliminary General Plan/DEIR that reflect the jurisdiction of the California State Lands Commission over existing and proposed boat launch facilities at the Park.

>>>> Ed <[ed@chicovelo.org](mailto:ed@chicovelo.org)> 01/14/04 12:26 PM >>>

> Hello Michael,  
> I've been getting some email re the General Plan for this park from  
> folks  
> concerned that mtn bike riding might be prohibited if no input is  
> received.  
> Can I get a brief summary of the accessibility for bikes on trails in  
> this  
> area?  
> Thanks,  
> Ed McLaughlin  
> Gen Mgr  
> Chico Velo Club  
> 343 8356  
>  
>

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**Letter 3: Ed McLaughlin, General Manager, Chico Velo Club**

**January 14, 2004**

- 3.1 The commenter requests information pertaining to the treatment of bicycle accessibility on trails in the General Plan. Generally, the Department supports the concept of multi-use trails, including allowing bicycling within State Parks. The proposed General Plan supports this concept as well, but retains flexibility in future trails planning efforts through Guideline VU-3.4-4, which calls for an evaluation of the suitability of existing and proposed trail systems for multiple uses, including bicycling, in consideration of public safety and environmental factors. The appropriateness of bicycling on trails would likely be determined based on such considerations as facility design, recreational opportunity, erosion, protection of biological resources, public safety, and maintenance costs. Due to these variables, the proposed General Plan does not specifically allow or restrict bike use on trails. Rather, the decision would be made at the time that the Department develops new trails or upon a specific evaluation of existing trails for multiple use or limited use by distinct user groups, which would occur through separate planning and/or management processes. This issue could also be addressed as part of a Trails Management Plan if such a plan is developed for the Park in the future.



**Bidwell-Sacramento River State Park  
General Plan & EIR**

**Bidwell-Sacramento River State Park  
PRELIMINARY GENERAL PLAN & DRAFT EIR COMMENTS**

(please hand in to State Parks staff during the meeting or mail back by January 26, 2004)

Name: Mike Crump, Director Butte County Public Works  
Organization (if any): Butte County  
Address (optional): 7 County Center Drive  
City, State, Zip: Oroville CA 95965

The California Department of Parks and Recreation (State Parks) has prepared a General Plan and Environmental Impact Report (EIR) for Bidwell-Sacramento River State Park. State Parks invites you to provide specific comments on the proposed General Plan and Draft Environmental Impact Report (DEIR). Your comments will be considered in the finalization of the proposed General Plan and DEIR.

Please feel free to provide any additional information which you believe should be incorporated into the Preliminary General Plan. Please identify what the issue is and the person we should contact about it. Thank you!

**Overall Comments:**

The Plan should have a general discussion (on goal?) to seek a cooperative project between the State and County to relocate that section of River Road that runs parallel and adjacent to the Sacramento River just north of the Washart area.

This would allow 2 things to occur. The first would be to relocate the County road away from the river and reduce or eliminate the need to protect this public facility through rip rapping or other hard structure. The second would be to allow room and access that is directly adjacent to the river that could be used for passive "river watching" and could be ADA accessible.

Mike Crump

## Letter 4: Mike Crump, Butte County Public Works Department

January 21, 2004

- 4.1 The commenter states that the proposed General Plan should have a discussion and/or goal related to the realignment of River Road just north of the Big Chico Creek Riparian Area. The proposed general Plan specifically addresses this issue through Guideline VU-3.1-4, which states that the Department will “work with Butte County in exploring opportunities for the realignment of River Road near the Big Chico Creek Riparian Area complex to facilitate visitor access.”
- 4.2 The commenter states that the realignment of River Road would reduce or eliminate the need to protect this roadway from rip-rapping or other hard structure. This comment is noted and is one of the primary factors that the Department supports realignment of this roadway in Guideline VU-3.1-4. Further, the Department also concurs that bank stabilization features (e.g., rip-rap) in the Sacramento River channel should be minimized as described in Guideline ER-3.1-2. The area north of the washout at the Big Chico Creek Riparian Area experiences substantial bank erosion and is considered appropriate for natural river meandering.
- 4.3 The commenter also acknowledges that the realignment of River Road would promote passive recreation opportunities and could be ADA accessible. This comment is noted and complements the text in the Guideline VU-3.1-4 of the General Plan that states that roadway realignment would facilitate visitor access.

February 26, 2003

Wayne O. Woodroof  
Department of Parks and Recreation  
One Capitol Mall, Suite 500  
Sacramento, California 95814

Staff for The Department of Water Resources has reviewed State Clearinghouse Document 2003022113, Bidwell-Sacramento River State Park General Plan and provides the following comments:

A portion of your project is adjacent to the Sacramento River Designated Floodway, a regulated stream, over which The Reclamation Board has jurisdiction and exercises authority. The California Code of Regulations, Title 23, Waters, Article 3, require that a Board permit be obtained before the start of any work including excavation and construction activities where The Reclamation Board has jurisdiction.

Section 8(b)(2) of the Regulations states that applications for permits submitted to the Board must include a completed environmental questionnaire that accompanies the application and a copy of any environmental documents if they are prepared for the project. For any foreseeable significant environmental impacts, mitigation for such impacts shall be proposed. Applications are reviewed for compliance with the California Environmental Quality Act.

Section 8(b)(4) of the Regulations states that additional information, such as geotechnical exploration, soil testing, hydraulic or sediment transport studies, biological surveys, environmental surveys and other analyses may be required at any time prior to Board action on the application.

If you have any questions, please contact me at (916) 653-0402, or Samuel Brandon at (916) 653-6491.

Sincerely,

Original Signed By:  
Sterling Soronson  
Water Resources Engineering Associate  
Floodway Protection Section

cc: Richard Marshall, Chief  
Flood Project Inspection Section  
3310 El Camino Avenue, Room B-20  
Sacramento CA 95821

## Letter 5: Sterling Sorenson, California Department of Water Resources

January 21, 2004

- 5.1 The commenter states that a portion of the Park is under the jurisdiction of the Reclamation Board, and therefore, any future work including excavation and construction on lands subject to the Reclamation Board's authority would require a permit. The Department acknowledges that the Reclamation Board has jurisdiction over portions of the Park, and a permit will be sought for all future work in these areas subject to permit requirements. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to text on pages 3-12 and 3-30 (Goal AO-4.5-1) of the General Plan, which are revised to reflect the jurisdiction of the California Department of Water Resources/Reclamation Board.
- 5.2 The commenter states that all application(s) for permits from the Reclamation Board must include a completed environmental questionnaire. This comment is noted. The Department is committed to compliance with established laws, regulations, and permitting requirements. This General Plan EIR provides the first tier of environmental review and other environmental documents will be based on this review. Future implementation of projects proposed at Bidwell-Sacramento River State Park would require detailed project-specific environmental compliance documents (see page 1-7 of the General Plan). When permits from the California Department of Water Resources are required for future projects, the associated environmental documentation and information will be submitted with permit applications.
- 5.3 The commenter states that permit applications may require additional environmental testing and/or surveys. This comment is noted. Much of this type of information will be developed as part of future environmental compliance efforts for new projects. Supplemental information that is required for all permit applications will be generated and submitted to the applicable agencies.



January 26, 2004

California Department of Parks and Recreation  
Northern Service Center  
One Capital Mall, Suite 500  
Sacramento, CA 95814  
Attn: Wayne Woodroof

Dear Mr. Woodroof:

The Sacramento River Preservation Trust (Trust) has reviewed the Bidwell-Sacramento River State Park (Park) Preliminary General Plan & Draft Environmental Impact Report and would like to make the following comments.

1. On pages 1-1 and 1-3, in discussing the acquisition and history of the Park, there is reference to "... possible overlapping areas in deeds and conveyances..." The Trust is aware of several surveys that have been done to try to resolve this issue, especially in terms of trying to clarify the jurisdiction of Butte County. Some discussion concerning this issue would be appreciated, including a statement addressing the current status of Park boundaries.
2. On page 1-6 (Public Involvement), it states, "Public Involvement is an important component of the General Planning process." It then goes on to discuss a range of methods that have been used to engage the public in the planning process. What is missing, however, is a list of which methods were used, when they were used, and most importantly of all, who responded and what their responses were. Please provide a listing of all responses received to date, both public agencies and private organizations/ individuals, including copies of all written responses. The Trust strongly suggests that this information be included as an appendix in the Final GP and EIR.
3. The Trust found the photographic detail provided in Exhibits 2-1A through 2-1D to be very helpful. However, the Trust would like to request that 2-1D either be expanded southerly to the mouth of Stony Creek (River Mile 190) or that an additional Exhibit be provided that shows the landscape between River Mile 193 (which is where the current map ends) and River Mile 190. There are several reasons for this, the most important being the ability to show the referenced "Pine Creek Preserve" that is discussed on page 2-92.

On a related note, while each of the photographic Exhibits in the document carries a December 3, 2003 date, the underlying photo is older than that (1999?). Please clarify what date the base photo was taken and explain why a more recent photo wasn't used. For a variety of reasons, the Trust believes a better sense of what is out on the ground

now would add credence to the word "existing" when discussing Existing Conditions and Issues.

4. Specific to Exhibit 2-1D, there is an identified "Historic Chico Landing Site (Approximate)". In the Indian Fishery discussion, on page 2-17, there is reference to the "Old Chico Landing Area". What is the difference (if any) between the two references and the significance of each?
  5. Exhibit 2-4 has three shades of green associated with important farmland classifications shown in the key, yet the Trust is only able to identify two shades, one Prime Farmland, the other Farmland of Local Potential. Not sure what to suggest here, perhaps a numbering system, but, clarification of where any Farmland of Statewide Importance might be located is hereby requested.
  6. Exhibit 2-5 has two shades of blue, while the key only shows one (which appears to be the darker of the two shades and appears to represent the 100-year Floodplain). What does the lighter shade of blue represent? In addition, the inside curve of Jenny Lind Bend is represented as not being in a floodplain at all. The Trust knows this is incorrect from personal observation of the landscape. Please clarify.
  7. In discussing the Sacramento River Conservation Area (page 2-88), the Sacramento River Conservation Area Forum (SRCAF) is described as a "...conglomeration of local, state, federal, and private organizations..." This is not correct, as the SRCAF is a private, non-profit organization made up of both landowner and public interest representatives appointed by the seven northern California counties (from Yolo and Sutter in the south to Shasta in the north), one representative from the State Resources Agency and six non-voting agency representatives, three state and three federal. The SCRAF, however, is a focal point for any number of agencies, organizations, and individuals who are concerned about the development of the Sacramento River Conservation Area. The Trust strongly recommends a rewrite of this section.
  8. As highlighted in #3 above, Exhibit 2-10 is really incomplete in terms of total impact without the inclusion of both public and private lands that lie between the US Fish and Wildlife Service property south of Road 23 and Stony Creek. As requested above, please expand this Exhibit to include these lands.
  9. Section 2.4.8 Property Acquisition/Park Expansion is very brief, yet the Trust believes that a comprehensive discussion of the potential for Park expansion should be a critical component of this process. The use of Area Concept Planning (see section 3.3.2) was valuable as far as it went, but the Trust believes that it did not go far enough. Discussion of the "Pine Creek Preserve" (see #3 above) was a welcome addition to the process, but the Trust believes that all lands north of Big Chico Creek (up to Highway 32) and east of the current Park to Kusal Slough (Rock Creek) should have been analyzed. Some discussion of why this was not done is hereby requested.
  10. In looking at Exhibit 3-1, the Trust notes that all facilities and trails identified on the map "represent general locations only". This is important due to the number of interrelated planning activities that are occurring in the area by both public agencies and private parties (see pages 2-88 through 2-94). The Trust looks forward to the Department of Parks and Recreation's continuing involvement in these related discussions.
  11. In reviewing the proposed Vision Statement (section 3.1.2), the third paragraph includes a statement that, "The River will be allowed to meander, to the extent compatible with
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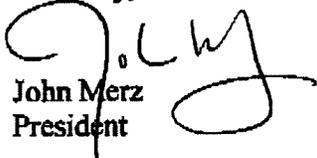
existing land uses.” What does this mean exactly, especially in terms of potential impacts to lands within the Park itself?

12. In discussing potential facilities at the Indian Fishery subunit (page 3-38), mention is made of a loop trail that “could be expanded to the south of the existing alignment, thereby providing access to the dense riparian vegetation that characterizes the essence of the Park.” The Trust opposes this particular recommendation because of what the sentence says, believing that it is important to ensure that Park facilities do not compromise the integrity of the ecosystem being protected. In its place, the Trust suggests that two lineal trails (as represented on Exhibit 2-1C) be pursued. Both would provide access to the River, one from the abandoned boat launch and the other from the current Administrative Center through Department of Fish and Game lands (the so-called Allinger property). Both of these trails have existed to some extent for years and, the Trust believes, would not be as disruptive as the loop trail that is proposed.
13. In discussing the Environmentally Superior Alternative (section 4.8.2), it is noted that the Maximum Restoration Alternative is the environmentally superior alternative from the alternatives considered. However, it is then stated “this alternative fails to meet one of the fundamental objectives of the Department, which is to provide high-quality recreation to the residents of the State... As a result, it was excluded from further consideration in the planning process.” The last paragraph of the section then goes on to state “the proposed General Plan was selected...” To begin with, the proposed General Plan was selected to be what? The Trust sees no reference to a Preferred Alternative anywhere in the document. Is this the answer? If not, please identify the Preferred Alternative and explain why it is such. Secondly, the Trust would like to point out that the State Park Classification (see page 2-1) states “Improvements may be undertaken in State Parks to make these resources and the recreational opportunities that they provide available to the public,” (emphasis added). The Park was designated as a State Park (as opposed to a State Recreation Area) for a reason and the Trust sincerely hopes that the preservation and protection of the “outstanding natural, cultural and scenic resources” of the Park are paramount in any planning effort affecting it. That having been said, please explain what “excluded from further consideration in the planning process” meant in terms of an examination of the Maximum Restoration Alternative.

The Trust appreciates having had the opportunity to comment and looks forward to your response. Some sense of when we can expect to hear back would be appreciated. We would also request at this time to be notified of when the final General Plan and EIR will be presented to the State Parks and Recreation Commission.

Sincerely,

John Merz  
President



## Letter 6: John Merz, Sacramento River Preservation Trust

January 26, 2004

- 6.1 The commenter is seeking information and clarification regarding Park boundaries and status of current survey efforts. The Department and Butte County have engaged in discussions to resolve survey and boundary issues pertaining to the area of the Park along River Road. The County has proceeded to survey the area along River Road south of West Sacramento Avenue in order to establish mutually-agreeable boundaries for the River Road right-of-way and for properties owned by the State as part of the Bidwell-Sacramento River Park. The Butte County Department of Public Works has recently provided additional information to the Department regarding their anticipated costs to survey the remaining area(s) along River Road, north of West Sacramento Avenue. The Department is currently considering this proposed cost to determine if it can be supported within the current budget. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to text on pages 1-3 and 3-23 of the General Plan that are intended to clarify the historic and current property boundary issue.
- 6.2 The commenter is seeking a more detailed description of the public involvement process associated with the development of the General Plan. The public involvement process included a set of three public meetings. The first meeting (March 18, 2003) focused on announcing the project to the public and served as a CEQA scoping meeting. The second meeting (July 30, 2003) focused on presentation of several planning alternatives. The third and final meeting (January 15, 2004) presented the proposed General Plan and associated environmental impacts identified in the DEIR component of the Plan. As part of the public involvement process, information on the planning process was provided via newsletters and was available online on the project website. Moreover, input from the general public and public agencies was solicited via oral comments, hard-copy comment forms, and online surveys. This information was compiled and considered by the Department within the planning process and is part of the public record for the project. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to page 1-6 of the General Plan that are intended to provide more detail on the public involvement process.
- 6.3 The commenter suggests that Exhibit 2-1D be expanded to the south to show the "Pine Creek Preserve" concept that extends to the area between River Mile 193 and 190. A new exhibit (Exhibit 2-11) has been added to the General Plan, which shows the Pine Creek Preserve concept that was developed by The Nature Conservancy in their

*Sacramento River Public Recreation Access Study*. Please refer to Chapter 4, Recommended Changes to the General Plan, for this new exhibit.

- 6.4 The commenter seeks clarification on the date of the aerial photograph used for the base maps used throughout the text and why a newer image was not used. The date of the base map photography used in the General Plan is 1999, and will be referenced on all of the exhibits that use this base map. This photography was obtained from the Geographic Information Center (GIC) at Chico State University, which was hired to develop a base set of GIS data for the Park, and was the most available and recent aerial photography for the Park at the time of their work efforts. Although this photography is dated by several years, the information included in Chapter 2, Existing Conditions, is intended to reflect the current conditions at the park at the time the General Plan was prepared.
- 6.5 The commenter is seeking clarification between the “Historic Chico Landing Site” identified on Exhibit 2-1D and the “Old Chico Landing Area” referenced as part of the Indian Fishery subunit. These two locations are one and the same, but have been mapped by different sources at different locations, most likely because of the natural meander of the Sacramento River. The located depicted on Exhibit 2-1D is based on archival mapping, while the location at Indian Fishery is based on U.S. Geological Survey (USGS) topographic maps.
- 6.6 The commenter seeks clarification on the location of “Farmland of Statewide Importance” on Exhibit 2-4 (Designated Farmland). The FMMP is administered by the California Department of Conservation, and classifies farmland throughout the state based on a system that includes seven main classification categories and two interim categories where modern soil survey information is not available. Only those categories that appear in the project area are shown in the legend of the exhibit. The area designated as “Farmland of Statewide Importance” is located directly west of the Singh property and north of the area designated as “Farmland of Local Importance.”
- 6.7 The commenter is seeking clarification of the floodplain mapping as shown in Exhibit 2-5, specifically the different shading that appears on the exhibit. Floodplain maps are prepared by the Federal Emergency Management Agency (FEMA) at the county level, and are updated periodically at different times. Floodplain data in GIS format was obtained directly from FEMA for Glenn County (1996), while data for Butte County (1998) was obtained directly from the County. Because these two datasets came from different sources, which are presented jointly in Exhibit 2-5, they do not match perfectly in terms of coverage areas. As a result, where the data overlap, the result is a darker shade of blue. In effect, either shade of blue mean the same; that is, they represent areas designated in the 100-year floodplain. The

mapping shown on Exhibit 2-5 has been revised to avoid this confusion and to include all areas that, after further research, have been identified as being located in the 100-year floodplain, including the Jenny Lind Bend. In summary, all of Bidwell-Sacramento River State Park, with the exception of most of the Irvine Finch subunit, is located within the 100-year floodplain.

- 6.8 The commenter states that there are errors in the description of the Sacramento River Conservation Area (SRCA) as presented in the General Plan. This comment is noted, and the text has been revised accordingly. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to the text on page 2-88 of the General Plan that clarifies the organization and purpose of the SRCA Forum.
- 6.9 The commenter requests that the public land ownership map (Exhibit 2-10) be expanded down to River Mile 190. As indicated in Response 6.3, a new exhibit (Exhibit 2-11) has been added to the General Plan that represents the “Pine Creek Preserve” concept, which extends south to the area in question, and includes public land ownership information.
- 6.10 The commenter states that the discussion of property acquisition/park expansion in the General Plan is limited and suggests that a larger planning area needed to be considered in the planning process. The discussion of property acquisition and park expansion occurs in several locations throughout the General Plan, including Section 2.4.8 (page 2-104) and goals/guidelines listed on pages 3-23 to 3-24, and clearly outline the issues facing the Park in terms of expansion of the Park and offers future management direction on that issue. Specifically, Goal AO-1.2 and implementing Guidelines AO-1.2-1, AO-1.2-2, and AO1.2-3 outline strategies to expand the Park to achieve park-wide goals. In addition, the General Plan includes three potential property acquisitions in the planning process based on ongoing acquisition efforts. While it is recognized that future expansion of the Park makes good planning sense from an environmental and operational perspective, it is the policy of the Department not to include properties that it does not own (or are in the process of being acquired) in the general plan process. If new properties are later added to the Park, the Department can amend the General Plan to reflect the Department’s vision for the new additions.
- 6.11 The commenter notes the importance of including only general locations of future facilities on the General Plan land use map due to ongoing planning efforts by other agencies and organizations in the project area. This comment is noted. As stated on page 3-31 of the General Plan, the actual locations of the specific facilities would be determined during the site-specific design, development, and review process, which would occur when individual projects are proposed. It is the intent of the Department

that future planning efforts are coordinated with these other entities, possible through a Task Force as described in Guideline AO-4.5-1.

- 6.12 The commenter seeks clarification on the Vision Statement included in the General Plan, specifically the intent of the statement that “the River will be allowed to meander, to the extent compatible with existing land uses.” The basic intent of this statement is that the Department proposes to allow for the natural meander of the Sacramento River and its tributaries. The Department does not generally support the use of bank stabilization features (e.g., rip-rap) and feels that the river should be permitted to meander. This vision is reflected in Goal ER-3.1 and Guideline ER-3.1-2 of the General Plan, which state that the river will be allowed to meander as compatible with public safety and environmental considerations (e.g., protection of special-status species and their habitats), and would adhere to the tenets of the SCRA. The Department acknowledges that this practice may affect the park in terms of property boundaries and the development and maintenance of facilities; as such, the natural movement of the river will need to be considered in future site planning and development efforts.
- 6.13 The commenter expresses opposition to the proposed loop trail at Indian Fishery that is included in the General Plan based on the sensitive nature of the riparian habitat and offers alternative alignments that would provide access to the Sacramento River. This comment is noted and was considered during the planning process and development of the proposed General Plan. The expansion of the existing loop trail at Indian Fishery to the south would allow for increased public access to more areas of the Park, as well as the adjacent river system, thus resulting in significant recreation benefits to visitors, which aids in meeting the recreation-oriented objective of the Department. The specific alignment of the proposed loop trail has not been identified at this point, and the Department will consider the sensitive environmental resources in the area during the trail design process. In addition, future environmental review of such a project will identify the environmental effects and offer mitigation if necessary.
- 6.14 The commenter seeks clarification on the conclusions made regarding the Maximum Restoration Alternative as the “environmentally superior alternative” and its relationship to the proposed General Plan. The development of the Maximum Restoration Alternative was in response to CEQA requirements to consider an alternative(s) that would address adverse environmental effects of the proposed project. The Maximum Restoration Alternative is intended to represent the scenario where no new facility development would occur and all existing parkland would be restored to natural habitat to the extent feasible. Because this scenario would avoid any potentially environmental effects associated with facility development under the proposed project (i.e., proposed General Plan), it was selected as the

“environmentally superior alternative” per State CEQA Guidelines §15126(d)(2). However, because the Maximum Restoration Alternative would substantially limit recreation opportunities, it conflicts with one of the fundamental missions of California State Parks, which is to provide high-quality recreation opportunities to residents of the State, and thus was excluded from further consideration in the planning process. On the other hand, the proposed General Plan, which is presented in Chapter 3 of the document, was selected as the “preferred alternative” and moved forward in the planning process because it balances the interests of natural, cultural, and recreational resources at the Park. Please refer to Chapter 4, Recommended Changes to the General Plan, for changes made to the text on page 4-34 that clarify this point.

- 6.15 The commenter notes that the “State Park” classification allows for improvements to make natural, cultural, and scenic resources and the recreation opportunities they provide available to the public, and requests that these resources are considered fully in the planning process. As a follow-up, the commenter asks why the Maximum Restoration Alternative was excluded from further consideration in the planning process. It is acknowledged that improvements are appropriate at State Parks to make important resources available to the public. For that reason, the Maximum Restoration Alternative was excluded from further consideration in the planning process because it would not allow for future improvements and would limit existing facilities in light of new habitat restoration efforts, thus partially conflicting with the intent of the State Park classification and the Department’s overall mission. As indicated in Response 6.14, the proposed General Plan balances these considerations, which allowed it to be selected as the “preferred alternative” for the proposed General Plan.
- 6.16 The commenter requests information related to the timing of the Final EIR and presentation to the State Parks and Recreation Commission. All of the responses to comments, together with the DEIR, will constitute the Final EIR, which was tentatively anticipated to be completed in the Spring of 2004. However, there were delays in finalizing the Final EIR, and now it is expect to be completed in November 2004. The Final EIR will subsequently be presented to the State Parks and Recreation Commission at a future date/time that has not yet been determined. All persons and organization on the project mailing list will be notified in advance of the Commission hearing.

464 East Third Ave.  
Chico, CA 95926  
January 22, 2004

Michael Fehling, Supervising Ranger  
California Department of Parks and Recreation – Northern Buttes District  
400 Glen Drive  
Oroville, CA 95966

Dear Mr. Fehling:

It was good to meet you last week and participate in the discussion. Generally speaking, it is an excellent plan as far as it goes. I hope can be implemented in a timely manner and not be a victim of the state budget crisis. It's a very good start, and if this were a simple "thumbs up/thumbs down" decision I would support it.

The potential for a larger park with more ecosystem restoration, more contiguous boundaries and fewer divisions, a wider riparian corridor, and more recreation opportunities exists and should be pursued more aggressively. This is dependent upon further land acquisitions. The success of various agencies, The Nature Conservancy and other groups suggests that more willing sellers can be found, and while this is mentioned in the document, it should be given greater emphasis.

The Vision Statement (3.1.2) seems very clear in the resolve to let the river "be allowed to meander" but then backpedals with "to the extent compatible with existing land uses." At one point the plan mentions some deleterious effects of previous "bank hardening" but it does not come out with a clear statement that there will be no further riprap in this area and that removal of some riprap on public land be considered. Rip rapping is inconsistent with the entire thrust of the plan and must be clearly forbidden in no uncertain terms. This needs to be part of a consistent policy throughout the Sacramento River Conservation Area.

Strengthening the land acquisition program and stopping rip rapping are my main concerns. I also have some specific comments and questions, listed below.

It was good to start with a statement on "Spirit of Place" since although this has to do with physical ecosystem management, it is crucial to understand and appreciate the area's outstanding aesthetic and psychic values in order that the "Spirit of Place" is not diminished. Again, an expansion of the park will enhance not just the physical space, but the psychic space.

Regarding boat launches, the recent expansion and paving at Pine Creek was very helpful in providing an alternative power boat launch to Irvine Finch. That's enough concrete, though. I strongly support the establishment of the cartop boat access at Big Chico Creek. Additional cartop launch points might be considered, perhaps including the abandoned boat launch at Chico Landing. I hope that is reconsidered, or that another small walk in campsite be established in the area. Some canoeists and kayakers now use an unofficial access point south of that launch, but north of the Singh property. This is a particularly popular alternative when the gate to Big Chico Creek access is locked. That could probably be developed inexpensively since there is already a dirt parking area there. A slight improvement of the short trail to the water, without a concrete pad or ramp, would do the job fine. I was encouraged to learn that the state is negotiating with the county on the property in question. If I can be of any assistance lobbying county commissioners or in other ways, please let me know.

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Regarding camping, I strongly support both the proposal to add a fifty site campground to the Beard property, a small environmental camp in the Big Chico Creek area, and the development of one other small walk-in campground. Improved launch access may well increase the popularity of camping on gravel bars, which would have a low environmental impact.

Regarding bikeways, it is unfortunate that both Butte and Glenn counties have good plans which are unfunded and are likely to remain so. I no longer cycle in this area because of the lack of shoulders and somewhat heavier traffic, which is unfortunate since otherwise Chico-River-Chico is a wonderful and easy loop. If other road expansions or moves occur, biking safety should be a prime consideration.

Regarding trails, a few large, wide, relatively maintained trails makes more sense than a vast system of smaller trails, since the riparian jungle can cover trails much faster than small trail crews can maintain them. The loop trail in the Big Chico Creek Area, the loop trail expansion in Indian Fishery, and the potential regional loop trail are particularly appealing.

Regarding an Interpretive Center, I support the establishment of one near Highway 32 and Hamilton City area whether at Sunset Ranch, Irvine Finch or elsewhere. Might this be combined with other plans for the Sacramento River Conservation Area?

Regarding concessions, restaurants and stores exist in nearby Hamilton City. Scotty's serves the east side. Except for possibly some temporary rolling stand or van based concessions during summer months, this should be sufficient. Further commercial development of this area would be highly undesirable and would create greater traffic problems.

Regarding the alternatives, I strongly agree that Alternative C, the Maximum Restoration Alternative is superior to the others. It will do much to change the public perception that agencies are trying to keep people from using the river. Any extra money spent would be very cost effective. As a taxpayer, I would consider Alternative C to be an excellent use of my tax dollars.

This document appears to be consistent with the Sacramento River Conservation Area plan and related efforts. This is insufficient, however, if one does not consider broader contexts. Section 4.5.2 blithely states that "no significant effects to energy and mineral resources would occur." That may be true within the proposed boundaries of the project, but major gravel extraction projects very near the area would have a deleterious effect on traffic, road degradation, noise, pollution, and potential runoff of mining wastes into the Sacramento River and its tributaries. The agencies involved in the planning and implementation must take an active role against any such proposed operations. Otherwise, much of your effort will have been for naught.

Please keep up the good work and don't hesitate to let me know if I can be of any assistance in implementing the plan.

Sincerely,

Jim Dwyer

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## Letter 7: Jim Dwyer

### *Undated*

- 7.1 The commenter generally expresses support for General Plan and hopes that it can be implemented in a timely manner. This comment is noted, and no further response is necessary.
- 7.2 The commenter states that potential property acquisitions and expansion of the Park should be given greater emphasis in the document, including areas outside the existing Park boundary. This comment is noted. Please refer to Response to Comment 6.10 for more information on this issue.
- 7.3 The commenter states the Vision Statement in the General Plan is conflicting in that the river will be allowed to meander, but only to the extent that that it is compatible with existing land uses. This comment is noted. The General Plan is intended to allow flexibility in determining the appropriateness of bank hardening, based on public safety, environmental considerations, and tenets of SRCA handbook; please refer to Response to Comment 6.12 for more information. Based on the inconsistency in the Vision Statement, it has been revised as described on page 4-7 in Chapter 4, Recommended Changes to the General Plan, which offers revisions to the text on page 3-2 to clarify this point.
- 7.4 The commenter supports the write-up pertaining to the “spirit of place” and feels it would be enhanced by park expansion. This comment is noted. The Department’s position on park expansion is offered in Response to Comment 6.10. No further response is necessary.
- 7.5 The commenter expresses support for the proposed car-top boat launch facility at Big Chico Creek and seeks additional boat launch and camping facilities near the “Chico Landing” area at Indian Fishery and/or on the County-owned property south of Indian Fishery. The Department notes the support for the proposed boat launch facility at Big Chico Creek. Additional boat launch locations were considered during the planning process, but it was determined that only one new facility would be appropriate on existing park property based on demand and environmental considerations. If new properties are added to the Park, such as the County-owned land in question, the development of additional recreational facilities will be considered. The Department appreciates the offer of assistance for coordination and collaboration with individuals, organizations, and agencies on these issues.

- 7.6 The commenter expresses support for the proposed campground on the Beard property and the environmental campground at the Big Chico Creek Riparian Area that are included as part of the General Plan, and inquires about alternative campground locations. This comment is noted. Additional campground developments and alternative locations were considered, but it was concluded that the proposed developments as suggested in the General Plan were appropriate based on level of demand and environmental considerations.
- 7.7 The commenter states that bicycling safety should be a prime consideration when planning improvements to the Park’s circulation system. This comment is noted. Bicycling safety at the Park is reflected in Goals VU-3.4, VU-3.8, and AO-3.4 and is considered in the analysis of public safety in the DEIR.
- 7.8 The commenter expresses support for the proposed trail system and feels that a few larger trails are better than a vast system of smaller trails. This comment is noted, and is consistent with Goal VU-3.4.
- 7.9 The commenter expresses support for an Interpretive Center in the region and asks whether this concept could be combined with other plans in the SRCA. This comment is noted. The potential for creating a multi-agency visitor/interpretive center serving a larger area is reflected in Goals VU-2.4 and AO-4.5.
- 7.10 The commenter expresses opposition for significant development of concessionaire services at the Park based on alternative commercial establishments in the area and associated traffic concerns. It is acknowledged that there is a significant demand at certain times for concessionaire services at the Park. Goal VU-1.7, which calls for the consideration of both temporary and permanent concessions as part of facility development proposals, is intended to allow flexibility in case specific services are needed as part of new development and/or as demand changes. Further, Guideline VU-3.1-5 would require traffic analyses for facility development to ensure compliance with traffic standards.
- 7.11 The commenter makes reference to both Alternative C and the Maximum Restoration Alternative as being the superior alternative. It is assumed that the commenter is referring to Alternative 1C (Maximum Treatment of Natural and Recreation Resources), which reflects the commenter’s reference to the increased use of the river. This alternative is not considered the “superior” or the “environmentally superior alternative”; it is Alternative 2 (Maximum Restoration Alternative) that is considered the “environmentally superior alternative.” The commenter’s support for Alternative 1C is noted, and no further response is necessary.

7.12 The commenter states that the environmental analysis, particularly effects on energy and mineral resources, needs to be based on a broader context, including proposed gravel mining project in close proximity to the Park. The analysis in the DEIR, which concludes that there would be no significant effects to energy and mineral resources associated with the proposed General Plan, is correct. It is acknowledged that proposed gravel mining projects that are outside the jurisdiction of the Department, could have an effect on mineral and energy resources; however, implementation of the proposed General Plan would not contribute to any additional aggregate mining. In fact, gravel and other mining activities are prohibited within the Park. Thus, no cumulative impact would occur as a result of the General Plan in regards to energy and mineral resources. Similarly, in terms of potential adverse environmental effects on traffic, noise, air pollution, and water quality associated from gravel mining projects, the proposed General Plan would result in less-than-significant impacts in these areas based on implementation of the goals and guidelines listed in the plan, none of which are expected to result in cumulative environmental impacts under CEQA. Sand and gravel operations involve traffic with much different characteristics than traffic attracted to the Park. Mining occurs primarily during the week and involves trucks traveling to construction project sites. Park traffic is destined to the different use areas of the park with the majority occurring on weekends. The consideration of traffic impacts, and the determination of a less-than-significant effect, take into account all background traffic on the roadways, including haul trucks.

Regarding the Departments role in addressing mining elsewhere on the river, it has no direct authority over whether mining activity continues or not. The Department expects to have the opportunity to submit comments on gravel mine projects through the environmental review processes required by the CEQA and other laws and regulations, if they are proposed for authorization or expansion.

## PUBLIC MEETING – SUMMARY

### Preliminary General Plan and Draft Environmental Impact Report

#### Bidwell-Sacramento River State Park

**Date:** January 15, 2004

**Time:** 7:00 – 9:00 PM

**Location:** Bidwell Mansion State Historic Park  
525 The Esplanade  
Chico, CA 95926

**Attendees:** Bernie LoFaso  
Bob LoFaso  
Carolyn Short, Chico Paddleheads  
Roger Calloway, California State Parks  
Gregg Werner, The Nature Conservancy  
Mike Crump, Butte County Department of Public Works  
Steve Crump  
Jim Dwyer  
Ann Elliot  
Steve Feazel, California State Parks  
Woody Elliott, California State Parks  
Michael Fehling, California State Parks  
Ellen Clark, California State Parks  
Rick McGaugh, California State Parks  
Tom Kastner, California State Parks  
Arlan Nickel, California State Parks  
Anna Kastner, California Department of Fish and Game  
John Merz, Sacramento River Preservation Trust

## COMMENTS:

- PM1-1 The General Plan should have included more properties, including property between Kusal Slough and the Sacramento River. The General Plan is not ambitious enough in terms of land coverage. The Department's policy on this issue should be referenced. A larger planning area should be defined in the General Plan and the maps. The General Plan should consider why the Park might consider expansion. The General Plan should look at the landscape as a planning tool. The City of Chico looks at areas beyond their jurisdiction. The Department should consider expansion of between 40 and 60 percent. The U.S. Fish and Wildlife Service's (USFWS's) plan was for a much larger planning area that covered lands not under USFWS jurisdiction.
- PM1-2 The vision statement is good.
- PM1-3 Support was expressed for proposed facility developments, including boat launches, including the car-top launch.
- PM1-4 The General Plan should consider the potential for a hike-in campground at Indian Fishery.
- PM1-5 The County property at the end of Indian Fishery has potential for improvement. Perhaps it should be under California Department of Parks and Recreation (DPR) management.
- PM1-6 Support was expressed for small number of trails, as opposed to larger number of trails.
- PM1-7 The vision statement backpedals in that there is no clear statement that states to eliminate or not eliminate the use of riprap.
- PM1-8 Gravel mining on River Road would create tremendous noise problems.
- PM1-9 Strongly agree that Alternative 1C is the way to go.
- PM1-10 The Department should consider realignment of River Road due to flooding.
- PM1-11 DPR is commended for the facility improvements proposed in the General Plan. DPR is the one agency that can provide and operate recreation facilities in the area.
- PM1-12 Does the Plan say how free the River will be to make its own boundaries? Removing rip-raps brings up lots of legal questions. This is one of the few areas

along the Sacramento River where no new rip rap should be installed. The Sacramento River should be allowed to meander in this area.

## **PUBLIC MEETING RESPONSES:**

- PM1-1 The commenter generally states that the proposed General plan needs to consider a larger planning area. This comment is noted. Please refer to Response to Comment 6.10 for more information.
- PM1-2 The commenter expresses support for the proposed Vision Statement in the General Plan. This comment is noted, and no further response is necessary.
- PM1-3 The commenter expresses support for various proposed facility developments, including proposals related to boat launch facilities, in the General Plan. The comment is noted. Please refer to Response to Comment 7.5 for more information.
- PM1-4 The commenter states that the General Plan should consider the potential for a hike-in campground at Indian Fishery. This comment is noted. Please refer to Response to Comment 7.6 for more information.
- PM1-5 The commenter states that the Department should consider acquisition of the County-owned property south of Indian Fishery. This comment is noted. Please refer to Response to Comment 7.5 for more information. Further, Overall Goal AO-4 and Goal AO-1.2 would allow the Department to coordinate with the County regarding the ownership and management of this property.
- PM1-6 The commenter expresses support for a small number of trails, as opposed to a larger number of trails. This comment is noted. Please refer to Response to Comment 7.8 for more information.
- PM1-7 The commenter notes conflicting statements in the Vision Statement regarding the use of rip-rap for bank stabilization. This comment is noted. Please refer to Responses to Comments 6.12 and 7.3 for more information.
- PM1-8 The commenter notes that gravel mining on River Road would create noise problems. This comment is noted. Please refer to Response to Comment 7.12 for more information.

- PM1-9 The commenter expresses support for Alternative 1C. This comment is noted. Please refer to Response to Comment 7.11 for more information.
- PM1-10 The commenter states that the Department should consider the realignment of River Road due to flooding. This comment is noted. Please refer to Responses to Comments 4.1 and 4.2 for more information.
- PM1-11 The commenter commends the Department for proposing recreation facility developments, as it is an agency with recreation-related mandates. This comment is noted, and no further response is necessary.
- PM1-12 The commenter inquires whether the General Plan states how the river will be allowed to make its own boundaries. This comment is noted. Please refer to Responses to Comments 6.12 and 7.3 for more information.

## SRCA FORUM BOARD MEETING – SUMMARY

### Preliminary General Plan and Draft Environmental Impact Report

#### Bidwell-Sacramento River State Park

**Date:** January 15, 2004

**Time:** 3:00 – 5:00 PM

**Location:** Willows, CA

#### COMMENTS:

##### Commenter: Lynnel Pollock (Yolo County)

PM2-1 Why was the loss of “Important Farmland” considered a significant and unavoidable impact? Contrary to what the DEIR states, there are mitigation measures available to mitigate this impact, namely the purchase of agricultural/conservation easements on farmland at off-site location in the region.

##### Commenter: General Public

PM2-2 How many acres of agricultural farmland would be taken out of production if the General Plan is implemented?

#### PUBLIC MEETING RESPONSES:

PM2-1 The commenter disagrees with the conclusion made in the DEIR that the conversion of designated farmland to non-agricultural uses is a significant and unavoidable environmental impact, and indicates the opinion that the use of agricultural/conservation easements could mitigate this impact to a less-than-significant level.

The environmental analysis in the DEIR found that the proposed acquisition of properties designated as Important Farmland and ultimate change in land use on these properties from agriculture to habitat restoration uses and a

combination of habitat restoration and low-intensity recreation uses in a rural setting constituted a significant environmental impact on agricultural resources, pursuant to the State CEQA Guidelines. Further, because feasible mitigation measures were not available, it represented a significant and unavoidable impact.

After additional consideration of this impact, the Department has determined that the conclusion in the DEIR was incorrect and that the correct finding, in this instance, is that the proposed Bidwell-Sacramento River State Park General Plan would not result in the conversion of designated Farmland to non-agricultural uses, and thus, the Plan would result in less-than-significant impacts to agricultural resources, and no mitigation measures are necessary. The evidence that supports changing the significance conclusion for this impact is based on the planned beneficial change in physical conditions of the affected properties, preservation of the soil and open space resource values attributed to agricultural lands, and the compatibility of the proposed land uses in the General Plan with agriculture and other open space uses on or adjacent to the Park.

A revised analysis addressing the effect that implementation of the General Plan would have on agricultural resources is presented in Chapter 4, Recommended Changes to the General Plan.

PM2-2 The comment seeks clarification on the number of acres of farmland that would be taken out of production if the proposed General Plan is implemented. Generally, all properties that are added to the Park and placed under the management of the Department would be considered for restoration and compatible low-intensity recreation uses in lieu of continuing existing land uses, including agriculture. Returning properties to their natural ecosystem and allowing natural processes to occur is considered compatible with the mission, purpose, and vision of California State Parks and Bidwell-Sacramento River State Park. Proposed land uses on properties that have been added to the Park since the DEIR was released to the public in December 2003 (i.e., Singh and Brayton properties) would result in approximately 75 acres of former riparian woodland that had been converted to farmland returned to native habitat in conjunction with low-intensity recreation uses; however, only the Singh property (about 35 acres) is designated Farmland under the FMMP. Other potential property additions considered in the General Plan (i.e., Beard property and Sunset Ranch) would potentially change land use on an additional 35 acres of designated Farmland to non-agricultural uses (note: the Sunset Ranch property is not currently in agricultural production).

## 4 RECOMMENDED CHANGES TO THE GENERAL PLAN

This chapter contains recommended changes and modifications to the Preliminary General Plan and DEIR for Bidwell-Sacramento River State Park made subsequent to its public release and the public review process. Changes that are a result of responses to comments detailed in Chapter 3 are presented in Section 4.1. Section 4.2 includes proposed Department staff-related changes that cover editorial clarifications, minor revisions to the Plan language to emphasize or clarify points or issues of interest, and inclusions and/or revisions to policy goals and guidelines as part of the Park Plan. (Where revisions result in new headers and/or table and exhibits, the existing numbering convention will be updated as part of the Final General Plan.)

### 4.1 CHANGES FROM RESPONSES TO PUBLIC COMMENTS

PAGE 1-6, 3RD AND 4TH PARAGRAPH:

#### PUBLIC INVOLVEMENT

Public involvement ~~is~~ has been an important component of ~~the~~ this General Planning process. Input from the public ~~is~~ was sought at the beginning and throughout the planning process for a variety of reasons. Most importantly, State Park units are owned, in effect, by the people of the State of California, and are managed to protect natural and cultural resources and to provide recreation opportunities that ~~and~~ accommodate use by the people of California. In addition, local residents and stakeholders, including ~~as well as~~ specific statewide user groups, are ~~may be~~ able to provide important information about the Park's resources and to, ~~as well as~~ help the Department better manage the Park.

A range of methods, such as public meetings, user surveys, newsletters, and written comments, were used to identify stakeholders of the Park and to identify their needs and concerns for the future management of the Park. The public involvement process included a set of three public meetings. The first meeting (March 18, 2003) focused on announcing the project to the public and served as a CEQA scoping meeting. The second meeting (July 30, 2003) focused on presentation of several planning alternatives. The third and final meeting (January 15, 2004) presented the proposed General Plan and associated environmental impacts identified in the DEIR component of the Plan. As part of the public involvement process, information on the planning process was provided via newsletters and was available online on the project website. Moreover, input from the general public and public agencies was solicited via oral comments, hard-copy comment forms, and online surveys. This information was compiled and considered by the Department if the planning process and is part of the public record for the project.

PAGE 2-37, EXHIBIT 2-5:

(Exhibit 2-5 has been revised to remove overlapping areas of the floodplain mapping.)

**PAGE 2-85, 4TH PARAGRAPH:**

The Hamilton City ~~Volunteer Fire Protection District (HCFPD)~~ provides fire protection and emergency medical services to the Irvine Finch subunit, which is located in Glenn County. The ~~Hamilton City Volunteer Fire District HCFPD~~ HCFPD is an all-volunteer district with limited financial and volunteer resources. Based on these limitations, HCFPD can experience difficulties responding to fire emergencies at the Park in a timely manner, although based on the proximity to the Park, response times would normally occur within several minutes of receiving an alarm.

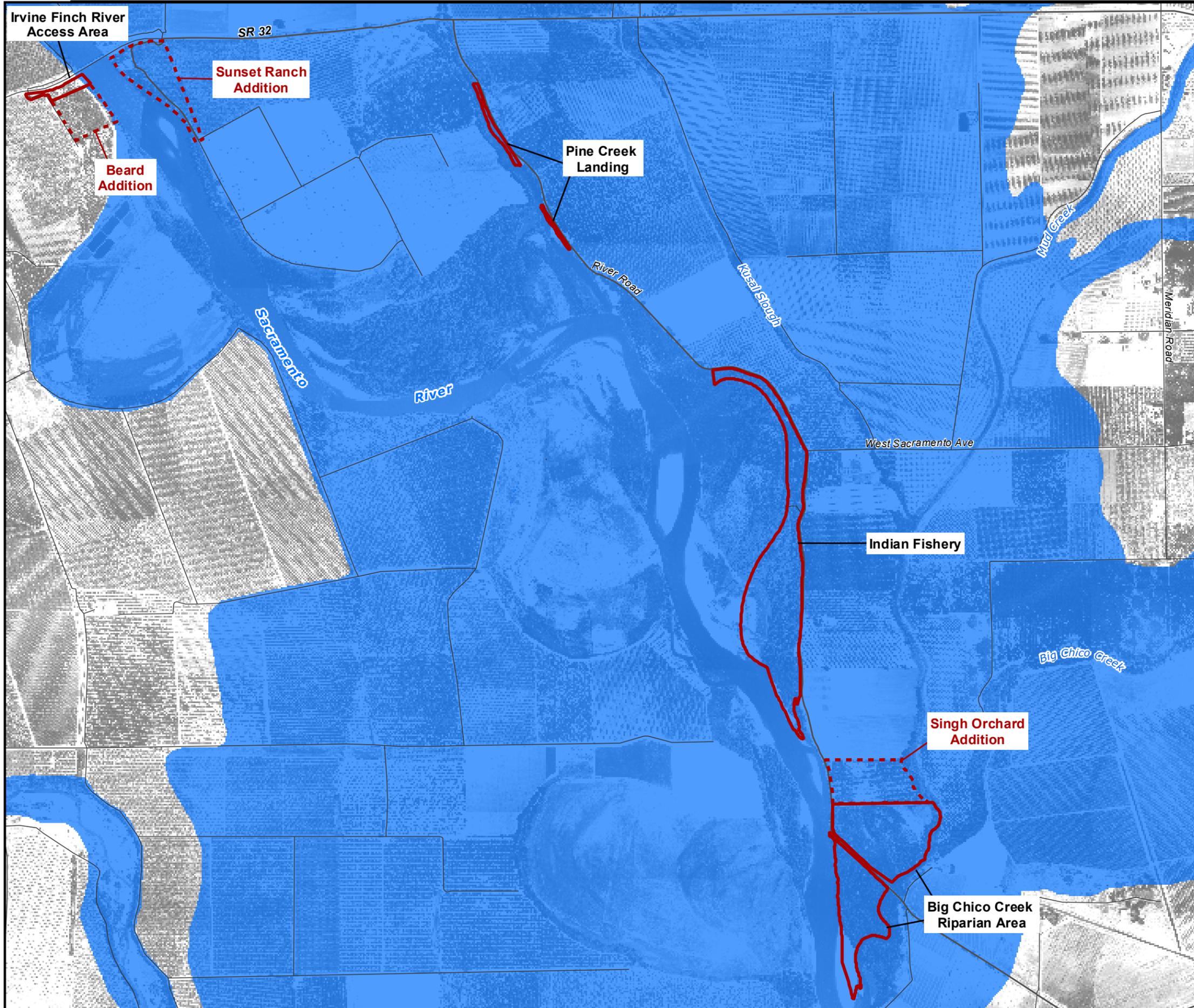
**PAGE 2-88, 3RD PARAGRAPH:**

**Sacramento River Conservation Area**

In 1986, the California State Legislature passed Senate Bill 1086, which calls for the development of a management plan for the Sacramento River and its tributaries to protect, restore, and enhance both fisheries and riparian habitat. The result of this effort was the Upper Sacramento River Fisheries and Riparian Habitat Management Plan published by the State of California Resources Agency in 1989. This management plan addresses a 222-mile stretch of the Sacramento River from Keswick Dam (north) to Verona (south), which is referred to as the Sacramento River Conservation Area (SRCA). The goal of the SRCA is to “*preserve remaining riparian habitat and reestablish a continuous riparian ecosystem along the Sacramento River between Redding and Chico and reestablish riparian vegetation along the river from Chico to Verona.*” The Sacramento River Conservation Area Forum (SRCAF) is ~~a conglomeration of local, state, federal, and private organizations~~ a private, non-profit organization made up of both landowners and public interest representatives appointed by seven northern California counties (i.e., Sutter and Yolo Counties in the south to Shasta County in the north), one representative from the State Resources Agency, as well as six non-voting State and federal agency representatives. The SRCAF, a focal point for agencies, organizations and individuals who are concerned with the development of the SRCA, aimed to ~~at implementing the actions plans and programs necessary to achieve the goals of established for the SRCA.~~ The guiding principles for the SRCA include: ecosystem management, flood management, voluntary participation, local concerns, bank protection, and information and education. The Park is located within the SRCA; therefore, planning for the Park’s future needs to consider the management strategies developed for the SRCA.

**PAGE 2-92, 1ST PARAGRAPH:**

A number of recommendations came out of this study, including the proposed establishment of a “Pine Creek Preserve,” which would consist of over 3,800 acres of conservation land held by federal and state agencies and non-profit land trusts in the Pine Creek/Hamilton City area (see Exhibit 2-11). (Please refer to attached Exhibit 2-11.)

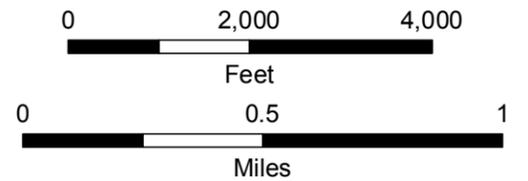


# Bidwell-Sacramento River State Park

## EXHIBIT 2-5 FLOODPLAINS

### LEGEND

- Bidwell-Sacramento River State Park
- Potential Property Additions (In discussion with landowners)
- Major Roads
- Roads
- 100-Year Floodplain



\* Aerial photograph as of 1999



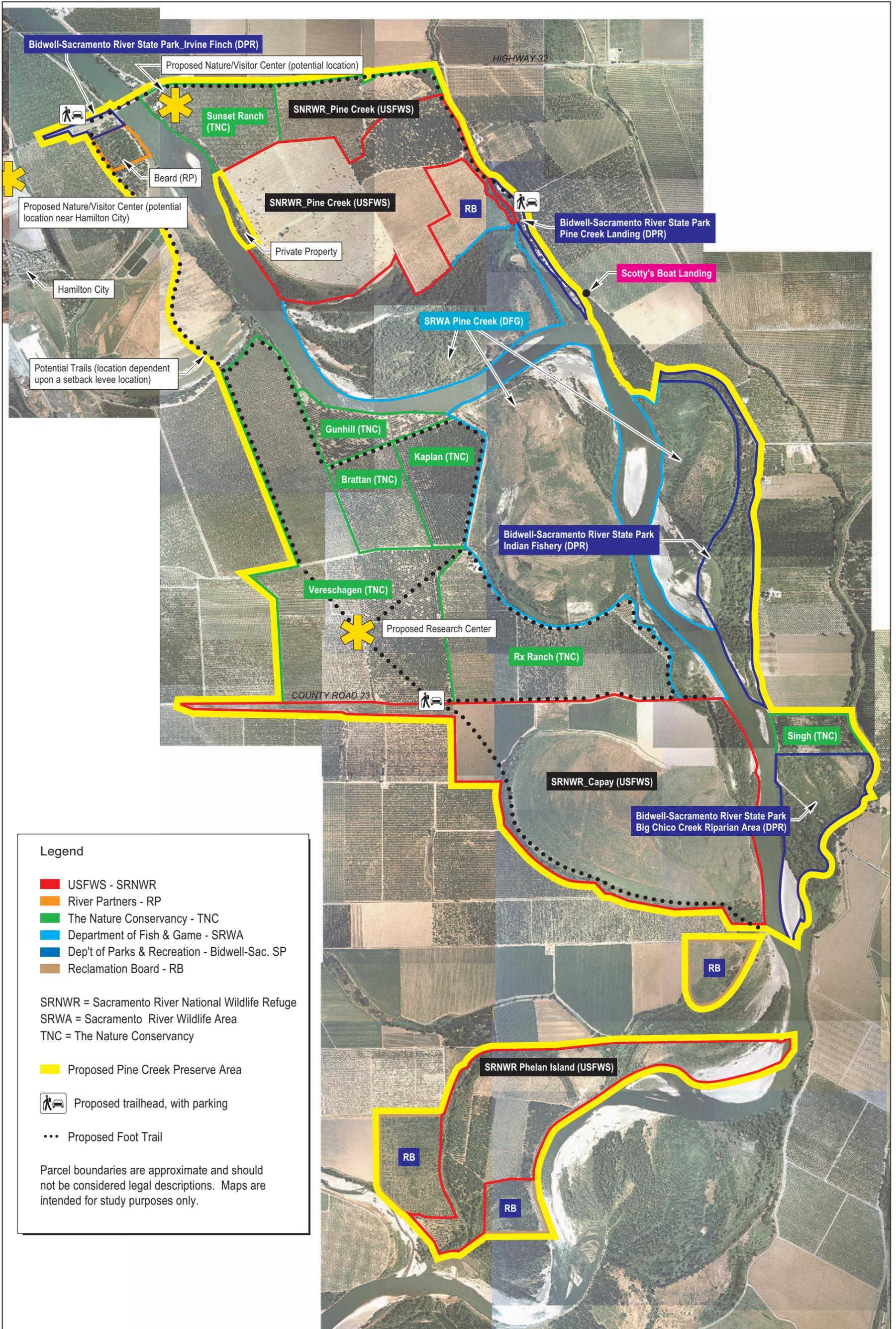
Sources: FEMA Q3 Flood Data 1996, Butte County 1998, GIC 2003, DPR 2003

Sep. 13, 2005

**EDAW**

x:/projects/bidwell sp/reports\_layouts/2-5\_Floodplains\_revSep05.mxd





**Legend**

- █ USFWS - SRNWR
- █ River Partners - RP
- █ The Nature Conservancy - TNC
- █ Department of Fish & Game - SRWA
- █ Dep't of Parks & Recreation - Bidwell-Sac. SP
- █ Reclamation Board - RB

SRNWR = Sacramento River National Wildlife Refuge  
 SRWA = Sacramento River Wildlife Area  
 TNC = The Nature Conservancy

- Proposed Pine Creek Preserve Area
- Proposed trailhead, with parking
- ... Proposed Foot Trail

Parcel boundaries are approximate and should not be considered legal descriptions. Maps are intended for study purposes only.

Source: TNC (2002); USFWS (2002); CDFG (2002); DPR (1994); EDAW (2002)

### Proposed Pine Creek Preserve Area Concept Plan (Sacramento River Public Recreation Access Study)



**PAGE 3-2, 5TH PARAGRAPH (VISION STATEMENT):**

The Park is one of the last remnants of the historically extensive Sacramento River riparian system. The successional riparian forest and its abundant biodiversity will be maintained in their natural and native state. The river will be allowed to meander, to the extent compatible with public safety and environmental consideration~~existing land uses~~. Developments in the Park will be designed to accommodate naturally occurring floods. Through the Park's interpretive and educational facilities and programs, visitors, such as school groups, will learn about the dynamic nature of the Sacramento River and the way it shapes the ever-changing landscape and the surrounding land uses.

**PAGE 3-12, 1ST PARAGRAPH AND GOAL VU-1.1-1:**

**River Access**

The primary recreational attraction of the Park is the access it provides to the Sacramento River. Popular activities in the river include boating, fishing, tubing, kayaking, swimming, and wading. The Park features two boat ramps for both motorized and non-motorized (cartop) boat launching, as well as a number of undeveloped areas, such as gravel bars, that provide additional launching opportunities for non-motorized boats. The continuing growth in the demand for recreational boating opportunities and law enforcement needs on the river, intensified by the relative shortage of functional boat ramps in the area, may be accommodated by new or expanded facilities at the Park. Coordination between those agencies that have jurisdiction over and/or operate boat launch facilities, such as the California Department of Water Resources (including the Reclamation Board), California Department of Boating and Waterways, and California State Lands Commission, is an important key to providing sufficient and appropriate boating access in the region.

**Goal VU-1.1:** Expand boat launching opportunities serving motorized and non-motorized boating activity based on availability of appropriate sites and as permitted by appropriate agencies.

**PAGE 3-23, 2ND PARAGRAPH:**

**PARK-WIDE GOALS AND GUIDELINES FOR PARK BOUNDARIES**

As it exists today, the current extent of Bidwell-Sacramento River State Park is relatively small for a State Park unit, totaling just over 200 acres in size. In addition, the Park is a conglomeration of several discrete properties that function separately in providing recreational opportunities to the public and enhancing resource values in the Park. Although the approximate location of these properties (or subunits) is known, there exists some degree of uncertainty regarding their precise boundaries. There are currently efforts underway to resolve these boundary issues between the Department and Butte County along River Road

through the implementation of new property surveys. Because of the fragmented nature of the Park's subunits, which is not visitor-friendly and can result in operational inefficiency, there is the desire to expand the Park, where feasible, to promote connectivity between the Park's subunits, as well as with other public land in the region, and to establish logical Park boundaries based on existing geographic features.

**PAGE 3-26, FACILITY SITING AND DESIGN (NEW POLICY GOALS/GUIDELINES):**

Goal AO-3.2: Maintain soil-related resource values and natural processes associated with areas designated as Important Farmland in Glenn and Butte counties, such as soil formation, open space, groundwater recharge, and wildlife habitat through the appropriate planning of uses and site design to be compatible with and protective of those values.

- < Guideline AO-3.2-1: In areas designated as Important Farmland, proposed land uses will be planned and designed in a manner that will minimize alteration of the natural landform and be compatible with the open space values of the area.
- < Guideline AO-3.2-2: Implement native vegetation restoration in areas where recreational uses are not planned to meet the recreation objectives of the Department or recreation needs of the region.

Goal AO-3.3: In recognition of the importance policy of both permanent preservation of productive agricultural land and restoration, protection, and management of the state's natural, historic, and cultural resources, the Department will incorporate the following measures as modeled on the CALFED agricultural land and water strategies.

- < Guideline AO-3.3-1: The strategies that would be most compatible with the Goals, Guidelines and Vision found in the General Plan, and therefore, would be considered and implemented as appropriate, include the following:
  1. Siting and aligning Program features to avoid or minimize impacts on agriculture.
  2. Restoring existing degraded habitat as a priority before converting agricultural land.
  3. Focusing habitat restoration efforts on developing new habitat on public lands before converting agricultural land.
  10. Examining structural and nonstructural alternatives to achieving project goals in order to avoid impacts on agricultural land.
  15. Using a planned or phase habitat development approach in concert with adaptive management.
  16. Minimizing the amount of water supply required to sustain habitat restoration acreage.

**PAGE 3-30, GUIDELINE AO-4.5-1:**

**Guideline AO-4.5-1:** Support the concept of a multi-organization task-force consisting of representatives from USFWS, CDFG, and other entities with local jurisdictional authority, such as the Department of Water Resources (Reclamation Board), as well as interested non-profit groups, to address Park-specific and broader ~~local~~ planning and resource management issues.

**PAGE 3-35, 1ST AND 2ND PARAGRAPH:**

The existing parking area may be expanded to accommodate existing and projected use levels at Irvine Finch. The parking expansion could be located on the Beard addition, adjacent to the existing parking lot to the south. This parking area could serve day-users, boaters, and overnight campers. To maintain the soil values of the site, including the permeability of the surface area, the parking lot would be designed to minimize new pavement. The size of the expansion would be dependent on the level of campground development and existing use levels at the time of development; at this time, it is estimated that ~~a parking expansion may be roughly double~~ the existing parking capacity at Irvine Finch may increase from approximately 1 to 2 acres.

A new overnight campground is also being considered for development on the Beard Addition south of the existing Irvine Finch facility. The campground could include family and group campsites, and is envisioned to ~~be a moderate-scaled facility include (e.g., roughly 50 family and 3 group campsites)~~ surrounded by areas of restored native vegetation. The precise size and layout of the campground would be determined during project-specific planning. Campsites would ~~likely~~ include standard amenities, such as portable concrete picnic tables, fire pits, food lockers, and parking. Similar to the expanded parking area, the campground would be designed to minimize paved areas, for example by using natural surfacing and removable facilities. This facility could be developed in conjunction with the existing day-use area and boat launch facility to offer an integrated, multi-use, recreational destination for Park visitors.

**PAGE 4-25, 3RD PARAGRAPH:**

For services provided by outside sources including, solid waste collection and disposal, road maintenance, fire protection, law enforcement, and emergency medical services, existing service providers would be utilized. For most service providers, ~~There~~ are no known capacity issues that would affect the provision of these services for the Park. Fire protection services provided by the Hamilton City Fire Protection District are based on limited financial and volunteer resources, but would be supplemented by CDF and internal Department staff, which have experience in handling the types of wildfires that could potentially occur at the Park.

Further, cooperation and coordination with service providers, as described in Goal AO-2.3 and Guideline AO-2.3-1, would help ensure that adequate public services be provided.

**PAGE 4-7, IMPACT AG (REPLACEMENT OF ENTIRE AGRICULTURAL RESOURCE IMPACT DISCUSSION):**

This section analyzes whether impacts to agricultural resources from implementation of the General Plan would result in potentially significant adverse impacts to the physical environment. The analysis is based on a review of proposed facility development, recreational uses, and resource management programs on land currently designated Important Farmland and/or active agricultural uses in the region. Existing conditions related to agricultural resources in the vicinity of the Park are described in Chapter 2, Existing Conditions and Issues, of the General Plan, which constitutes the environmental setting under CEQA. In addition, in keeping with the Secretary’s policy memo, additional information has been added to discuss socioeconomic considerations.

**THRESHOLDS OF SIGNIFICANCE**

Information useful for developing thresholds of significance for determining whether an agricultural land conversion creates a significant environmental effect was reviewed, including the State CEQA Guidelines and other CEQA documents addressing the topic.

Appendix G of the State CEQA Guidelines is a “checklist” of sample questions to aid lead agencies in determining whether a project could cause potentially significant environmental impacts. The “Agriculture Resources” section of the Appendix G checklist provides examples of land use changes as a way of aiding lead agencies in determining whether impacts to agricultural resources result in significant environmental effects. The checklist asks whether the project would:

- < Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- < Conflict with existing zoning for agricultural use, or a Williamson Act contract; or
- < Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland, to non-agricultural use.

Although land use changes are not, in of themselves, significant effects on the environment, changes from less-intensive to more-intensive uses can be indicators that physical effects may be reasonably foreseeable, including indirect and secondary effects. As stated in the CEQA Guidelines definitions, “effects” includes:

Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.

(CEQA Guidelines § 15358(a)(2). Emphasis added.) Therefore the threshold question is not whether there will be a land use change, but whether the land use change which will result in a potentially significant adverse impact on the physical environment. The “environment” is defined as land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. (CEQA Guidelines § 15360.) Although the “environment” includes “both natural and man made conditions,” the Guidelines acknowledge that current “natural conditions, including ecosystems” can in fact be man-made.<sup>1</sup>

For example, in the California Bay-Delta Authority’s (CBDA) Draft EIR on the Sacramento River-Chico Landing Subreach Habitat Restoration project, the threshold of significance related to restoration of Farmland to natural habitat is as follows:

- < Result in a permanent conversion of a substantial acreage of Prime, Unique, or Statewide Important Farmland. A permanent conversion is considered to be one that involves the irreversible change to land uses that would cause serious degradation or elimination of the physical conditions or natural processes that provide the land’s resource qualities for agriculture and/or require expenditures of substantial development costs that would likely preclude future conversion back to agricultural uses if the opportunity for such conversion were to arise (CBDA 2005).

In a memorandum to its departments, dated May 4, 2005, The Resources Agency described its policy for all departments to “recognize the importance of both permanent preservation of productive agricultural land and restoration, protection, and management of the state’s natural, historic, and cultural resources.” In selecting and developing resource-related projects, departments “should consider ways to reduce effects on productive agricultural land.” To minimize these effects departments should review the mitigation strategies presented in the CALFED Final Programmatic EIS/EIR (CALFED 2000) and incorporate them, where appropriate.

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<sup>1</sup> For example, man-made agricultural drainage and irrigation canals can constitute critical riparian habitat for the giant garter snake (GGS)(*Thamnophis gigas*), a threatened species under both the Federal and State Endangered Species Acts. As stated in the *Draft Natomas Basin Habitat Conservation Plan, Sacramento and Sutter Counties* (July 25, 2002): “After emergence from winter retreats, which occurs by late March or early April, GGS utilize canals with water that persists through the summer months. Many of the canals contain adequate emergent aquatic vegetation and steep, vegetated banks that provide cover and an abundant food supply of small fish, tadpoles and frogs.” (*Natomas Basin HCP – Biological Data*, at p. II-9.)

## IMPACT ANALYSIS

Impact  
AG

**Habitat Restoration and Low-Intensity Recreation Uses on Agricultural Lands.** Implementation of the General Plan would result in new land uses in areas designated as Important Farmland and/or currently in agricultural production. The affected property that would be entirely restored to natural vegetation conditions is the Singh property, and properties that would support a combination of restored natural vegetation and low-intensity, outdoor recreation uses in a rural setting are the Sunset Ranch, Beard, and Brayton properties. The proposed recreation uses are considered compatible with agriculture in relevant state and federal farmland protection programs. Although commercial agriculture (i.e., orchard crops) would not continue under the General Plan, essentially the orchard trees are being replaced with native trees, such as willows and cottonwoods for non-commercial purposes. This could have a minor economic effect (see discussion in Socioeconomic Considerations on page 4-20) related to a small reduction of local crop production<sup>2</sup>, but the change from commercial uses to non-commercial uses (i.e., the change from walnuts to willows) would not substantially diminish the land, soils or open space values of the physical resource, nor would they preclude future agricultural use of the land. It was these former conditions, before the clearing of the riparian forests that allowed the formation of these highly productive soils. The Department considers “conversion,” for the purposes of assuming potential impacts under the Appendix G checklist and Land Evaluation and Site Assessment (LESA) Model to involve the commitment of productive farmed land to irreversible development or non-agricultural uses that damage or eliminate the soil and open space values of the land or create secondary growth-inducing impacts to adjacent farmed lands by precluding nearby agricultural uses, as described in the following sections. Therefore, the impact to agricultural resources from allowing native vegetation restoration and/or low-impact recreation would result in a **less-than-significant environmental impact.**

### **Proposed Land Use Changes on Affected Properties**

There are four properties (or subunits) within the Park with lands that are either designated as Important Farmland and/or are currently in commercial agriculture production. The Singh Property (approximately 34 acres) is classified mainly as “Irrigated Farmland” under the Farmland Mapping and Monitoring Program (FMMP) administered by the California Department of Conservation (DOC). “Irrigated Farmland” is an interim map category that

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<sup>2</sup> An economic or social change by itself is not considered a significant effect on the environment (CEQA Guidelines §15382).

substitutes for the categories of Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance in farmed areas lacking modern soil survey information (DOC 2004). The Singh property is planned for restoration to natural vegetation as an extension of the Big Chico Creek Riparian Area. The Sunset Ranch property (approximately 32 acres) contains roughly 14 acres east of the existing access road that is also classified as "Irrigated Farmland". Although a visitor center, administrative center, and day use area are proposed for the area west of the access road, which is not designated as irrigated farmland, the remaining portion of the property does not have any specific land uses proposed in the General Plan, and it has already been restored to native grassland and shrubs by TNC. The Beard Property (approximately 19 acres) is classified mainly as "Prime Farmland", and the Brayton property (approximately 41 acres) is classified as "Other" (although it is currently in active orchard production). Both of these properties are planned for joint low-intensity, rural outdoor recreation use and natural vegetation restoration. Proposed recreational uses on the Beard property include a family/group campground as an extension of the Irvine Finch River Access facility. At the Brayton property, proposed recreation opportunities include primitive camping, day-use facilities, and trails.

### **Definition of Conversion of Agricultural Land and Relationship to CEQA**

It is important to understand the meaning or intent of the concept of "conversion of farmland to non-agricultural uses" in the regulatory, planning, and academic references about this important topic. The following information provides the substantial evidence that the planned uses of the affected properties do not constitute a conversion of farmland resulting in potentially significant adverse environmental impacts as defined in CEQA and the CEQA Guidelines. In the following paragraphs, the definition of the term "conversion" in the context of agricultural land is further addressed.

In the American Farmland Trust's mapping program, Farming on the Edge, the assessment of loss of farmland (i.e., conversion) evaluates the acres of farmland converted to developed uses (American Farmland Trust 2004). The definition of "development" uses the term, "urban and built-up areas" from the National Resource Inventory, which is described as follows:

- **urban and built-up areas:** A land cover/use category from the National Resources Inventory that includes residential, industrial, commercial, and institutional land; construction sites; public administrative sites; railroad yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment plants; water control structures and spillways; other land used for such purposes; small parks (less than 10 acres) within urban built up areas; and highways, railroads and other transportation facilities if they are surrounded by urban areas.

The planned actions on the affected properties at Bidwell-Sacramento River State Park do not fit this definition of urban and built-up land, so in the sense of this mapping program, the

planned uses do not qualify as “conversion” to development. The term “urban and built up land” is also used in the California Department of Conservation’s Farmland Mapping and Monitoring Program (see below).

At the federal level, the Federal Farmland Policy Protection Act (FPPA) requires consideration of whether federal actions would lead to the conversion of agricultural lands to non-agricultural uses. While the statute does not include a definition of “non-agricultural uses,” the procedures established by the Natural Resources Conservation Service (NRCS) for assessing farmland conversion impacts provide some insight. NRCS created Form AD 1006 to provide a “Farmland Conversion Impact Rating” to Federal actions. In assessing conversions, the form defines uses as “urban,” which detract from agricultural land values in the rating system, and “non-urban uses,” which create or protect agricultural land values in the rating system. The definition of “non-urban uses” includes: agricultural land; range land; forest land; non-paved parks and recreational areas; rural roads; lakes, ponds and other water bodies; open space; and wetlands, among other similar uses. Urban uses include houses, apartments, commercial and industrial buildings, paved recreation areas (e.g., tennis courts), and other urban development (NRCS 1983). The planned actions on the affected properties at Bidwell-Sacramento River State Park would clearly not result in “urban” uses, but would fall within the “non-urban” use category (i.e., non-paved parks and recreational areas, rural roads, other water bodies, open space, and wetlands) that creates or protects agricultural land values. Therefore, the ultimate physical conditions of the affected properties resulting from adoption of the General Plan would be protective of agricultural land values, as considered by the procedures implementing the Farmland Policy Protection Act.

In addition, it is important to note that federal environmental analysis for projects, including projects on farmland, is performed under the auspices of the National Environmental Policy Act (NEPA) (42 United States Code §§ 4321-4347) and not CEQA. NEPA and CEQA differ fundamentally in that NEPA concerns the “human environment” and requires that whenever an environmental impact statement is prepared interrelated economic or social effects shall be discussed. (Council on Environmental Quality – Regulations for Implementing NEPA §1508.14). But there is no concomitant duty to mitigate. In contrast, the CEQA Guidelines provide that “economic or social information may be included in an EIR or may be presented in whatever form the agency desires” but that “economic or social effects of a project shall not be treated as significant effects on the environment.” (CEQA Guidelines § 15131. Emphasis added.) Where there are significant environmental effects occurring, as defined by CEQA, a project cannot be approved if there are feasible alternatives or feasible mitigation measures which would substantially lessen those effects. (Public Resources Code § 21002.)

The Department of Conservation’s California Agricultural Land Evaluation and Site Assessment (LESA) Model was based on the Federal Natural Resource Conservation Service’s Land Evaluation and Site Assessment system. As previously noted, the Federal LESA “was adopted as

a procedural tool at the federal level for identifying and addressing the potential adverse effects of federal programs (e.g. , funding of highway construction) on farmland protection.” (LESA instruction Manual (Department of Conservation, 1997) at p. 2.) On the Federal level “farmland protection” included physical and socioeconomic factors and did not require mitigation under NEPA. Yet both the Federal and State LESA call development projects “Land Committed to Nonagricultural Use” and contrast that with agricultural land, parks, and habitat – which they define as “Protected Resource Lands.”

LESA defines “Land Committed to Nonagricultural Use,” as “land that is permanently committed by local elected officials to nonagricultural development by virtue of decisions which cannot be reversed simply by a majority vote of a city council or county board of supervisors.” (LESA Instruction Manual at p. 26.) The commitment to non-agricultural uses is further described as requiring a tentative subdivision map, tentative or final parcel map, or recorded development agreement. Each of these descriptors involves an urban development action that is not related in any way to the planned uses of the affected properties at Bidwell-Sacramento River State Park. In direct contrast, the LESA Model classifies the planned uses at Bidwell-Sacramento River State Park as “Protected Resources Lands” and states:

Protected resource lands are those lands with long term use restrictions that are compatible with or supportive of agricultural uses of land. Included among them are the following:

- Williamson Act contracted lands
- Publicly owned lands maintained as park, forest, or watershed resources
- Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses.

(LESA Instruction Manual at p. 28.) Therefore, the LESA Model itself, included as a reference in Appendix G, distinguishes the planned uses at the Bidwell-Sacramento River State Park from the land use changes associated with “Lands Committed to Non-agricultural Use” (i.e., urban and industrial development) and their potentially significant adverse impacts to the physical environment.

In addition, in a University of California issue briefing paper on agricultural land loss, the “paving over” of farmland is the primary concern raised regarding “farmland conversion.” This involves a substantial loss of farmland by permanent conversion to developed uses through urbanization, almost a half million acres over 10 years ending in 1998 (Kuminoff, Sokolow, and Sumner 2001). The paper also notes an increase in retirement of agricultural lands for open space and habitat conservation purposes in recent years, which contribute to economic effects from reductions in the amount of cultivated acres. The General Plan’s

planned uses of the affected properties at Bidwell-Sacramento River State Park do not involve permanently paving over of agricultural lands, but would be considered to be in the category of land retired for habitat conservation purposes, along with low-intensity, rural outdoor recreation use. While an economic (and not environmental) effect of cessation of crop production would occur, a permanent conversion to developed uses that result in the loss of the agricultural resource would not take place.

Construction of low-intensity, outdoor recreation uses (e.g., rural roads, family campsites, trails) on parts of the properties now in agricultural use would not preclude their return to agricultural cultivation in the future, because the physical values of the land for agriculture would be maintained and the cost of removing recreational facilities would be modest. For instance, if in the future the state determined the properties to be surplus and sold them to other parties, it would be feasible to remove the facilities, so that new landowners could farm the land, if they chose to do so. Consequently, the use of parts of these properties for low-intensity, outdoor recreation would not constitute conversion in the sense of the environmental impact concerns of CEQA. Therefore, the Appendix G criterion of a “conversion to nonagricultural use,” which would result in a potentially significant environmental impact, does not apply to the facts of the situation in this instance. Further discussion of this issue in the context of the proposed natural vegetation restoration and low-intensity rural recreation uses at the Park is provided below.

### **Habitat Restoration Uses**

As described above, the Singh Property and portions of the Sunset Ranch property would be restored to native vegetation under the General Plan. Unlike urban development, natural vegetation restoration would represent a return to the land’s original (natural) physical condition, as part of a riparian corridor, which offers long-term natural process and function benefits, including the natural formation of soils that provide these sites with their current resource values. (In fact, native vegetation restoration is a type of sustainable native plant cultivation.) Because the resource value of the soil is tied directly to the natural conditions and processes that existed prior to commercial agricultural cultivation, native vegetation restoration efforts would in effect be preserving (and possibly improving over time) the soil integrity (Cannon 2004). Further, because no new development is proposed on the Singh Property or on the “farmland” portions of the Sunset Ranch property, these lands would not be lost to potential future resource uses, including agriculture, due to the construction of buildings and paved areas. Lastly, proposed habitat uses would not cause potentially growth-inducing impacts by indirectly affecting the ability of nearby agricultural uses to continue to operate as they would not significantly restrict agricultural uses or farming practices on adjacent lands.

It also can be argued that agricultural lands provide open space values. In fact, the definition of “agricultural preserves” under the Williamson Act includes areas devoted to open uses (California Government Code Section 51201(d)). Under the proposed General Plan, the open space value of these lands would also be retained. The Department, as a steward of the land, would manage these properties in a manner that would preserve these open space values into the future, and because these properties would be held in public trust by the Department, the potential for loss of open space due to future urban development is negligible.

Further, the resource value of the land would be enhanced through natural processes that would occur in the absence of active agriculture. By ceasing agricultural practices, the nutrient value of the soils and groundwater levels are allowed to recharge. This recharge value could be augmented through native vegetation restoration practices that would improve and restore the natural hydrological processes of these lands, such as allowing for meandering.

### **Rural Outdoor Recreation Uses**

Both the Beard and Brayton properties are planned for a combination of both low-intensity outdoor recreation use and native vegetation restoration. These properties are located in a rural area next to the Sacramento River, so they would in effect become low-intensity, outdoor recreational uses in a rural setting, in combination with native vegetation restoration on portions of the sites. While native vegetation restoration would not be the primary focus of these areas, the existing orchards would be removed and the property would be restored to natural vegetation in conjunction with the proposed recreational improvements. Thus, the environmental and (potential) agricultural benefits of restored natural soil-forming process over the long term would occur on the natural vegetation restoration portions of the Beard and Brayton properties, as described above, and for the Singh and irrigated farmland portion of the Sunset Ranch properties.

New goals/guidelines have been added to the proposed General Plan that recognize the resource value of these lands (please refer to Chapter 3, Park Plan). New Guideline AO-3.2-1 states that proposed land uses on areas mapped as important farmland would be planned such that these areas would minimize alteration of the natural landform and all new recreation facilities would be compatible with the open space values of the area, including the resource values that support agricultural productivity. The proposed rural recreational use of these properties, which include standard campground/day-use features and ancillary facilities (e.g., parking, restrooms, etc.), would conform to this guideline by incorporating provisions for little or no paving and few, if any, small structures (please refer to changes to Section 3.3.2 of the General Plan that incorporate these provisions). This type of development is not considered an irreversible commitment of the resource. Further, new

Guideline AO-3.2-2 establishes the goal of implementing future natural vegetation restoration at such future time when existing and proposed recreation uses are no longer needed to help meet the recreation objectives of the Department or recreation needs of the region. In addition, the proposed recreational uses would not affect the viability of agriculture on nearby properties for the same reasons described above. Based on these new policies and the rural recreation nature of the planned uses, the resource value of the land or region would not be diminished, nor would future cultivation of the property be precluded when the need for recreation no longer exists. In summary, the proposed recreational improvements would be sufficiently limited in nature such that it would be feasible to return the lands to another resource-based use, such as agricultural production, at some future time.

### **Land Use Compatibility with Agriculture**

There is a long history related to the compatibility of outdoor recreational uses and agriculture. A great deal of outdoor recreation takes place on farmland. On private lands, those enjoying these recreational opportunities may be the farmers themselves, friends, or visitors. In many areas, farmers supplement their income by charging to hunt or fish on their property, and in some cases, they take actions to increase the abundance of wildlife in order to attract business. Wildlife-associated recreation is an important source of income for many small agricultural communities. According to the American Farmland Trust, low-impact recreational uses such as hunting, fishing, hiking and camping may be acceptable under some easements at the discretion of the landowner.

The proposed outdoor recreational uses at Bidwell-Sacramento River State Park would be compatible with agriculture, based on existing state and federal laws and programs for farmland protection, as described below.

As described above, the Federal FPPA indicates that non-agricultural uses are urban uses, which detract from agricultural land values in the rating system, while “non-urban uses,” which create or protect agricultural land values, include non-paved parks and recreational areas. Based on the characteristics of the proposed low-intensity, outdoor recreation at the Park, they are non-urban uses and in the category of uses that the FPPA considers to be protective of and compatible with agricultural values.

At the State level, the California Land Conservation Act of 1965 (Williamson Act), which enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use, provides valuable insight into the land use compatibility issue and preservation of agricultural values. (None of the properties included in the proposed General Plan are under Williamson Act contract, but the provisions of the act provide insight into the issue of compatibility of outdoor recreation issues with agriculture.) The Williamson Act contains numerous provisions that recognize the compatibility between

agricultural and recreation/open space uses. The definitions included in the statute are the first indication of such compatibility. It defines an “agricultural preserve” as an area devoted to either: agricultural use, recreational use, open space use, or any combination thereof (California Government Code §51201(d)). Also, “recreational use” is defined as the use of the land in its agricultural or natural state by the public, with or without charge, for a range of listed uses, including, but not limited to walking, hiking, picnicking, camping, swimming, boating, fishing, and other outdoor sports (California Government Code §51201(n)). Finally, “compatible use” is defined as any use determined to be compatible with the agricultural, recreational, or open space use of the land within the preserve (California Government Code §51201(e)) The recreational uses proposed in the General Plan are considered compatible with agriculture and therefore should have no significant adverse effects on neighboring farmland production.

These definitions are reinforced in §52105 of the Williamson Act, which states that land devoted to recreational use...may be included within an agricultural preserve (California Government Code §51205). In outlining the purpose of the Williamson Act, the statute states that the discouragement of premature and unnecessary conversion of agricultural land to urban uses is a matter of public interest (California Government Code §51220(c)); there is no reference to other non-urban uses, such as low-intensity rural outdoor recreation, such as that proposed in the General Plan. The clearest evidence for compatibility between agriculture and the type of recreational uses proposed at the Park are found in the principles of compatibility presented in §51238.1 of the statute. It states that uses approved on contracted lands, such as those proposed in the General Plan, will not significantly compromise the long-term agricultural capability of the subject contracted parcel in agricultural preserves (California Government Code §51238.1(a)(1)). As explained above, the proposed land uses and associated goals/guidelines in the General Plan strive to maintain physical conditions of the land that create resource values, including future agricultural and open space capabilities.

### **CONSISTENCY WITH THE RESOURCES AGENCY POLICY MEMO**

In a memorandum to its departments, dated May 4, 2005, The Resources Agency described its policy for all departments to “recognize the importance of both permanent preservation of productive agricultural land and restoration, protection, and management of the state’s natural, historic, and cultural resources.” In selecting and developing resource-related projects, departments “should consider ways to reduce effects on productive agricultural land.” To minimize these effects departments should review the mitigation strategies presented in the CALFED Final Programmatic EIS/EIR (CALFED 2000) and incorporate those strategies or similar strategies, where appropriate.

The General Plan is consistent with The Resources Agency policy memorandum concerning productive agricultural land and restoration of natural resources and with the CALFED

strategy examples for minimizing effects on agricultural lands with the addition of Goal AO 3.3. This new Goal states: "In recognition of the importance policy of both permanent preservation restoration, protection, and management of the state's natural, historic, and cultural resources and of productive agricultural land , the Department will incorporate the following measures as modeled on the CALFED agricultural land and water strategies."

The CALFED strategies that would be most compatible with the Goals, Guidelines and Vision found in the General Plan include the following:

1. Site and align Program features to avoid or minimize impacts on agriculture.
2. Restore existing degraded habitat as a priority before converting agricultural land.
3. Focus habitat restoration efforts on developing new habitat on public lands before converting agricultural land.
2. Examine structural and nonstructural alternatives to achieving project goals in order to avoid impacts on agricultural land.
15. Use a planned or phase habitat development approach in concert with adaptive management.
16. Minimize the amount of water supply required to sustain habitat restoration acreage.

### **Socioeconomic Considerations**

While social and economic consequences are not in of themselves environmental impacts under CEQA, this section discusses socioeconomic considerations related to agricultural production resulting from implementation of the proposed General Plan, in keeping with The Resources Agency policy.

Agricultural production supports considerable economic activity in Butte and Glenn Counties. The value of agricultural production is approximately \$290 million annually in Butte County and \$280 million annually in Glenn County. In 2000, the amount of crop land harvested was 480,000 acres in Butte County and 460,000 acres in Glenn County (CBDA 2005).

Currently, the total amount of important agricultural land within Bidwell-Sacramento River State Park is approximately 36.5 acres (4.8 acres at Irvine Finch, 1.0 acre at Indian Fishery, and 30.7 at the Singh property). An additional 32.8 acres (18.7 acres on the Beard property and 14.1 acres on Sunset Ranch) would be added if these properties are acquired by State Parks. Although roughly 41 acres on the Brayton property, already acquired by State Parks, is planted and irrigated in walnuts, it is not designated as Important Farmland under the FMMP. However, if the Brayton property was included as Important Farmland, the total area evaluated as agricultural land would be approximately 110 acres. If this total acreage was

removed from production for native vegetation restoration or rural outdoor recreation uses, it would constitute a very small portion of total agricultural land in the two counties (about 1/100<sup>th</sup> of one percent). Reducing agricultural production value by this proportion would have a minor, if not unnoticeable, economic effect in the two counties. The cessation of agricultural production can also cause an indirect economic ripple effect on secondary service and supply businesses supporting agriculture. Because of the very small relative contribution of the state park land to agricultural production in the two counties, the combined direct and indirect economic effect of removing agricultural production from these lands would be minor.

## Conclusion

Based on the information and evidence presented above, the Department concludes that the restoration of designated Farmland to natural vegetation or use of designated Farmland for the proposed rural outdoor recreation uses in the proposed General Plan would not result in potentially significant adverse impacts within the intended meaning of CEQA and the CEQA Guidelines. Permanent conversion of the properties to urban uses resulting in a loss of farmland as a resource, significant damage to soil values of the resource, detraction from the agricultural land values in the NRCS Farmland Conversion Impact Rating System, or indirect adverse primary or secondary (such as growth-inducing) effects on adjacent agricultural land would not occur. Also, the planned habitat restoration and low-intensity outdoor recreation uses on these properties do not result in a significant adverse change to the physical resources that provide soil and open space values to the land or an irreversible loss of such resources. Consequently, the General Plan impact on agricultural resources would not result in a significant adverse effect on the environment. Nevertheless, the General Plan includes a goal and attendant guidelines to promote consistency with the Resources Agency policy strategy to consider socioeconomic effects to agricultural land.

Impact  
AG

### **Conversion of Important Farmland to Non-Agricultural Uses:**

Implementation of the General Plan may result in the conversion of lands designated as Important Farmland that are currently in agricultural production to non-agricultural uses. Because there are no measures available to avoid or minimize this conversion as properties are added to the State Park system, this would be a **significant and unavoidable impact**.

As shown in Exhibit 2-4, portions of the Park are designated as *Important Farmland*, under the Farmland Mapping and Monitoring Program. These areas include the Irvine Finch subunit and the Beard Addition, both of which are classified as “Prime Farmland,” and the Singh Orchard Addition, which is classified as “Irrigated Farmland” (an interim farmland map category that substitutes for the *Important Farmland* categories where a modern soil survey is not available). It should be noted, however, that the Irvine Finch subunit is a developed

recreation facility that is predominantly paved, and thus, would not likely meet the criteria for Important Farmland classification if reviewed in the context of existing conditions; as such, it is excluded from further evaluation. The Beard and Singh orchards are currently in production. Neither of these, nor the other Park properties, are under a Williamson Act contract, and State lands are not subject to local agricultural zoning.

In terms of proposed project features, the Singh Orchard addition is not planned for development and would likely be restored to riparian habitat and linked with the other Big Chico Riparian Area properties through the development of a loop trail. The Beard addition may be developed with an overnight campground, which would be integrated with the Irvine Finch River Access area. Because the Department would not continue agricultural production on these properties, in both cases, *Important Farmland* would be converted from agricultural to non-agricultural land uses, which would be a significant effect according to Appendix G of the CEQA Guidelines. Because no mitigation measures are available to address this issue, it is considered a significant and unavoidable impact.

It should be noted that restoring farmland to non-agricultural uses represents a return to its original (or natural) condition. In addition, there are long-term natural process and function benefits of habitat restoration:

Native riparian habitat has been dramatically reduced because of its conversion to agricultural and flood protection uses (e.g., channelization of the river with rip-rap for bank protection and levees for flood control). Taking lands out of agricultural production and restoring riparian habitat along the Sacramento River would increase animal and plant biodiversity and preserve sensitive species, and these are an important part of the Department's mission. Restoration also creates open space, which improves the aesthetics of scenic vistas and affords recreational opportunities (e.g., hiking, nature viewing and interpretation). Moreover, agricultural lands converted for riparian restoration purposes are generally flood prone and thus of marginal economic value in terms of agricultural production; such conversion would lessen the capital costs of flood protection and recurring costs of debris clean up following flood events.

Changes in land uses pursuant to the proposed General Plan could also indirectly affect adjacent agricultural operations, including agricultural uses on *Important Farmland*, if proposed facility development and resource management efforts conflict with or interrupt surrounding agricultural-based land uses. Implementation of Goal AO-4.4 and supporting Guidelines AO-4.4-1 through AO-4.4-3 would avoid or minimize such land use conflicts or incompatibilities through the use of appropriate signage/fencing, and review of development and resource management projects in the context of surrounding land uses. Therefore, there would be no additional indirect impacts to agricultural resources.

**PAGE 4-34, 5TH PARAGRAPH:**

Although not selected as the “environmentally superior alternative,” ~~t~~The proposed General Plan was selected as the preferred project alternative because it balances the interests of natural, cultural, and recreational resources at the Park. It is based on fundamental principles of land and resource stewardship, which are found throughout the goals and guidelines of the Plan. Moreover, it provides the framework to establish improved and expanded recreation opportunities to Park visitors all within a context of resource protection and stewardship, which is an integral consideration for State Parks planning.

**EXHIBITS (GLOBAL):**

(All exhibits using the aerial base map photography are revised to include the date of the photograph used (1999).

**NEW EXHIBIT 2-11:**

A new exhibit, Exhibit 2-11, has been added to the document in response to comment 6.3. This exhibit shows the Pine Creek Preserve concept developed by TNC in their *Sacramento River Public Recreation Access Study* (2003). (Please refer to page 4-4).

## **4.2 DEPARTMENT STAFF-DIRECTED CHANGES**

**PAGE 1-3, 1ST PARAGRAPH, 2ND FULL SENTENCE:**

Due to the possible overlapping areas in deeds and conveyances, and the resultant clouding of titles between the California Department of Parks and Recreation ~~the State~~ and the County, a decision was made in 1950 that the State would convey its land holdings to the County and thereby merge the deeds.

**PAGE 2-9, EXHIBIT 2-1C:**

(Exhibit 2-1C has been revised to remove the building shown on DFG property.)

**PAGE 2-30, 1ST PARAGRAPH:**

**Agricultural Resources of Bidwell-Sacramento River State Park**

Much of the soil in the region is ~~considered prime which is why~~ rich alluvium deposited over thousands of years of seasonal flooding through the historic, lush riparian forests. ~~s~~Substantial amounts of native riparian forest vegetation have been cleared for commercial agriculture, because these soils also have exceptional value for growing crops. These alluvial soils are rated as Pprime soils for agriculture and are reflected in the mapping of “Important Farmland” under the Farmland Mapping and Monitoring Program (FMMP) administered by the California Department of Conservation (DOC) (Exhibit 2-4). Important Farmland is

defined as “Prime Farmland,” “Farmland of Statewide Importance,” “Unique Farmland,” or “Farmland of Local Importance” as mapped by the DOC; it also includes “Irrigated Farmland” and “Non-Irrigated Farmland” for areas where modern soil survey information does not exist as is the case in Butte County.

Table 2-4 shows the breakdown of FMMP farmland designations at the Park. Approximately 12.72.8 percent% of the existing Park area is considered to be *Important Farmland*, virtually all of which is represented by “Prime Farmland” at the Irvine Finch River Access area and “Irrigated Farmland” portions of the Singh addition, which is currently in active commercial agriculture (orchard production) (DOC 2000). However, the *Irvine Finch* subunit has been developed in recreational uses, and a portion of the area includes including paved parking areas, which render it more urban/developed rather than agricultural-based in nature. The *Brayton* property is designated as “Other Land;” however, along with the *Singh* property, it is in active orchard production. The other existing subunits on the east side of the river are classified primarily as “Other Land.”<sup>3</sup>, which is intended to represent land not included in any other mapping category and includes riparian areas not suitable for livestock grazing.

**Table 2-4  
Farmland Designations**

Subunit	Map Designations in Project Area (in acres)				
	Prime (P)	Local Importance/ Potential (LP)	Other Land (X)	Water (W)	Irrigated Farmland <sup>1</sup> (U)
<b>Existing Subunits</b>					
<i>Irvine Finch</i>	4.8	--	--	0.4	--
<i>Pine Creek</i>	--	--	4.8	--	--
<i>Indian Fishery</i>	--	0.6	99.5	0.3	0.4
<i>Big Chico Creek Riparian Area</i>	--	--	95.3	1.5	--
<i>Brayton</i>	--	--	41.0	0.2	--
<i>Singh</i>	--	--	3.2	--	30.7
<b>Potential Property Additions</b>					
<i>Beard</i>	18.7	--	--	0.5	--
<i>Sunset Ranch</i>	--	--	17.6	--	14.1
Source: California Department of Conservation (Farmland Mapping and Monitoring Program) 2000, EDAW 2004.					
<sup>1</sup> Represents an interim farmland category. For farmed areas lacking modern soil survey information and for which there is expressed local concern on the status of farmland, interim farmland categories substitute for the categories of Prime Farmland (P), Farmland of Statewide Importance (S), Unique Farmland (U), and Farmland of Local Importance (L).					

<sup>3</sup> “Other Land” is defined under the FMMP as land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or agriculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than forty acres is mapped as Other Land.

# Bidwell-Sacramento River State Park

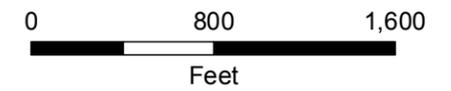
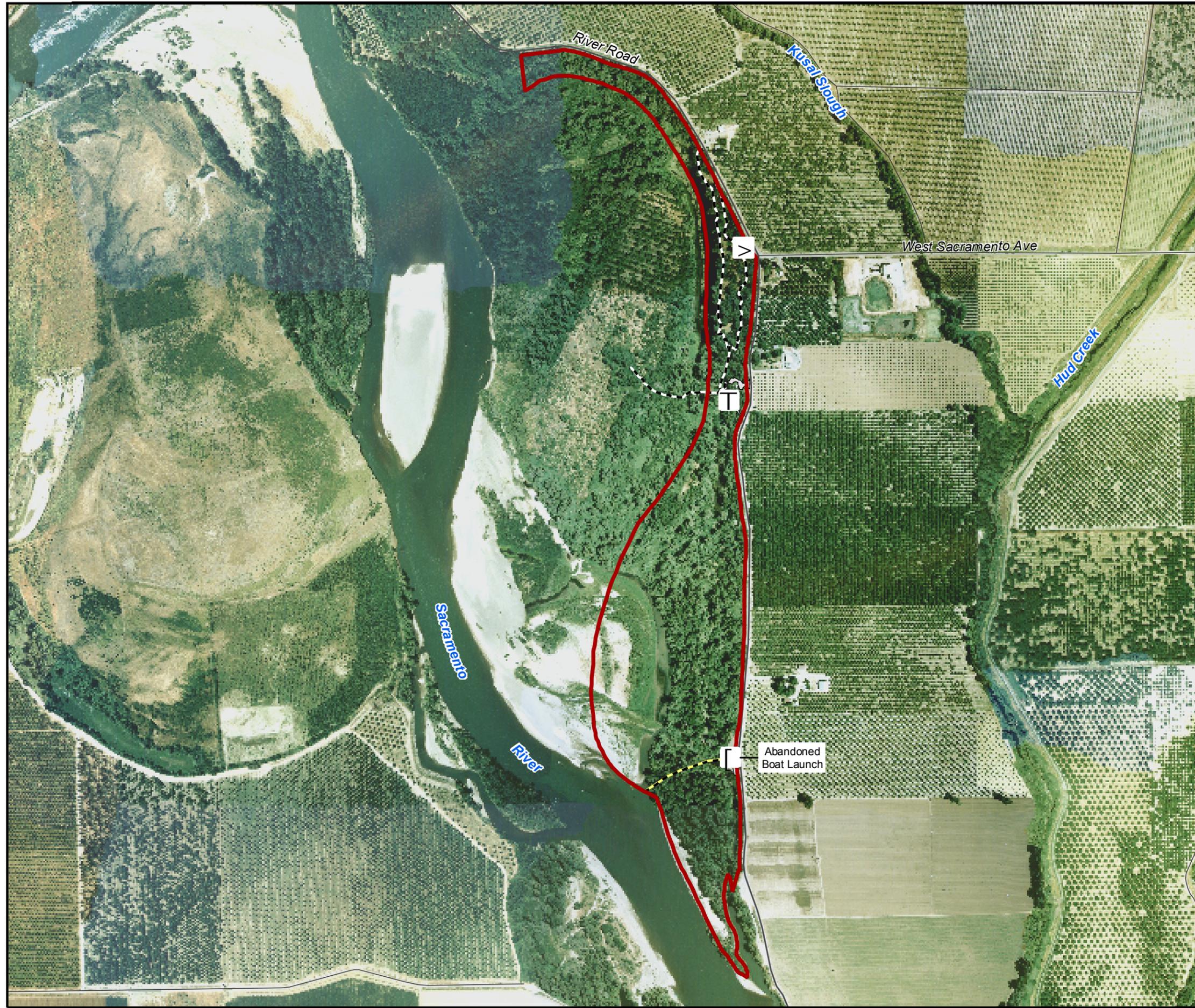
## EXHIBIT 2-1C INDIAN FISHERY

### LEGEND

-  Indian Fishery Subunit Boundary
-  Informal Trail
-  Trail
-  Major Roads
-  Roads
-  Parking Area

### Facilities

-  Administrative Center
-  Boat Launch
-  Day-Use Area
-  Building



\* Aerial photograph as of 1999



Sources: GIC 2003, DPR 2003

Sep. 14, 2005



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Important Farmland is also found at the potential property additions considered in the General Plan. Nearly all of the Beard property is considered to be "Prime Farmland," and it is currently in orchard production. The other property additions are located in Butte County, where modern soil survey information is not available. Therefore, the FMMP classifications have not yet been applied to property in Butte County. Based on soil conditions and agricultural use, lands shown as "Irrigated Farmland" in Butte County are likely to be categorized as "Prime Farmland," "Farmland of Statewide Importance," "Unique Farmland," or "Farmland of Local Importance" when the FMMP criteria are applied. The "Irrigated Farmland" designation applies to the eastern portion of the Sunset Ranch property (east of the existing access road). When the property additions are evaluated in conjunction with the existing subunits at the Park, roughly 20.6 percent of the potential Park area is considered to be Important Farmland<sup>4</sup>.

### **Agricultural Land Use and Economic Conditions in Butte and Glenn Counties**

Agriculture is the dominant economic enterprise in the northern Sacramento Valley. Areas close to the Sacramento River primarily support orchard crops. In 2000, Butte County and Glenn County harvested 480,000 and 460,000 acres of cropland, respectively. The primary agricultural commodities were, rice, almonds, walnuts, dairy products, prunes, and peaches (CBDA 2005). The agricultural sector employs approximately 3,000 workers and produces \$291 million in economic activity in Butte County, and employs approximately 1,520 workers and produces \$281 million in economic activity in Glenn County (USFWS 2005).

#### **PAGE 2-33, EXHIBIT 2-4:**

(Exhibit 2-4 has been revised to include a footnote explaining the interim farmland mapping categories included on the exhibit.)

#### **PAGE 2-66, 1ST PARAGRAPH:**

Apart from the more broad-based findings of the work of Treganza, Chartkoff and Chartkoff, Riddell and Olsen, Ritter and Kowta, more locally focused archaeological investigations have occurred in the immediate vicinity of Bidwell-Sacramento River State Park.

#### **PAGE 2-69, 3RD PARAGRAPH:**

While wheat was the primary crop during the early agricultural period, the crop was slowly replaced with orchards between 1883 and 1900, which is representative of a boom/bust cycle of a wheat industry.

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<sup>4</sup> This percentage does not include the Brayton property because it is not designated as one of the Important Farmland categories, although it has historically been in agricultural production.

**PAGE 2-70, 1ST PARAGRAPH:**

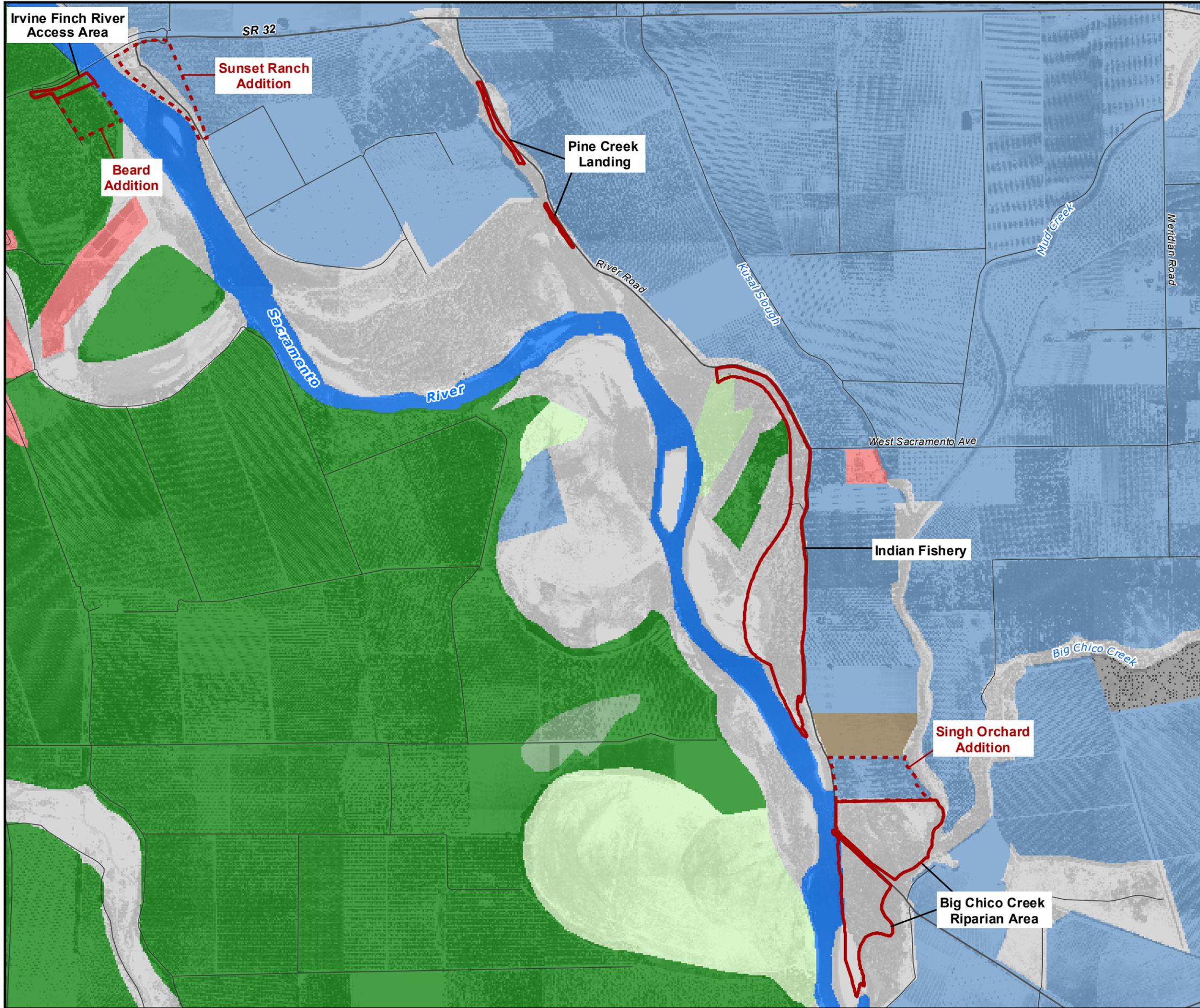
With completion of the California and Oregon Railroad to Chico in July of 1870, a faster and more efficient means of bringing produce and cattle to market came with it. Although railroads were being built in the Central Valley of California during the 1850s and 1860s, rail lines were not built into the vicinity of the Park until the early 1870s. The California and Oregon Railroad (a subsidiary of the Central Pacific) finally extended its lines from Marysville to Chico in the summer of 1870 (White 2003:50-51). As the area became more connected by rail to Sacramento, commercial river traffic soon decreased. One of the more notable lines in the area was the Northern Electric Railroad (Sacramento Northern), which connected Chico directly with Sacramento. This line ceased to exist as a separate company in 1921 when it was absorbed by the Southern Pacific Railroad, which still operates in the area today as the Union Pacific Railroad.

**PAGE 2-72, 2ND PARAGRAPH:**

While more than 50% of the Park as currently defined has been inventoried for cultural resources, very little is known about the archaeology of the Park and the surrounding area. These investigations have failed to identify resources within the current Park boundaries, but have located six prehistoric sites (CA-But-12, CA-But-189, CA-But-191, CA-But-300, CA-But-402, CA-But-717) and an historic water transmission facility (CA-But-1352) within one-mile of the Park. Given the limited number of cultural resources documented within and in the immediate vicinity of the Park, the general archaeological sensitivity within the Park is considered to be moderate. It is likely that the general area was not necessarily intensively inhabited or utilized by early Native American populations. The dynamic nature of the Sacramento River may have destroyed sites or dramatic seasonal flooding and channel shifts may have made this portion of the river unsuited to large-scale prehistoric use and settlement, limiting traces of Native American activity on the landscape.

**PAGE 2-75, 2ND PARAGRAPH:**

Over the last 140 years, historic agriculture has resulted in the leveling and re-contouring of large portions of the Park and the region east and west of the river. Although the leveling and re-contouring of large portions of the park could be an element of a cultural landscape, additional research would be necessary to further document this phenomenon. However, without significant related traces of the historic nature of such activities (houses, barns, etc.), there would be little to distinguish this area from other similar agriculturally-impacted portions of the Central Valley. Of the documented prehistoric archaeological sites near the Park, CA-But-189 appeared to have been severely affected by leveling in 1973 (Manning 1983). The site of CA-But-1353, a sparse scatter of flaked stone, and a late prehistoric/early historic era Konkow/Maidu occupation site (CA-But-717), may remain relatively intact with only minor disturbance. A record of recent visits assessing the condition of CA-But-12, CA-But-191, CA-



# Bidwell-Sacramento River State Park

## EXHIBIT 2-4 DESIGNATED FARMLAND

**LEGEND**

- Bidwell-Sacramento River State Park
- Potential Property Additions (In discussion with landowners)
- Major Roads
- Roads

Farmland Classifications (Dept. of Conservation)

- Prime Farmland
- Farmland of Statewide Importance
- Farmland of Local Importance
- Grazing Land
- Urban and Built-Up Land
- Other Land
- Water

Interim Farmland Classifications<sup>1</sup>

- Irrigated Farmland
- Non-Irrigated Farmland

N

0      2,000      4,000  
Feet

0      0.5      1  
Miles

\* Aerial photograph as of 1999

<sup>1</sup> For farmed areas lacking modern soil survey information and for which there is expressed local concern on the status of farmland, the following categories substitute for the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. (Butte County only)

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But-300 and CA-But-402 was not on file at the Northeast Information Center. The single historic site recorded within the vicinity of the Park consists of the remains of a water pumping and intake structure, pump house, and small residence located on Big Chico Creek. This site is still extant and appears largely undisturbed from the time of its original documentation.

**PAGE 2-75, 3RD PARAGRAPH:**

Additional resources, not formally ~~formerly~~ documented within the current Park boundaries include the location of the Giannelli Bridge; a rotating draw bridge, situated at the Sacramento River-SR 32 crossing. Remains of a Sea Scout station related to the World War II home defense effort is situated at the Pine Creek Landing. Another site that may be located near the current Park includes the remains of the Tyler Dance Hall, dating to the early 1900s (McGaugh, pers. comm., 2002; McGaugh et al. 1997).

**PAGE 2-97, SECTION 2.3:**

**2.3 NEW AND POTENTIAL PROPERTY ADDITIONS CONSIDERED IN THE GENERAL PLAN**

The Department is actively engaged in ~~There are ongoing~~ property acquisition negotiations ~~by the Department that affect~~ pertain to the Park. Based on the dynamic nature of these efforts, the Department felt that it was appropriate to include several potential property acquisitions in the Preliminary General Plan; ~~process.~~ They include the Beard Property, Sunset Ranch, and Singh Property Orchard. These properties have not been inventoried and evaluated to the same degree as the existing Park subunits; however, sufficient information has been collected to adequately evaluate their inclusion in the proposed General Plan and DEIR. Goals and guidelines are included in the proposed General Plan that address the need for property-specific data collection and integration into the planning and administrative processes associated with the Park. ~~These property additions would increase the size of the Park by roughly 30% to nearly 275 acres.~~

Since the release of the Preliminary General Plan in December 2003, the Singh Property and Brayton Property (not included in the Preliminary General Plan) have been acquired by the Department and added to the Park. Although the Brayton Property was not included in the Preliminary General Plan, it was evaluated in the context of the DEIR and addressed in responses to comments included in the FEIR. The other properties are still being considered for acquisition, but are not expected to be officially added to the Park as of the expected release of the Final General Plan in mid-2005. The status of the new and potential property additions is summarized below.

### **2.3.1 NEW PROPERTY ADDITIONS SINCE THE RELEASE OF THE PRELIMINARY GENERAL PLAN**

#### **SINGH PROPERTY**

The Singh Property was acquired from TNC in August 2004 for the explicit purpose of adding it to the Park. This property, which is roughly 34 acres in size, is located directly north of the Big Chico Creek Riparian Area on the east side of River Road. Historically, this property was used for orchard production. Walnut trees represent the main vegetation type on the property. There are no developed facilities on the property, except for irrigation water appurtenances. The addition of this property represents an expansion of the Big Chico Creek Riparian Area, with a focus on conservation and habitat restoration uses that are comparable with existing uses on Park property to the south.

#### **BRAYTON PROPERTY**

The Brayton Property, acquired by the Department in late 2004, is roughly 40 acres and is located immediately north of the Indian Fishery subunit. Its location provides access to both the Sacramento River and Pine Creek. Similar to the Singh Property, the Brayton property was historically used for orchard (walnut) production. There are no developed facilities on this property. Based on its location, this property represents an extension of the Indian Fishery area with a focus on river access and low-intensity recreation and restoration uses.

### **2.3.2 POTENTIAL PROPERTY ADDITIONS**

#### **2.3.1-BEARD PROPERTY**

The Beard Property is currently owned by the River Partners, who purchased this property with State Wildlife Conservation Board funds for habitat restoration, river access, and possible recreation uses, including an overnight campground and day-use area. The property is being considered by River Partners as a gift to the Department as an addition to Bidwell-Sacramento River State Park.

This property is approximately 20 acres in size and located directly south of the Irvine Finch River Access area. It is currently being used for agricultural purposes, namely walnut orchards. There are no developed facilities on the property, but it is served by irrigation water. Based on its proximity, if this property is added to the Park, it would be integrated with the Irvine Finch facility to provide expanded recreational opportunities to park visitors.

#### **2.3.2-SUNSET RANCH**

Sunset Ranch is currently owned by TNC, which is considering donating the property to the Department or other land management agency or selling it to a private interest. The Department is considering whether to accept the donation and add the property to the Park as a new subunit. This property was split from larger parcel, the remainder of which has been transferred to the USFWS. In the interim, TNC is using the parcel to support their habitat restoration activities in the region.

The portion of the Sunset Ranch property that is being considered for addition to the Park is roughly ~~31.813.6~~ acres, and is located directly across the Sacramento River from the Irvine Finch subunit, south of SR 32. Although situated directly on the river, river access is limited, but high-quality views are available. The property is served by a paved access road with gate, which also provides access to private landowners located further south on the river. There are several structures on the property, including a residence, several barns, and other miscellaneous buildings. Utilities, including a water well and utility lines, already serve the property. For the most part, vegetation on the property is sparse and disturbed, particularly on the east side of the access road; there is riparian vegetation located along the riverbank on the west side of the property. If added to the Park, this property would likely become its own subunit.

### ~~2.3.3 SINGH ORCHARD~~

~~Singh Orchard is currently owned by TNC and is planned for purchase by the Department with Proposition 40 bond funds for the explicit purpose of adding it to the Park. The property is currently in the State's appraisal process.~~

~~Singh Orchard is located directly north of the Big Chico Creek Riparian Area on the east side of River Road and is roughly 34 acres in size. Similar to the Beard Property, Singh Orchard is currently being used for orchard production and walnut trees represent the main vegetation type on the property. There are no developed facilities on the property, except for irrigation water facilities. If this property is added to the Park, it would represent an expansion of the Big Chico Creek Riparian Area, and would have a focus of conservation and habitat restoration similar to the ongoing efforts at the Park to the south.~~

### **PAGE 2-98, 2ND PARAGRAPH:**

The portion of the Sunset Ranch property that is being considered for addition to the Park is roughly ~~31.813.6~~ acres, and is located directly across the Sacramento River from the Irvine Finch subunit, south of SR 32.

### **PAGE 3-7, OVERALL GOAL ER-2:**

**Overall Goal ER-2:** Protect the significant cultural resources within the Park, providing interpretive and educational opportunities, where feasible.

### **PAGE 3-7, 3RD PARAGRAPH:**

~~Given that only roughly 50 percent of the park was surveyed for the present lack of a comprehensive assessment of prehistoric and historic resource locations within and in the vicinity of the Park, the compilation of a cultural resources data base is critical. Because the most important step in the preservation of cultural resources is acquiring detailed information on their locations, conditions, and cultural and temporal associations, the development of~~

~~this such~~ data is an integral component to the protection of cultural resources in the Park, and associated interpretive efforts.

**PAGE 3-10, GUIDELINE ER-4.1-2:**

**Guideline ER-4.1-2:** ~~Establish~~ Provide visual screening of existing and proposed facility developments that are visible from the river or shoreline using ~~native natural~~ vegetation wherever possible.

**PAGE 3-12, OVERALL GOAL VU-1:**

**Overall Goal VU-1:** Provide recreational opportunities associated and compatible with the unique resources of the Sacramento River and its riparian and Oak Woodland environments.

**PAGE 3-13, GUIDELINE VU-1.3-2:**

**Guideline VU-1.3-2:** Maintain or expand existing day-use areas throughout the Park as demand warrants and environmental constraints allow. Assess opportunities for linkage of existing and proposed day-use areas and other facilities proposed as part of this Plan where appropriate.

**PAGE 3-24, NEW GUIDELINE AO-1.2-4:**

**Guideline AO-1.2-4:** Collect applicable baseline data related to natural, cultural, and other resources as properties are added to the Park to facilitate integration into existing management efforts.

**PAGE 3-29, GOAL AO-4.3:**

Text of Goal AO-4.3 is unbolded.

**PAGE 3-30, LAST PARAGRAPH (SECTION 3.3):**

The previous sections of this General Plan focus on goals and guidelines specific to issues or topics common to the management of sState Parks.

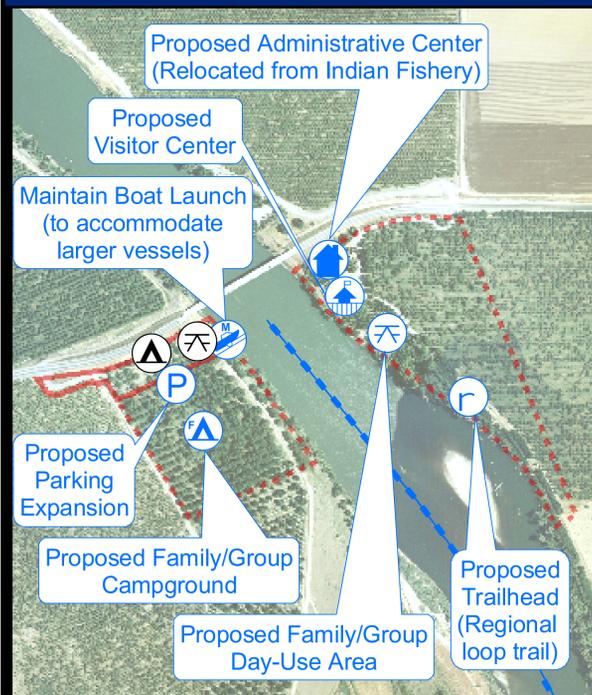
**PAGE 3-33, EXHIBIT 3-1:**

Exhibit 3-1 has been revised to reflect the current status of Park boundaries.

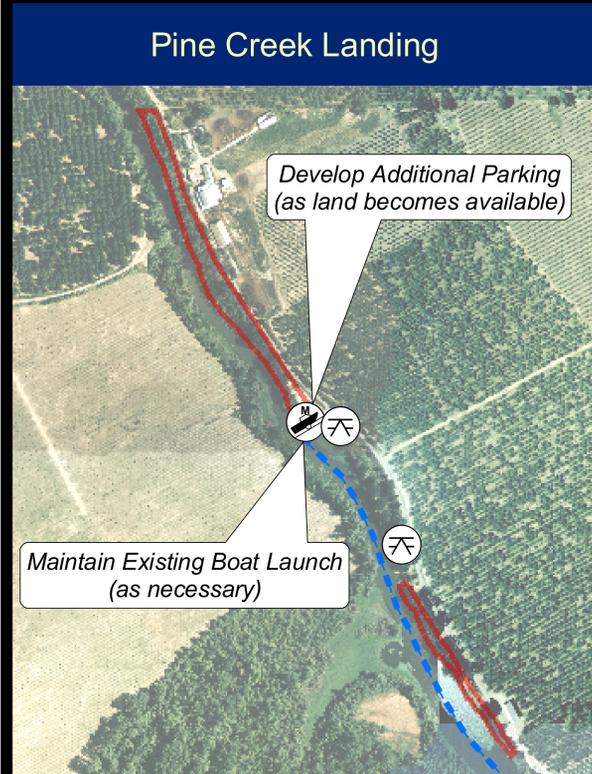
**PAGE 3-36, 1ST PARAGRAPH:**

As described in Section 2.3, the Department is currently considering the addition of the Sunset Ranch property located just east of the Sacramento River, south of SR 32, and as such, it has been included in the General Plan planning process. The characteristics of this property, namely its proximity to SR 32 and the Sacramento River, ~~as well as the fact that it~~

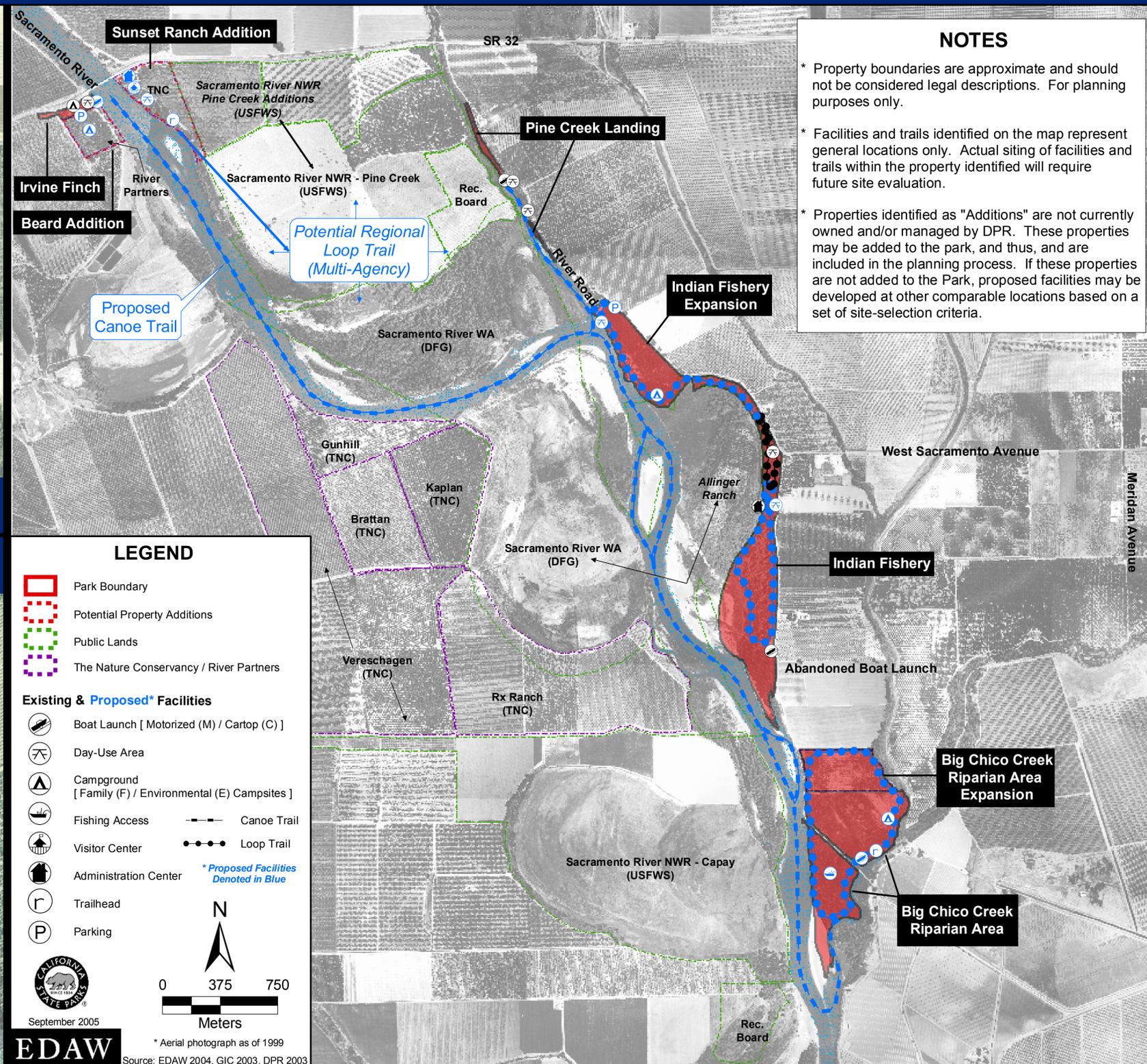
# BIDWELL-SACRAMENTO RIVER STATE PARK



Irvine Finch Recreation Area & Sunset Ranch Addition



Pine Creek Landing

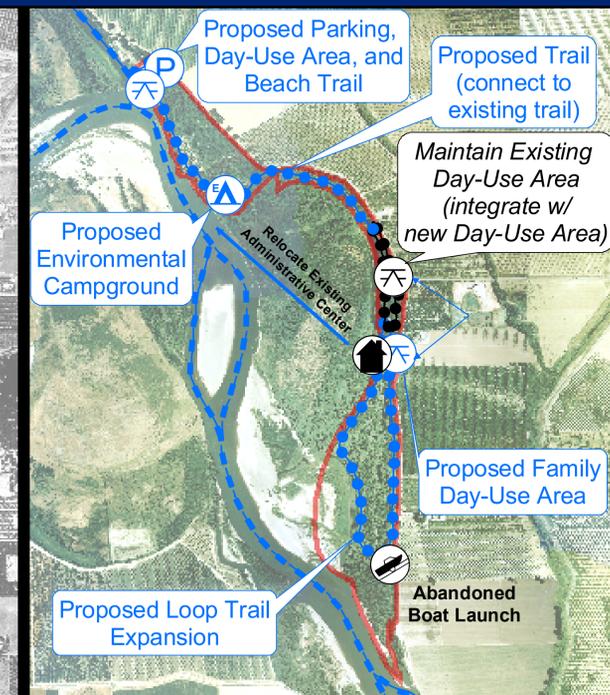


## NOTES

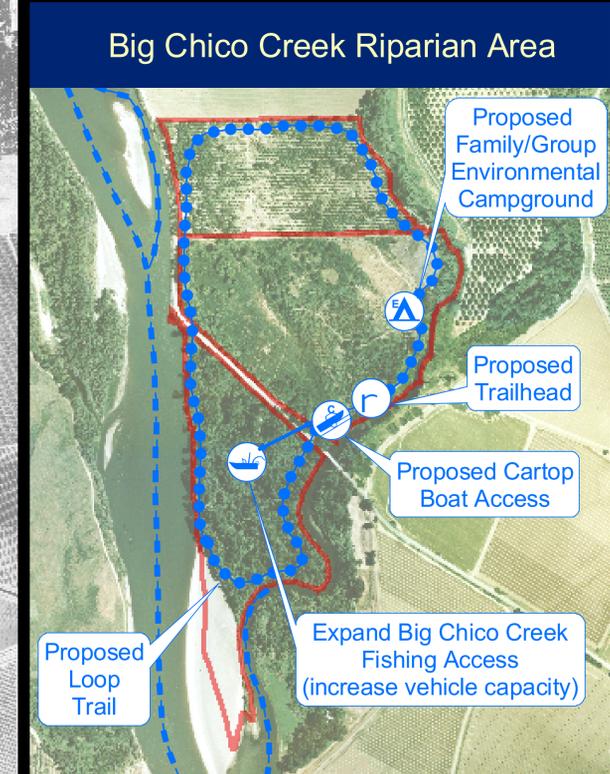
- \* Property boundaries are approximate and should not be considered legal descriptions. For planning purposes only.
- \* Facilities and trails identified on the map represent general locations only. Actual siting of facilities and trails within the property identified will require future site evaluation.
- \* Properties identified as "Additions" are not currently owned and/or managed by DPR. These properties may be added to the park, and thus, and are included in the planning process. If these properties are not added to the Park, proposed facilities may be developed at other comparable locations based on a set of site-selection criteria.

## LEGEND

- Park Boundary
  - Potential Property Additions
  - Public Lands
  - The Nature Conservancy / River Partners
- Existing & Proposed\* Facilities**
- Boat Launch [ Motorized (M) / Cartop (C) ]
  - Day-Use Area
  - Campground [ Family (F) / Environmental (E) Campsites ]
  - Fishing Access
  - Visitor Center
  - Administration Center
  - Trailhead
  - Parking
  - Canoe Trail
  - Loop Trail
- \* Proposed Facilities Denoted in Blue
- September 2005
- EDAW
- \* Aerial photograph as of 1999  
Source: EDAW 2004, GIC 2003, DPR 2003



Indian Fishery



Big Chico Creek Riparian Area

# GENERAL PLAN

## EXHIBIT 3-1 LAND USE AND FACILITIES



~~contains predominantly non-native vegetation,~~ lends this property to exceptional opportunities for new recreational and interpretive facilities. ~~This~~ The western portion of this property (west of the existing access road) is envisioned as the primary day-use destination for the northern portion of the Park, potentially serving a broad range of visitor-types and catering to both planned destination and en-route visitors traveling in the region. No developed uses are proposed on the east side of the property (east of the existing access road); this area is currently planned to be restored to native habitat by The Nature Conservancy (TNC). Facilities being considered at Sunset Ranch include a visitor center, day-use area, and trailhead ~~to~~ servicing a multi-agency trail system; it could also serve as the administrative headquarters for the Park and other units in the Valley Sector.

### **PAGE 3-38, INDIAN FISHERY:**

#### **INDIAN FISHERY**

The Indian Fishery subunit consists of the contiguous area that has historically been referred to as Indian Fishery to the north and Old Chico Landing to the south, as well as the Brayton property addition. ~~For the most part,~~ Prior to this addition, Indian Fishery ~~is located further inland providing~~ provided access to an oxbow lake, but it ~~does did~~ not provide direct access to the Sacramento River (although informal trails do connect this subunit to the river at certain locations). With this addition, Indian Fishery provides direct access to both the Sacramento River and Pine Creek. This subunit is envisioned to serve as a centralized access point for visitors accessing the Park on the east side of the river. It could offer both developed and passive recreational opportunities at one general location, thereby appealing to a range of potential visitors. Facilities being considered at this location include ~~a two~~ new family/group day-use areas, primitive camping, and the expansion of the existing loop trail system that would link existing and proposed facilities. In addition, that could be implemented in conjunction with the existing day-use area and potential relocation of the existing administrative facilities could be potentially re-located to another area of the Park.

At the south end (Indian Fishery prior to the property addition), ~~the~~ potential new day-use area could be located at the location of the existing administrative center, which consists of several modular office buildings, which are being considered for relocation. A new day-use area would augment existing day-use facilities located north of the administrative center, and therefore, would be small to moderate in size (e.g., approximately 7–10 family picnic areas) with standard amenities, such as picnic tables, and barbeques. This facility could also be served by flush restroom facilities that could be connected to an onsite wastewater disposal system already developed at the site. In an effort to develop this area as a central point of access to the Park, a developed entrance may be constructed that could potentially consist of an entrance kiosk and/or signage that could be used to better track visitation and provide current information to visitors about the Park and special events. In addition, the existing day-use area located to the north of the proposed facility would be maintained at its current size

in an effort to enhance the prominence of a new day-use area. As the central access point, a new day-use area could serve as the gathering point for interpretive and educational programs and could be developed to accommodate bus parking and turn-around space.

More passive recreational opportunities could also be provided at Indian Fishery through the expansion of the existing trail system. The trail system could be expanded to the south of the existing alignment, thereby providing access to the dense riparian vegetation that characterizes the essence of the Park. Such a trail system could be designed in a loop fashion to expose trail users to the unique resources that vary across the periphery of the property, including the abundant wildlife and scenic vistas that would serve visitors participating in wildlife viewing and other sight-seeing activities. It may also serve as the connector to the informal trails that provide access to the Sacramento River.

On the north end (Brayton property), the existing walnut orchard would be removed and replaced with low-intensity recreation and habitat restoration uses. A new day-use area could be developed in conjunction with a new parking area and trail that leads to the beach area at Pine Creek. The day-use area would be a small to moderately-sized facility (similar to the other proposed day-use area to the south) and would serve visitors that are primarily seeking river access. New pavement will be minimized in areas used for vehicular access and parking. Further south, a small-scale environmental (primitive) campground could be developed with roughly 10 to 20 sites. Vault-style or portable toilets would be used to serve this area. These new facilities could be linked with a linear (i.e., non-loop) trail that could connect to the existing and proposed loop trail to the south. The remainder of the property is envisioned to be restored to native vegetation.

### **Summary of Potential Facilities Considered at Indian Fishery**

- < Relocation of existing administrative center to a more centralized location.
- < New family/group day-use area at the location of the existing administrative center.
- < Ongoing operation and use of existing day-use area.
- < Expansion of existing loop trail system to the southern portion of the subunit.
- < New day-use area, parking, and beach trail on the north end of the Brayton property.
- < Primitive environmental camping in the southwest corner of the Brayton property.
- < Linear trail connecting facilities on the Brayton property and connect to the existing and proposed trail system to the south.

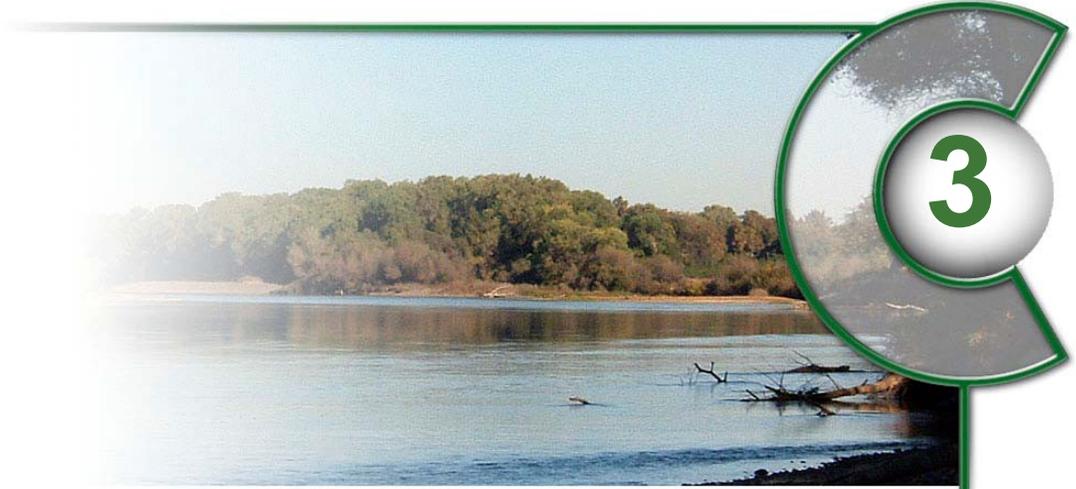
### **PAGE 4-14, 1ST PARAGRAPH:**

Although portions of Bidwell-Sacramento River State Park have been subjected to cultural resource surveys related to transportation, reclamation, and recreation projects, no prehistoric

or historic sites, features or artifacts have been formally documented within the Park. However, several important sites are known to exist (e.g., Bidwell Ferry, Gianelli Bridge, Sea Scout station, Tyler Dance Hall, etc.), but ~~these have not been recorded~~the locations of these sites and features have not been documented using standard archaeological techniques. In addition, based on the presence of significant cultural resources within and in the immediate vicinity of the Park, and the sensitive nature of the landforms present in the area, it is likely that ~~important cultural~~ resources remain to be discovered within Park boundaries, although the extent of such resources and their significance is probably limited based on existing information from surveys and archival research.

## 5 REFERENCES

- American Farmland Trust. 2004. Farming on the Edge. Website: [www.farmland.org](http://www.farmland.org), Glossary of Terms, as accessed on May 7, 2004.
- California Bay Delta Authority. 2005. Sacramento River-Chico Landing Subreach Habitat Restoration Project Draft EIR. (June.)
- California Department of Conservation. 1997. California Agricultural Land Evaluation and Site Assessment Model, Instruction Manual.
- California Department of Conservation. 2004. Important Farmland Categories. Website: [http://www.consrv.ca.gov/dlrp/FMMP/mccu/map\\_categories.htm](http://www.consrv.ca.gov/dlrp/FMMP/mccu/map_categories.htm). Accessed on December 9, 2004.
- California Resources Agency. 2005. Resources Agency Policy on Projects Involving Agricultural Land. (May.)
- Cannon, Tina R. 2004. Farmland Conversion: Should Habitat "Mitigate" to Agribusiness. Association of Environmental Professionals Environmental Monitor. (Summer.)
- Kuminoff, Nicolai V.; Sokolow, Alvin D.; and Sumner, Daniel A. 2001. Farmland Conversion: Perceptions and Realities. Agricultural Issues Center Issues Brief No. 16, University of California, May.
- Manning, James P. 1983. Letter report to Local Agency Formation Commission, Oroville, from B.P. Enterprise Archaeology Consultants, Chico, CA. Northeast Information Center file no. 4-191.
- McGaugh, Richard K., Stephen W. Feazel, William B. Stewart and Richard D. Clark. 1997. Bidwell-Sacramento River State Park, Interpretive Prospectus. Manuscript on file at Northern Butte District, California State Department of Parks and Recreation, Oroville, CA.
- Natural Resources Conservation Service. 1983. Form AD-1006, Farmland Conversion Impact Rating, (October).
- U. S. Fish and Wildlife Service. 2005. Sacramento River National Wildlife Refuge Final Comprehensive Conservation Plan and Environmental Assessment; Finding of No Significant Impact. (March.)



**Comments and Responses to Comments on the  
Recirculated Draft EIR**



# *Bidwell-Sacramento River State Park*

## *Comments and Responses to Comments on the Recirculated Draft Environmental Impact Report*

**SCH# 2003022113**

Arnold Schwarzenegger  
Governor

Mike Chrisman  
Secretary for Resources

Ruth Coleman  
Director of Parks and Recreation

Department of  
Parks and Recreation  
P.O. Box 942896  
Sacramento, CA 94296-001

January 2006





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## ACRONYMS AND ABBREVIATIONS

CBDA	California Bay-Delta Authority
CDF	California Department of Fire and Forestry
CEQA	California Environmental Quality Act
CEQA Guidelines	California Environmental Quality Act Guidelines
CSLC	California State Lands Commission
DEIR	Draft Environmental Impact Report
Department	California Department of Parks and Recreation
DOC	California Department of Conservation
DPR	California Department of Parks and Recreation
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FEIR	final environmental impact report
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FPPA	Federal Farmland Policy Protection Act
GGS	giant garter snake
GIC	Geographic Information Center
HCFPD	Hamilton City Fire Protection District
LESA	Land Evaluation and Site Assessment
NEPA	National Environmental Policy Act
NRCS	Natural Resources Conservation Service
Park	Bidwell-Sacramento River State Park
PM	Public meeting
SR	State Route
SRCA	Sacramento River Conservation Area
SRCAF	Sacramento River Conservation Area Forum
TNC	The Nature Company
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

# 1 INTRODUCTION

This document presents the public and agency comments made on the Recirculated DEIR for Bidwell-Sacramento River State Park (Park), along with responses to significant environmental points raised in those comments. The background of public documents related to the General Plan is summarized below.

## Preliminary General Plan and DEIR

On December 12, 2003, the California Department of Parks and Recreation (Department) released to the general public and public agencies the Preliminary General Plan and Draft Environmental Impact Report (DEIR) for Bidwell-Sacramento River State Park (Park). The proposed General Plan will guide future management direction at the Park over an approximate 20-year planning horizon. It contains a comprehensive and integrated set of Park-wide goals and guidelines for the long-term management of the Park that focus on protection of environmental resources, enhancements to visitor use and recreation opportunities, and improvements to administration and operations of the Park. In addition, the General Plan provides a spatial dimension to Park planning through the use of area concept planning, which includes area-specific management and facility prescriptions for the subunits and potential property additions that have been considered in the planning process. A range of new recreation facilities are proposed at the Park, which include, but are not limited to, overnight campgrounds, day-use areas, trails, and a visitor center.

The DEIR, which is part of the General Plan, contains the environmental analysis of potentially significant effects of the proposed project on the environment. In accordance with the California Environmental Quality Act (CEQA)<sup>1</sup> §21091 and the Guidelines for Implementing the California Environmental Quality Act (CEQA Guidelines)<sup>2</sup> §15087, a 45-day public review period for the DEIR was provided ending January 26, 2004. On January 15, 2004, a public meeting was held in Chico, CA to discuss the General Plan and associated findings in the DEIR, and the public had the opportunity to provide written and oral comments. During the public review period, a number of comments on the environmental issues evaluated in the DEIR were received from public agencies, private groups, and individuals. In addition, comments were also received on the various components of the plan itself. This document provides responses to written and oral comments received during the 45-day public review period.

## Recirculated DEIR Addressing Agricultural Resources

For several reasons, the Department re-evaluated its finding of a significant and unavoidable impact on agricultural resources presented in the original DEIR. As explained below, based on comments from reviewers and a new policy guidance memorandum from the Resources Agency, the Department changed its finding on the conversion of agricultural land to less

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<sup>1</sup> Public Resources Code §§21000–21178.

<sup>2</sup> Title 14, California Code of Regulations, §§15000–15387.

than significant and released a Recirculated DEIR to provide the public with an opportunity to comment on this change.

A number of public comments were provided that addressed the manner in which the DEIR analyzed the effect of the General Plan on agricultural resources. Specifically, one commenter disagreed with the conclusion made in the DEIR that the removal of orchard trees and the subsequent restoration of riparian vegetation and/or development of low-intensity recreation uses represented a significant and *unavoidable* environmental impact to agricultural resources, and indicated the opinion that the use of agricultural/conservation easements could mitigate this impact to a less-than-significant level (Lynnel Pollock, Yolo County, presented at Sacramento River Conservation Area Forum meeting on January 15, 2004).

The environmental analysis in the DEIR had found that the proposed acquisition of two properties (Singh and Beard properties), due to their status as *Important Farmland* under the Farmland Mapping and Monitoring Program (FMMP) administered by the California Department of Conservation (DOC) and the ultimate change in land use on these properties from agriculture to habitat restoration and joint habitat restoration/low-intensity recreation uses in a rural setting constituted a significant environmental impact on agricultural resources, pursuant to the State CEQA Guidelines. Further, because the Department has determined that feasible mitigation measures were not available, the original DEIR indicated that the effect represented a significant and unavoidable environmental impact.

After additional consideration of this impact, the Department determined that the conclusion in the DEIR was based on an incorrect effects analysis. Land use changes, including agricultural land use changes, are not in of themselves significant adverse impacts on the physical environment. The threshold for significance is whether or not an impact to agricultural resources would then result in a significant environmental effect. Therefore, the Department found, in this instance, that the “conversion of designated farmland to non-agricultural uses” in the proposed Bidwell-Sacramento River State Park General Plan would result in a less-than-significant adverse impact on the physical environment within the meaning of CEQA and the CEQA Guidelines, and thus, no mitigation measures are necessary. The evidence that supports changing the significance conclusion for this impact is based on the planned beneficial change in physical conditions of the affected properties, preservation of the soil and open space resource values attributed to agricultural lands, and the compatibility of the proposed land uses in the General Plan with agriculture and other open space uses on or adjacent to the Park.

Since the time the original DEIR was released to the public, the Department has acquired an additional property (Brayton property), which is being integrated into the proposed General Plan. The Brayton property, proposed for low-intensity recreation uses similar to the Beard property, has been historically in orchard production, but it is not designated as Important Farmland (i.e., Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance under the FMMP). In addition, the eastern portion of the proposed Sunset Ranch property addition is considered Important Farmland by virtue of its

designation as "irrigated farmland" in Butte County, but that point was not referenced in the original DEIR. Therefore, the discussion provided in Recirculated DEIR also applied to both of these properties.

Also subsequent to the DEIR, the Resources Agency provided a guidance memorandum to its Departments encouraging Departments to consider, as a matter of policy, including a separate section in Environmental Impact Reports (EIRs) regarding socioeconomic impacts (Resources Agency Memorandum, May 4, 2005). The CEQA Guidelines permit inclusion of such a separate section at an agency's discretion (CEQA Guidelines §15131, "Economic or social information may be included in an EIR or may be presented in whatever form the agency desires.") In addition, the Resource Agency Memo referenced the CALFED strategies for agricultural land and water as "good examples of the types of strategies which could be used." To reflect the Department's sensitivity to agricultural land concerns, the General Plan contains a goal and guideline to consider and implement, as appropriate, measures based on the CALFED strategies. Those policy measures and socioeconomic considerations were reflected in the Recirculated DEIR.

The Recirculated DEIR included public and agency comments on the original DEIR, along with responses to comments that raised environmental points. It also contained proposed changes to the General Plan recommended by Department staff in response to information developed since the release of the Preliminary General Plan and DEIR (Chapter 4 of that document.)

Because of the revised conclusion regarding the agricultural resources issue, the Department elected to recirculate, pursuant to the State CEQA Guidelines §15088.5, those portions of the DEIR addressing whether impacts to agricultural resources result in potentially significant environmental effects. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given but before certification; new information is considered "significant" when the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a potentially substantial adverse effect of the project (CEQA §15088.5(a)). Although the proposed revisions to DEIR resulted in a less-than-significant environmental impact conclusion for the subject impact topic, the Department decided it was important to provide the public the opportunity to review the revised analysis of this issue. In addition, because the proposed revisions only affect portions of the DEIR related to agricultural resources, the recirculated DEIR only included those portions of the document that were modified or had a bearing the related environmental analysis, in accordance with State CEQA Guidelines §15088.5(c).

A 30-day public review and comment period for the recirculated DEIR was established, beginning on October 18, 2005, and ending on November 17, 2005. In response to the public interest in this issue, the Department extended the public review period to January 8, 2006. The Department received additional comments on the Recirculated DEIR and they are included herein, accompanied by responses to significant environmental points raised in them.

## Response to Comment Document

This document presents public and agency comments received during the public review period of the Recirculated DEIR, along with the responses to significant environmental points raised in them, are presented. The document is organized as follows:

- ▶ Chapter 1 (Introduction) provides a brief overview of the proposed project, describes the requirements under CEQA for responding to public comments received on the Recirculated DEIR, and describes the organization of the final environmental impact report (FEIR).
- ▶ Chapter 2 (List of Commenters) provides a list, in table format, of all written and oral comments received on the Recirculated DEIR.
- ▶ Chapter 3 (Response to Comments) provides responses to significant environmental issues raised in written and oral comments on the Recirculated DEIR, received during its public review period of October 17, 2005 to January 8, 2006.

The focus of the response to comments is on the disposition of significant environmental issues that have been raised in the comments, as specified by State CEQA Guidelines §15088(b), but also includes responses to pertinent planning considerations for implementation of the proposed General Plan.

No other changes to the General Plan, additional to those recommended in the Recirculated DEIR, are included in this document.

## Content of the Final Environmental Impact Report

Together, the Preliminary General Plan, original DEIR, Recirculated DEIR, and this response to comments document constitute the FEIR for the Bidwell-Sacramento River State Park General Plan.

## 2 LIST OF COMMENTERS

This chapter provides a list of all public comments received on the Recirculated DEIR during the public review period, which was October 18, 2005 to January 8, 2006. It focuses on written comments (i.e., letters) received on the Recirculated DEIR and provides a table indicating the commenter/agency that prepared written comments, the date the comment(s) were made, individual comment numbers, and the topic(s) raised in the comment (see Table 2-1). (Similar information is presented for comments received on the original DEIR in Chapter 2 of Recirculated DEIR.)

### LIST OF WRITTEN COMMENTS RECEIVED ON THE RECIRCULATED DEIR

Table 2-1 indicates the letter number, commenter, date of correspondence, comment number assigned, and the comment topic assigned for each written comment received on the Recirculated DEIR. The letters are numbered sequentially by date received and are noted with an "R" in the prefix to identify them as comments on the Recirculated DEIR. The letter numbers are then used as a prefix for individual comments, which are also number sequentially after the prefix. For example, comment R1-1 is the first comment of letter R1; comment R1-2 is the second comment of the same letter, etc.

Letter	Commenter/Agency	Date	Comment Number	Topic(s)
R1	Mike Mirmazaheri, Department of Water Resources	November 10, 2005	R1.1	Reclamation Board Authorities
R2	Scott A. Zaitz, Central Valley Region, California Regional Water Quality Control Board	January 6, 2006	R2.1	Need for Construction Stormwater Permit
R3	Dennis J. O'Bryant, Department of Conservation	November 17, 2005	R3.1	Definition of Conversion
			R3.2	Use of LESA Model
R4	Paul R. Minasian, Minasian, Spruance, Meith, Soares, & Sexton, LLP	December 2, 2005	R4.1	Consultation
			R4.2	Request for Information
			R4.3	Disruption of Flood Flows



### 3 RESPONSE TO COMMENTS

This chapter provides a complete copy of the written comments on the Recirculated DEIR for Bidwell-Sacramento River State Park, and presents responses to significant environmental issues raised in the comments, as required by State CEQA Guidelines §15132, as well as comments pertaining to the proposed General Plan. (Responses to comments on the original DEIR are contained in Chapter 3 of the Recirculated DEIR.)

Each letter is reproduced in its entirety, including attachments. Each letter and comments are labeled numerically, and correspond to Table 2-1. Written comments on the Recirculated DEIR are assigned an "R" in the prefix to distinguish them from written comments on the original DEIR. The responses to comments are also labeled numerically and follow each letter.

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
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NOV 10 2005

California State Parks  
One Capitol Mall, Suite 410  
Sacramento, California 95603

Bidwell-Sacramento River State Park Preliminary General Plan  
State Clearinghouse (SCH) Number: 2003022113

Staff for The Department of Water Resources has reviewed the subject document and provides the following comments:

Portions of the proposed project are located within a regulated stream over which The Reclamation Board has jurisdiction and exercises authority. If the project includes any "channel reconfiguration" that was not previously permitted, new plans must be submitted. Section 8710 of the California Water Code requires that a Board permit must be obtained prior to start of any work, including excavation and construction activities, within floodways, levees, and 10 feet landward of the landside levee toes. A list of streams regulated by the Board is contained in the California Code of Regulations, Title 23, Section 112.

Section 8(b)(2) of the Regulations states that applications for permits submitted to the Board must include a completed environmental questionnaire that accompanies the application and a copy of any environmental documents if they are prepared for the project. For any foreseeable significant environmental impacts, mitigation for such impacts shall be proposed. Applications are reviewed for compliance with the California Environmental Quality Act.

Section 8(b)(4) of the Regulations states that additional information, such as geotechnical exploration, soil testing, hydraulic or sediment transport studies, biological surveys, environmental surveys and other analyses may be required at any time prior to Board action on the application.

For further information, please contact Sam Brandon of my staff at (916) 574-0651.

Sincerely,

Mike Mirmazaheri, Chief  
Floodway Protection Section

R1-1

**Letter R1: Mike Mirmazaheri, California Department of Water Resources**

**November 10, 2005**

R1.1 The commenter states that a portion of the Park is under the jurisdiction of the Reclamation Board, and therefore, any future work including excavation and construction on lands subject to the Reclamation Board's authority would require a permit. This comment is similar to Comment 5 received on the original DEIR.

The Department acknowledges that the Reclamation Board has jurisdiction over portions of the Park, and a permit will be sought for all future work in these areas subject to permit requirements. Please refer to Chapter 4 of the Recirculated DEIR, Recommended Changes to the General Plan, for changes made to text on pages 3-12 and 3-30 (Goal AO-4.5-1) of the General Plan, which are revised to reflect the jurisdiction of the California Department of Water Resources/Reclamation Board.



**California Regional Water Quality Control Board**  
**Central Valley Region**



Alan C. Lloyd, Ph.D.  
*Agency Secretary*

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**Arnold Schwarzenegger**  
*Governor*

6 January 2006

Mr. Wayne Woodroof  
 California Department of Parks and Recreation  
 Northern Service Center  
 One Capital Mall, Suite 410  
 Sacramento, CA 95814

**REVIEW OF BIDWELL-SACRAMENTO RIVER STATE PARK PRELIMINARY GENERAL PLAN RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT, SCH# 2003022113, WEST OF CHICO, BUTTE COUNTY**

We have reviewed the Bidwell-Sacramento River State Park Preliminary General Plan Recirculated Draft Environmental Impact Report, submitted to our office on 13 December 2005. The Environmental Impact Report includes the construction of new recreation facilities, which include, but are not limited to, overnight campgrounds, day-use areas, trails, and a visitor center. Please consider the following comment.

Construction Stormwater Permit

Based on the project description, it appears that grading and/or other soil disturbing activities may occur. In order to protect water quality during construction, appropriate stormwater pollution control measures must be implemented. If construction activities result in a land disturbance of one or more acres, the project will need to be covered under the General Construction Stormwater Permit (Order No. 99-08-DWQ). The permit requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared prior to construction activities. The SWPPP is used to identify potential pollutants (such as sediment and earthen materials, chemicals, building materials, etc.) and to describe best management practices that will be utilized to eliminate or reduce those pollutants from entering surface waters. The Construction Stormwater Permit can be obtained from the Regional Water Quality Control Board (Regional Board) office or website: [www.waterboards.ca.gov/stormwtr/construction.html](http://www.waterboards.ca.gov/stormwtr/construction.html).

R2-1

If you have any questions, please contact me at (530) 224-4784 or at the letterhead address above.

*Scott A. Zaitz*

Scott A. Zaitz, R.E.H.S.  
 Environmental Scientist

SAZ: kg

Letter R2: Scott A. Zaitz, California Regional Water Quality Control Board, Central Valley Region

January 6, 2006

R2.1 The commenter states that some activities that may occur in the Park in the future as the General Plan is implemented could require a Construction Stormwater Permit. If a permit were required the Department would need to prepare a Storm Water Pollution Prevention Plan (SWPPP). The Department acknowledges that a permit will be sought for future construction projects, in accordance with the Regional Water Quality Control Board's requirements.

**DEPARTMENT OF CONSERVATION****DIVISION OF LAND RESOURCE PROTECTION**

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November 17, 2005

Mr. Wayne Woodroof  
California Department of Parks and Recreation  
One Capital Mall, Suite 410  
Sacramento, CA 95814

Subject: SCH# 20030221133 – Recirculated Draft Environmental Impact Report  
for the Preliminary General Plan (Agricultural Resources) for the  
Bidwell-Sacramento River State Park

Dear Mr. Woodroof:

The Department of Conservation (DOC) staff have reviewed the recirculated Draft Environmental Impact Report for the Preliminary General Plan (Agricultural Resources). The proposed project consists of a new General Plan for the Bidwell-Sacramento River State Park. The General Plan is intended to serve as a management tool for the State Park for the next twenty years. The Plan includes a set of park-wide goals and guidelines, and provides area-specific management and facility prescriptions for subunits and potential property additions considered in the planning process. Three acquisitions are involved: the Singh, Brayton, and Beard properties, comprising of approximately 145 acres of farmland being converted.

We respectfully offer the following comments:

The riparian forest was removed and converted to agricultural production before the California Environmental Quality Act was enacted. The proposed implementation of the General Plan would restore the riparian forest and natural ecological communities in the project area. As such, portions of the Existing Environment are comprised of agricultural lands.

The Department of Parks and Recreation provides a discussion pertaining to conversion of agricultural lands. Apparently, the Department of Parks and Recreation considers "conversion" for the purposes of assuming potential impacts under the Appendix G checklist and Land Evaluation and Site Assessment (LESA) Model to involve the commitment of productive farmed land to irreversible development or non-agricultural uses that damage or eliminate the soil and open space values of the land or create

R3-1

Mr. Wayne Woodroof  
November 17, 2005  
Page 2

secondary growth-inducing impacts to adjacent farmed lands by precluding nearby agricultural uses. Also, the Department of Parks and Recreation indicates that the impact to agricultural uses is found to be less than significant, a shift from the analysis in the DEIR circulated in 2003. The original finding was that the removal of orchards for the purpose of restoration of riparian forest was found to be a significant unavoidable impact to agricultural resources. Damage or elimination of the soil and open values of the land or the potential for growth-inducing impacts may be somewhat narrow in how "conversion" is defined. As the project involves mechanical removal of orchards and construction of a visitor headquarters and ancillary facilities, such activities will require the use of earth moving equipment. If there is a campground proposed in the future, such use may be far more intense than "light recreation", such as hiking. Removal of the agricultural crops currently grown in the project area and precluding the continuance of agricultural practices so that the land can support a different use constitutes a change in the physical environment, and we consider this to be "conversion".

R3-1  
Cont'd

The DOC's LESA model (and the instruction manual) is available on DOC's website. The model provides an objective and consistent method for determining level of significance of impacts to agricultural resources. It applies to projects that have the potential to convert of agricultural resources to other uses. It is not DOC's intent to obstruct the progress or implementation of the General Plan; however, we respectfully request that the Department of Parks and Recreation utilize the LESA model so that an objective basis can be made. Such use would alleviate the necessity to provide argument and rationale of why there would be no significant impact. It appears that the model was not used. Please do not hesitate to contact DOC staff as we are more than willing to provide technical assistance in the LESA computation and analysis for this project. Please note that Butte County now has a published soil survey, which can be downloaded via computer at <http://soildatamart.nrcs.usda.gov/> Butte County is CA 612.

R3-2

Thank you for the opportunity to review this document. Please do not hesitate to contact Jeannie Blakeslee at (916) 323-4943 if you have any questions regarding these comments or require assistance in computing the LESA analysis.

Sincerely,



Dennis J. O'Bryant  
Acting Assistant Director

**Letter R3: Dennis J. O'Bryant, California Department of Conservation**

**November 17, 2005**

R3.1 The commenter indicates that the Department's definition of "conversion" to non-agricultural uses "may be somewhat narrow." The commenter considers activities contemplated in the General Plan, such as removal of crops and construction of a visitor headquarters or a campground, to be conversion.

A statutory definition of "conversion" as it relates to agricultural resources does not exist in the California Environmental Quality Act (CEQA) or other sections of the Public Resources Code; nor does a regulatory definition exist in the California Code of Regulations. Consequently, to determine whether the activities contemplated by the General Plan would constitute conversion to nonagricultural use, the Department conducted extensive review of other relevant references, including the Instruction Manual for the Land Evaluation and Site Assessment (LESA) model. This review is reported on pages 4-13 to 4-16 of the Recirculated DEIR. The other references supported the definition used in the EIR, as described on those pages. This included the LESA definition of "land committed to nonagricultural use" as "land that is permanently committed by local elected officials to nonagricultural development," including the urban development-related actions of a tentative subdivision map, final parcel map, or development agreement. Each of these descriptors relates to urban development actions that are not relevant to the planned uses in Bidwell-Sacramento River State Park.

As an additional point of clarification, the visitor center identified in the General Plan is located in the Sunset Ranch Addition. The visitor center site is located on land not designated as "irrigated Farmland" in Butte County. Rather, the site is between an existing access road and the Sacramento River, in an area designated as "other land" by the county. Therefore, the visitor center would not involve removal of crops from an irrigated farmland area.

R3.2 The commenter requests that the Department use the optional LESA model for evaluating effects on agricultural resources. The Department appreciates the request and considered use of the LESA model in the EIR. For the rationale summarized in the Recirculated DEIR, the Department decided the LESA model would not be sufficiently applicable to this specific project, and opted not to include it in the EIR.

**MINASIAN, SPRUANCE,  
MEITH, SOARES &  
SEXTON, LLP**

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A Partnership Including Professional Corporations

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OROVILLE, CALIFORNIA 95965-1679

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PAUL R. MINASIAN, INC.  
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(530) 533-0197



December 2, 2005

California Department of Parks & Recreation  
Acquisition and Development Division  
Attn: Matt Teague, Project Manager  
400 Glen Drive  
Oroville, California 95966-9222

California Department of Parks & Recreation  
Acquisition & Planning Division  
Northern Service Center  
One Capitol Mall, Ste 500  
Sacramento, California 95814

Re: Draft Initial Study/Mitigated Negative Declaration  
Big Chico Creek Access to Sacramento River, Draft IS/MND  
Bidwell-Sacramento River State Park

Ladies & Gentlemen:

The Sacramento River Reclamation District is a California Reclamation District which includes the area you are describing in the above-entitled Project within its boundaries. The SRRD is a Responsible Public Agency as defined in California Environmental Quality Act.

The Sacramento River Reclamation District previously sent comments to your General Plan - Draft EIR, State Clearinghouse Project 200-3022113. We pointed out in those comments that you had not performed the consultation required with responsible public agencies before preparing a draft environmental document, be it an Environmental Impact Report or an Initial Statement and Negative Declaration. We also pointed out that

R4-1

To: California Department of Parks & Recreation  
Re: Draft Initial Study/Mitigated Negative Declaration  
Big Chico Creek Access to Sacramento River, Draft IS/MND  
Bidwell-Sacramento River State Park  
Date: December 2, 2005

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there are potentially significant impacts arising from flood flows and diversion of flood flows because of the removal of orchards and the attempt to revegetate those areas with dense vegetation.

The current project involves substantial elevation change and the construction of improvements. This area is part of an area subject to flooding. It is essential to maintaining open space uses, such as agricultural productive uses, that improvements not be installed and vegetation not be allowed to grow in such a fashion that flood water will be diverted, cause erosion, or cause saturation of the soil and delayed drainage after flood events. Our District is involved in assuring that land changes conform to the plan and experience of the District and its landowners and minimize flood effects.

We are indeed disappointed that you did not consult with us prior to commencement of drafting of this document as is required under CEQA. It may well be that after examination, we will conclude that no flood impacts or flow changes will occur under your Plan. However, we do not know that at this point and cannot determine it from your Environmental Impact Statement.

R4-1  
Cont'd

An Environmental Impact Statement and Mitigated Negative Declaration that does not comply with the Responsible Public Agency consultation requirement contained within Title 14, Division 6, Chapter 3 of the California Administrative Code is unlawful. We suggest that you immediately provide us with the following information:

1. A topographical map showing the current contours of the area to be developed in much more detail than the USGS map contained within your Draft IS/MND.
2. Please show us a site map in which we can see exactly what elevation changes are anticipated to occur and what density of vegetation will exist. This area is subject to a rule that if a grading change of more than two feet (2') is proposed, it is subject to a review process.
3. Currently the area consists of largely open space with periodic tree banding. There is no information in regard to the effect on rising and declining flood conditions in the changes you propose. This is essential to include within your description of environmental impacts or the potential of environmental impacts. It is especially

R4-2

To: California Department of Parks & Recreation  
Re: Draft Initial Study/Mitigated Negative Declaration  
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important that a flow pattern during declining flood levels in the Sacramento River through grassland areas be maintained so that upslope agricultural lands will quickly drain, allowing the trees and root structure to desaturate. We cannot tell what clearing and maintenance of the vegetation you propose to maintain those flowage patterns from north to south, and from north and east to the west. Particularly, we can see two flow areas on the aerial photographs extending from north to south which appear to have been cleared and maintained to provide flow areas in winter and spring flow conditions where flood or inundation flows can be dewatered from the orchards to the west and north. It is essential that those be maintained in an open condition.

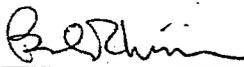
R4-2  
Cont'd

We must say that we are disturbed by the idea that you may be moving forward with an initial study and mitigated negative declaration without completing your description of environmental impacts in conformance with the flood plane regulations and the General Plan that will assure that flood flow patterns within this area will be maintained and that agricultural uses of adjoining and upslope lands will also be maintained because flood flows will not be disrupted. The device that "it's just a boat ramp and some parking spaces" will not work. We expect you to stop the processing until the Responsible Agency Consultation can fully occur, and of course we hope that your plan will turn out not to have any significant impacts. However, because governmental entities are required to comply with these Rules, a hurry to spend public monies is not an excuse.

R4-3

Very truly yours,

MINASIAN, SPRUANCE,  
MEITH, SOARES & SEXTON, LLP

By:   
\_\_\_\_\_  
PAUL R. MINASIAN

PRM:df

cc: Board of Trustees, Sacramento River Reclamation District  
S:\Denise\Sacrec\CA Dept of Parks & Rec.1.wpd

December 2, 2005

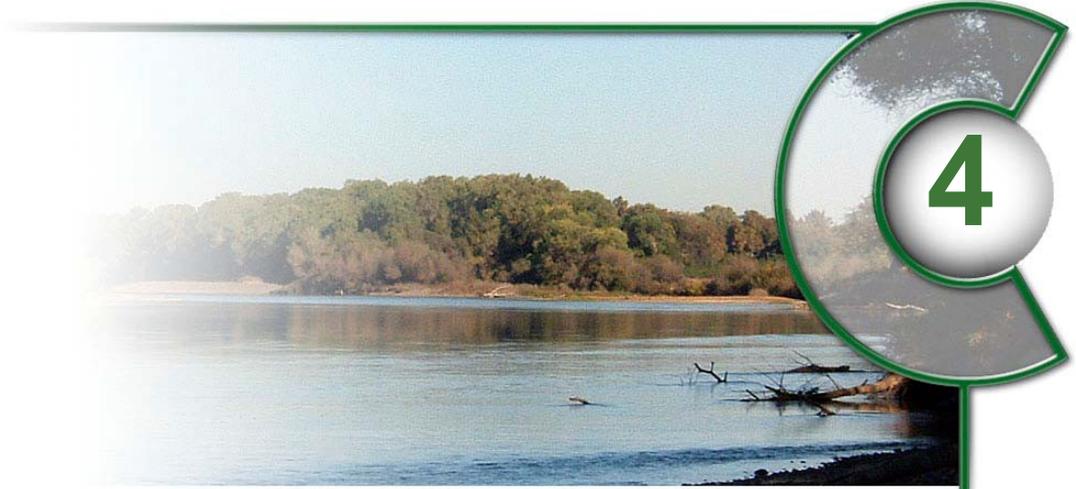
R4.1 The commenter expresses concern that the Department did not consult with his client, the Sacramento River Reclamation District, during the preparation of the environmental documents for the General Plan. The Department has implemented applicable CEQA procedures related to consultation with responsible agencies. As required by Section 15082 of the State CEQA Guidelines, the Department distributed a Notice of Preparation on February 21, 2003. In compliance with Sections 15086 and 15087 of the guidelines, when the Preliminary General Plan and DEIR were released for public review, the Department published a Notice of Availability inviting comment and consultation, dated December 12, 2003. When the Recirculated DEIR was in public review, the Department published notices inviting comment and consultation, dated October 17 and December 16, 2005. These notices are all still available on the Department's website at [http://www.parks.ca.gov/?page\\_id=22600](http://www.parks.ca.gov/?page_id=22600). Multiple opportunities for comment and consultation have been provided through the course of the EIR process.

The commenter also expresses concern that the project involves substantial elevation changes and construction improvements in areas subject to flooding. Approval of the General Plan does not, by itself, authorize specific construction projects, so it is not clear what construction is of concern to the commenter. Additionally, the General Plan includes a goal and guideline to avoid significant adverse flooding effects. Goal AO-3.1 directs that Park facilities be sited and designed to embrace natural river processes. Guideline AO-3.1-1 requires siting and facility design features to minimize flood effects. Facility developments constructed consistent with the General Plan would not result in significant flooding effects.

R4.2 The commenter highlights the importance of maintaining open areas for flood flows. The General Plan goals and guidelines include direction intended to allow for the natural river functions to continue. Goal ER-3.1 directs that the natural river dynamics be allowed to continue. Guideline ER-3.1-1 involves monitoring of the river course, which would include areas of river flows and Guideline ER-3.1-2 indicates that new facilities and bank stabilization will be located to minimize effects to the river course, which would help avoid locating projects where they may adversely affect river flows. Consequently, the General Plan anticipates the importance of areas carrying flood flows and implementation of it would help avoid adverse effects to the river.

R4.3 The commenter indicates concern about the Department moving ahead with an initial study and mitigated negative declaration, apparently related to a referenced boat ramp project. As a point of clarification, the current General Plan and EIR does not, by itself, authorize construction of facilities, while it does designate planned locations and defines the process for further review and implementation of facility improvements. Therefore, the decision at hand (i.e., approval of the General Plan) is different than what the commenter appears to be describing.





**CEQA Notices**





**State of California – The Resources Agency  
DEPARTMENT OF PARKS AND RECREATION**

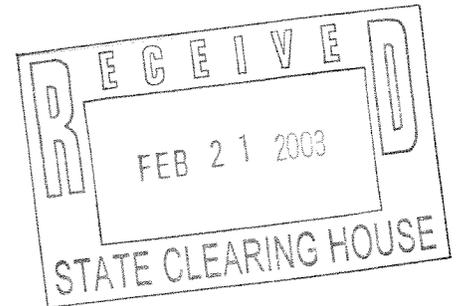
## Notice of Preparation

**To:** State Clearinghouse, Responsible and Trustee Agencies, Interested Individuals

**Subject:** Notice of Preparation of a programmatic Environmental Impact Report for the Bidwell-Sacramento River State Park General Plan

**Lead Agency:** California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814  
Contact: Wayne Woodroof

**Consultant:** EDAW, Inc.  
2022 J Street  
Sacramento, CA 95814  
Contact: Curtis Alling, Steve Pavich



The California Department of Parks and Recreation (DPR), as the Lead Agency, will prepare a programmatic Environmental Impact Report (EIR) for the Bidwell-Sacramento River State Park General Plan. We would like to know the views of interested persons, organizations, and agencies as to the scope and content of the information to be included and analyzed in the EIR. Agencies should comment on the elements of the environmental information that are relevant to their statutory responsibilities in connection with the proposed project.

The project description, location, and possible environmental effects (to the extent known) are contained in this Notice of Preparation (NOP).

Due to the time limits mandated by State law, your response should be sent at the earliest possible date, but not later than **30 days** after issuance of this notice, which establishes the final deadline as **March 24, 2003**.

Please send your written response to Wayne Woodroof, Statewide General Plan Coordinator, California Department of Parks and Recreation, at the address shown below. Responses should include the name of a contact person at your agency.

**DEPARTMENT OF PARKS AND RECREATION CONTACT PERSON**

Mr. Wayne Woodroof  
Manager, Statewide General Plan Program  
California Department of Parks and Recreation  
Northern Service Center  
One Capitol Mall, Suite 500  
Sacramento, CA 95814  
(916) 445-8850

A planning workshop and EIR scoping meeting has been scheduled to give the public an opportunity to comment on the scope, focus, and content of the Bidwell-Sacramento River State Park General Plan and EIR. The meeting will be held from 6:00 PM to 8:00 PM on March 18, 2003 at Bidwell Mansion SHP Visitor Center located at 525 The Esplanade, Chico CA 95926.

**PROJECT TITLE**

Bidwell-Sacramento River State Park General Plan

**PROJECT LOCATION**

Bidwell-Sacramento River State Park (Park) is located approximately six miles west of the City of Chico, in Butte and Glenn counties (Exhibit I). The Park consists of four discontinuous properties that are located primarily along the banks of the Sacramento River just west of the City of Chico in Northern California. At the northern end of the unit, Irvine Finch River Access is situated on the west side of the river in Glenn County; the other segments consist of Pine Creek Landing, Indian Fishery/Chico Landing, and the Big Chico Creek Riparian Area/Peterson Addition on the east side of the river in Butte County.

**PROJECT DESCRIPTION**

DPR's General Plan Unit, in conjunction with its Northern Buttes District office, is in the process of developing a General Plan for the Park in accordance with Public Resources Code §5002.2 referencing General Plan guidelines and §21000 et seq. concerning the California Environmental Quality Act (CEQA). The purpose of the General Plan is to guide future development activities and management objectives at the Park. Preparation of the General Plan is in its early stages, so ultimate land use and resources management provisions have not yet been determined. DPR is currently in the process of evaluating existing resources and management opportunities and constraints at the Park that will aid in the development of the General Plan.

The Park is characterized by valley oak riparian woodland and other riparian communities, and possesses substantial recreational resources and opportunities ranging from nature trails, fishing, and picnicking to boating and tubing. Known resources at the Park include:

- Sacramento River and tributaries;
- Native riparian habitat (e.g., valley oak woodland);
- Special-status species (e.g., giant garter snake, anadromous fish species, Swainson's hawk, Valley Elderberry Longhorn Beetle);

- Oxbow lake at Indian Fishery;
- Significant historic and prehistoric areas (e.g., Chico Landing, bridge sites, Sea Scout station, Bidwell ferry site, occupation sites);
- High-use recreational areas (e.g., Irvine Finch River Access, Pine Creek Landing, Big Chico Creek gravel bar); and
- Existing and potential acquisition areas.

Issues that will be considered as part of the General Plan process include, but are not limited to, the following:

- Protection and long-term management of sensitive natural and cultural resource areas;
- Property acquisition to form contiguous management tracts;
- Increased recreational access, including improved water and undeveloped area access (e.g., trail development, parking areas);
- Expansion of recreational facilities (e.g., environmental education camps and primitive campground areas);
- Management of river tubing activities during peak recreational periods, including public safety issues;
- Development of interpretive facilities, such as a visitor center, interpretive panels highlighting natural and cultural resources, etc.;
- Facility siting and design to avoid flooding events (e.g., relocation); and
- Improved inter-agency coordination.

## **POSSIBLE ENVIRONMENTAL EFFECTS**

Although ultimate land use and resources management provisions of the General Plan have not yet been determined, generally expected types of environmental impacts that may occur as a result of the General Plan can be identified. Based on the resource characteristics of the Park and generally anticipated Park uses, potential environmental effects that will likely be addressed in the EIR, include:

- Potential conflicts between sensitive wildlife species/natural communities (e.g., giant garter snake, valley oak woodland) and facility development;
- Facility development in flood-prone areas;
- Conversion of farmland to non-agricultural uses resulting from facility development and/or conservation objectives;
- Potential for substantial adverse change in the significance of historic and prehistoric resources in the Park;

- Erosion/water quality impacts along the Sacramento River and its tributaries;
- Substantial alteration of the existing drainage pattern of the project area.

Recreational use levels at the Park are expected to change as a result of the General Plan. However, no significant transportation improvements and/or impacts are anticipated. If the potential to take threatened and endangered species is identified, the EIR will describe future State and Federal consultation and permit requirements that will be necessary for facility development and the types of mitigation typically expected.

#### **INTENDED USES OF THE EIR**

DPR and the Parks and Recreation Commission will use the EIR component of the General Plan to consider the environmental effects, mitigation measures, and alternatives, when reviewing the proposed General Plan for approval. The EIR will serve as the State's CEQA compliance document for adoption of the General Plan. It will also serve as the programmatic environmental document that may be referenced in implementing future actions included in the General Plan. Subsequent project-level activities identified in the General Plan will be examined in light of the program EIR to determine whether an additional environmental document must be prepared prior to project approval and implementation (State CEQA Guidelines 15168(c)). Responsible agencies may also use the EIR as needed for subsequent discretionary actions.

**By:** Wayne O. Woodroof

**Signature:** Wayne O. Woodroof

**Title:** Manager, Statewide General Plan Program

**Date:** February 21, 2003

**Attachment:** Regional Vicinity Map





Notice of Completion & Environmental Document Transmittal

SCH # 2003022113

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

Project Title: Bidwell-Sacramento River State Park Preliminary General Plan and Draft EIR

Lead Agency: California Department of Parks and Recreation

Contact Person: Mr. Wayne Woodroof

Street Address: One Capital Mall, Suite 500

Phone: 916/445-8850

City: Sacramento

Zip: 95814

County: Sacramento

Project Location:

County: Butte/Glenn

City/Nearest Community: Hamilton City/Chico

Cross Streets: State Route 32 and River Road

Zip Code: 95951/95926 Total Acres: 210

Assessor's Parcel No. N/A

Section:

Twp.:

Range:

Base:

Within 2 Miles: State Hwy #: SR 32

Waterways: Sacramento River, Big Chico Creek, Mud Creek, & Kusal Slough

Airports: None

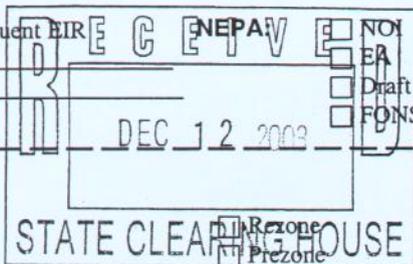
Railways: None

Schools: None

Document Type:

- CEQA: [ ] NOP [ ] Early Cons [ ] Neg Dec [x] Draft EIR

- [ ] Supplement/Subsequent EIR (Prior SCH No.) [ ] Other



- Other: [ ] Joint Document [ ] Final Document [ ] Other

Local Action Type:

- [x] General Plan Update [ ] General Plan Amendment [ ] General Plan Element [ ] Community Plan

- [ ] Specific Plan [ ] Master Plan [ ] Planned Unit Development [ ] Site Plan

- [ ] Use Permit [ ] Land Division (Subdivision, etc.)

- [ ] Annexation [ ] Redevelopment [ ] Coastal Permit [ ] Other

Development Type:

- [ ] Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_ [ ] Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_ [ ] Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_ [ ] Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_ [ ] Educational \_\_\_\_\_ [ ] Recreational \_\_\_\_\_

- [ ] Water Facilities: Type \_\_\_\_\_ MGD [ ] Transportation: Type \_\_\_\_\_ [ ] Mining: Mineral \_\_\_\_\_ [ ] Power: Type \_\_\_\_\_ Watts \_\_\_\_\_ [ ] Waste Treatment: Type \_\_\_\_\_ [ ] Hazardous Waste: Type \_\_\_\_\_ [x] Other: GP Update for Bidwell-Sacramento River SP

Funding (approx.): Federal \$ \_\_\_\_\_ State \$ \_\_\_\_\_ Total \$ \_\_\_\_\_

Project Issues Discussed in Document:

- [x] Aesthetic/Visual [x] Flood Plain/Flooding [ ] Schools/Universities [x] Water Quality [x] Agricultural Land [x] Forest Land/Fire Hazard [x] Septic Systems [x] Water Supply/Groundwater [x] Air Quality [x] Geologic/Seismic [ ] Sewer Capacity [x] Wetland/Riparian [x] Archeological/Historical [ ] Minerals [x] Soil Erosion/Compaction/Grading [x] Wildlife [ ] Coastal Zone [x] Noise [x] Solid Waste [x] Growth Inducing [x] Drainage/Absorption [ ] Population/Housing Balance [x] Toxic/Hazardous [x] Landuse [ ] Economic/Jobs [x] Public Services/Facilities [x] Traffic/Circulation [x] Cumulative Effects [ ] Fiscal [x] Recreation/Parks [x] Vegetation [ ] Other

Present Land Use/Zoning/General Plan Designation:

None

Project Description:

The proposed project consists of the development of a new General Plan for Bidwell-Sacramento River State Park. The General Plan will guide future management direction at the Park over an approximate 20-year planning horizon. The General Plan contains a comprehensive and integrated set of park-wide goals and guidelines for the long-term management of the Park that focuses on protection of environmental resources, enhancements to visitor use and opportunities, and improvements to administration and operations of the Park. In addition, the General Plan provides a spatial dimension to Park planning through the use of area concept planning, which includes area-specific management and facility prescriptions for the subunits and potential property additions that have been considered in the planning process. A range of new recreation facilities are proposed at the Park, which include, but are not limited to, overnight campgrounds, day-use areas, trails, and a visitor center.

# Reviewing Agencies Checklist

Form A, continued

### KEY

- S** = Document sent by lead agency
- X** = Document sent by SCH
- ✓ = Suggested distribution

#### Resources Agency

- Boating & Waterways
- Coastal Commission
- Coastal Conservancy
- Colorado River Board
- Conservation
- Fish & Game
- Forestry & Fire Protection
- Office of Historic Preservation
- Parks & Recreation
- Reclamation Board
- S.F. Bay Conservation & Development Commission
- Water Resources (DWR)

#### Business, Transportation & Housing

- Aeronautics
- California Highway Patrol
- CALTRANS District # 3
- Department of Transportation Planning (headquarters)
- Housing & Community Development

#### Food & Agriculture

#### Health & Welfare

- Health Services \_\_\_\_\_

#### State & Consumer Services

- General Services
- OLA (Schools)

#### Environmental Protection Agency

- Air Resources Board
- California Waste Management Board
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit
- SWRCB: Water Quality
- SWRCB: Water Rights
- Regional WQCB # 5 ( Central Valley )

#### Youth & Adult Corrections

- Corrections

#### Independent Commissions & Offices

- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency

- Other \_\_\_\_\_

#### Public Review Period (to be filled in by lead agency)

Starting Date December 12, 2003

Ending Date January 26, 2004

Signature Wayne Woodroof <sup>SR</sup>

Date 12/12/03

#### Lead Agency (Complete if applicable):

Consulting Firm: EDAW  
 Address: 2022 J Street  
 City/State/Zip: Sacramento, CA 95814  
 Contact: Steve Pavich  
 Phone: ( 916 ) 414-5800

#### For SCH Use Only:

Date Received at SCH \_\_\_\_\_  
 Date Review Starts \_\_\_\_\_  
 Date to Agencies \_\_\_\_\_  
 Date to SCH \_\_\_\_\_  
 Clearance Date \_\_\_\_\_

Notes:

#### Applicant: California Department of Parks and Recreation

Address: One Capitol Mall, Suite 500  
 City/State/Zip: Sacramento, CA 95814  
 Phone: ( 916 ) 445-8850



### NOTICE OF DETERMINATION

**TO:** State Clearinghouse  
Office of Planning and Research  
1400 Tenth Street, Room 222  
P.O. Box 3044  
Sacramento, California 95812-3044

**FROM:** Department of Parks and Recreation  
1416 Ninth Street  
P.O. Box 942896  
Sacramento, California 94296-0001

**SUBJECT:** Filing of the Notice of Determination in compliance with Section 21108 of the Public Resources Code.

**STATE CLEARINGHOUSE NUMBER:** 2003022113

**PROJECT TITLE:** Bidwell-Sacramento River State Park General Plan

**CONTACT PERSON:** Wayne Woodroof  
1416 9<sup>th</sup> Street Room 923  
Sacramento, CA 95814

**PHONE NO.:** (916) 651-0305

**PROJECT LOCATION:** Bidwell-Sacramento River State Park

**PROJECT DESCRIPTION:** General Plan for the operation, development, management, and interpretation of Bidwell-Sacramento River State Park.

**This is to advise that the California Department of Parks and Recreation has approved the above project on March 3, 2006, and has made the following determinations regarding the above described project:**

- 1.  The project will not have a significant effect on the environment.  
 The project will have a significant effect on the environment.
- 2.  An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.  
 A Negative Declaration was prepared for this project, pursuant to the provisions of CEQA.
- 3. Mitigation measures  were  were not made a condition of the approval of the project.
- 4. A Mitigation reporting or monitoring plan was  was not adopted for this project.
- 5. A Statement of Overriding Considerations  was  was not adopted for this project.
- 6. Findings  were  were not made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the Negative Declaration, is available to the General Public at the California Department of Parks and Recreation, Northern Service Center, located at One Capital Mall, Suite 410, Sacramento, California, 95814..



Steve Lehman  
Deputy Director  
Acquisition and Development Division

March 10, 2006  
Date