

# Butte Environmental Council



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[www.becnet.org](http://www.becnet.org)

## Activities and Events

Environmental Advocacy  
Environmental Education  
Groundwater Protection  
Endangered Species Faire  
Bidwell Park Cleanups  
Chico Area Creek Cleanups  
Community Gardens  
Chico Bicycle Music Festival

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Education & Outreach  
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Marketing and Grants

July 20, 2016

Bob Summerville, AICP, Senior Planner  
City of Chico Community Development Department  
411 Main Street, 2nd Floor  
Post Office Box 3420  
Chico, CA 95928  
[bob.summerville@chicoca.gov](mailto:bob.summerville@chicoca.gov)

Dear Mr. Summerville

Butte Environmental Council is submitting the following comments on the Notice of Preparation of an Environmental Impact Report for the Stonegate Vesting Tentative Subdivision Map and General Plan Amendment / Rezone. Butte Environmental Council opposes the subdivision, rezoning and development of this 313 acre project site. **This site should be set aside for permanent conservation of critical vernal pool wetlands and surrounding grassland habitat for the species that depend on it.**

Butte County meadowfoam (*Limnanthes floccosa ssp. californica*) is a California endangered plant species, [California Endangered Species Act \(CESA\)](#) and is listed as endangered under the federal [Endangered Species Act \(ESA\)](#). Butte County meadowfoam is only found in Butte County along a narrow 25-mile strip from central Butte County to its northern border. Within this area there are 7 geographically separate and genetically distinct populations of Butte County meadowfoam.

Long-term collaboration between USFWS, CDFW and Lassen Chapter of CNPS resulted in plan to recover the endangered Butte County meadowfoam species. For the genetically unique Chico population, species survival and recovery depend on the Chico Butte County Meadowfoam Preserve as described in the Butte Regional Conservation Plan Formal Public Draft.

The Stonegate project removes 313 acres of the 2,712 acres of proposed Preserve. It also threatens the adjacent 35 acre Doe Mill Meadowfoam Preserve, surrounding and isolating the small protected population where more than 8,000 individuals have been recorded on 15 acres of occupied area. According to the USFWS Vernal Pools Recovery Plan (2005) the small size of the meadowfoam Preserves threatens long term viability of the species. The plan references the genetically distinct "Chico Core" Population, specifically citing the Doe Mill Preserve as being vulnerable to low population densities and restricted distribution. The Recovery Plan identified permanent conservation in large contiguous blocks of suitable habitat as a requirement for recovery of Butte County meadowfoam. Development of this site will further isolate the existing population in the Doe Mill and Butte County Meadowfoam Preserves rather than strengthen existing protections and provide an opportunity for species recovery.

According to the USFWS 2005 Recovery Plan, Butte County meadowfoam habitat includes grasslands with suitable soil types. A portion of the approximately 1,656 Butte County meadowfoam individuals observed on the project site were in annual grasslands, despite being classified as "non-sensitive", this community type can provide habitat for special status species. The species that live in vernal pools provide food chain support for migratory waterfowl and other native animals that depend on the grassland habitat and

numerous listed bird species rely on the grasslands surrounding the vernal wetlands for foraging.

Vernal wetlands and their supportive surrounding grasslands perform many valuable functions for humans as well as wildlife. They assist in storm water detention, minimizing flooding. The open grasslands also provide passive recreation opportunities (e.g., hiking, photography, bird watching, wildflower viewing). Furthermore, the wetlands filter pollutants from storm water runoff, enhancing local water quality.

The USFWS 5-year review of Butte County meadowfoam (2008) stated:

*“Habitat loss or degradation from urbanization continues to be the greatest threat to all occurrences of the subspecies, even to those that are protected from development. Habitat degradation results from changes in the amount of surface and subsurface water hydrology, introduction of invasive plants, and in areas adjacent to agricultural or residential uses, introduction of pesticides and herbicides.”*

The 2005 Vernal Pools Recovery Plan determined that to recover Butte County meadowfoam we must protect 100 percent of all occurrences and 95 percent of suitable habitat range-wide. **This site is needed for permanent conservation, not for further development and degradation of our watershed and natural habitats.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Natalie Carter', with a large, stylized initial 'N'.

Natalie Carter, Executive Director  
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