



December 16, 2024

Alpine County Board of Supervisors  
99 Water Street.  
Markleeville, CA 96120

Transmitted via electronic mail:  
sbooth@alpinecountyca.gov

## **Transmittal Letter: Alpine County Wildfire Risk Mitigation Plan & Final Initial Study/Mitigated Negative Declaration (IS/MND) Amendment**

Dear Board:

Nevada Environmental Consulting, LLC. (NVENV), on behalf of Alpine County and Alpine Fire Safe Council, is requesting your review of the addendum to the Wildfire Risk Mitigation Plan. Pursuant to the provisions of the California Environmental Quality Act (CEQA), Public Resources Code Sections 21000 et. seq. and the State CEQA Guidelines, implementation of the addendum does not impact the existing study conditions or require a subsequent Environmental Impact Report (EIR). Registered Professional Forester, Jason Moghaddas, an original author of the Alpine County approved IS/MND, submitted a letter of concurrence in support of increasing the prescription size class of vegetation be increased to 12-inches dbh, due to the growth of vegetation since the approved date (February 2021) of the IS/MND. NVENV agrees that this amended prescription meets California Forest Practice Rules, and the submitted addendum and forester concurrence satisfies CEQA.

This amendment under review is separate from the previously submitted amendment, received in the SCH on September 11, 2024, which outlines an increase in acreage around the Markleevillage, Diamond Valley 1 & 2, and Manzanita areas of 100.9-acres to support continued fuels management and defensible space projects.

The proposed modification to the IS/MND implementation plan will increase the defined tree diameter (dbh) from 10-inches to 12-inches. This increase is necessary to accomplish county fuels reduction and wildfire safety and resiliency projects. The modification does not result in any significant environmental impacts to the defined IS/MND project areas. As you will see in Table 1 of the amendment, increasing the dbh limit will have less impact than currently approved IS/MND in geology and soils, hazards and hazardous materials, and wildfire.

Thank you for your review and support to submit this amendment to the State of California CEQA Clearing House.

Sincerely,

Stephanie "Sam" Cajandig  
Environmental Analyst

Attachments (2):

- 1) Addendum to IS/MND



## MEMORANDUM

DATE: October 1, 2024

TO: Sam Booth, Associate Planner  
Alpine County Community Development Department

FROM: Alpine Fire Safe Council, Alpine County Wildfire Coordinator

SUBJECT: Implementation Plan Addendum to Alpine County Wildfire Risk Mitigation Plan Final Initial Study/Mitigated Negative Declaration

### Introduction and Purpose

This document is an Addendum to the Initial Study/Mitigated Negative Declaration (IS/MND) for the lands of Alpine County that include five key community areas, including Woodfords, Hung-a-Lel-Ti, Markleeville, Kirkwood, and Bear Valley projects approved in February 2021 (herein referred to as the “Approved Projects”). This Addendum serves as the environmental review for a proposed modification to the implementation plan to increase the defined diameter of green and dead trees in the IS/MND. This Addendum has been prepared pursuant to the provisions of the California Environmental Quality Act (CEQA), Public Resources Code Sections 21000 et. seq. and the State CEQA Guidelines.

This Addendum documents that none of the conditions described in CEQA Section 21166 or CEQA Guidelines Sections 15162 or 15164 calling for preparation of a subsequent or supplemental EIR have occurred. Pursuant to the provisions of CEQA and the State CEQA Guidelines, Alpine County is the lead agency charged with the responsibility of deciding whether or not to approve the proposed action. This Addendum analyzes the proposed minor changes to the Approved Project.

### Standard for Preparation of an Addendum

Pursuant to Section 21166, *Subsequent or Supplement Impact Report; Conditions*, of CEQA and Section 15162, *Subsequent EIRs and Negative Declarations*, of the State CEQA Guidelines, when an Environmental Impact Report (EIR) has been certified for a project, no subsequent EIR or negative declaration shall be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

- Substantial project changes are proposed that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified and adopted shows any of the following:
  - The project will have one or more significant effects not discussed in the previous EIR.



- Significant effects previously examined will be substantially more severe than identified in the previous EIR.
- Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives.
- Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

Where none of the conditions specified in Section 15162 are present,<sup>1</sup> the lead agency must determine whether to prepare an Addendum or whether no further CEQA documentation is required (CEQA Guidelines Section 15162[b]). An Addendum is appropriate where some minor technical changes or additions to the previously certified EIR or IS/MND are necessary, but there are no new or substantially more severe significant impacts (CEQA Guidelines Section 15164, *Addendum to an EIR or Negative Declaration*).

In accordance with the CEQA Guidelines, the County has determined that an Addendum to the approved IS/MND is the appropriate environmental document for the Modified Project. This Addendum reviews the changes proposed by the Modified Project and examines whether, as a result of any changes or new information, a subsequent MND may be required. This examination includes an analysis pursuant to the provisions of Section 21166 of CEQA and Section 15162 of the State CEQA Guidelines concerning their applicability to the Modified Project.

## Project Description

### LOCATION AND SETTING

Relevant vegetation locations requiring fuel breaks or hazard tree removal throughout Alpine County Approved Project lands.

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### PROPOSED PROJECT

This section describes the proposed modification to the Approved Project. The proposed refers to section 4, Implementation Plan, of the IS/MND, whereas *"All live and dead vegetation less than 10 inches dbh would be cut, as well as most dead trees over 10 inches dbh."*; be modified to increase the size class of live and dead vegetation dbh to 12 inches. The growth of respective vegetation since the MND was executed has outpaced the ability to perform all the current fuels reduction projects and will limit opportunity for future projects. This modification is necessary to perform green work in Alpine County to implement prescriptions for fuels reduction and fire safety. Living vegetation in these project areas has grown over the years since this IS/MND was approved, therefor an increase in dbh size will allow for continued treatment throughout county projects.

## Environmental Analysis

As described in the section above, Standard for Preparation of an Addendum, this Addendum has been prepared pursuant to CEQA Guidelines Sections 15162 and 15164 to determine whether implementation of the Modified Project would result in any new impacts or substantially more severe significant environmental impacts than were previously analyzed in the approved IS/MND. Accordingly, this Addendum only considers the extent to which the proposed changes could result in new or substantially more severe significant impacts; it does not reevaluate impacts that would remain consistent with the analysis in the approved MND. The environmental topic areas analyzed in the approved IS/MND include:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Parks and Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

The Modified Project would not change site-specific designs or proposed development, when compared to the Approved Project. The Modified Project would not require any revisions to the environmental conclusion contained in the approved IS/MND. The proposed change to the diameter at breast height (dbh) of the trees does not change the amount of development, alter the active construction timeline, or result in any new information of substantial importance affecting the physical impacts to the environment. Through the 2-inch increase in dbh, this modification allows a greater portion of the surrounding community to have better defensible spaces. Table 1, *Comparison of Impacts of the Approved Project, and Modified Project*, summarizes the impacts of the proposed modifications to the approved IS/MND compared to Approved Project.



Table 1: Comparison of Impacts of the Approved Project and Modified Project

Environmental Impacts of the Modified Project, as Compared to Impacts in the Approved IS/MND:

Topic	Same Impact as Approved IS/MND	Less Impact than Approved IS/MND	New Significant Impact or More Substantial Impact
Aesthetics	X		
Air Quality	X		
Biological Resources	X		
Cultural Resources	X		
Energy	X		
Geology and Soils		X	
Greenhouse Gas Emissions	X		
Hazards and Hazardous Materials		X	
Hydrology and Water Quality	X		
Land Use and Planning	X		
Noise	X		
Population and Housing	X		
Public Services	X		
Parks and Recreation	X		
Transportation	X		
Utilities and Service Systems	X		
Wildfire		X	

Based on the information provided in this Addendum, and the absence of site-specific design changes in the Modified Project, implementation of the Modified Project would not result in any new impacts or increase the severity of previously identified significant impacts analyzed in the approved IS/MND. The proposed modifications to the Approved Project would not result in a substantial change to the project and, therefore, additional environmental review is not necessary.

## Conclusion

As summarized below, and for the reasons described in the section above, *Environmental Analysis*, of this Addendum, Alpine County has concluded that the Modified Project would not result in any new significant impacts not previously identified in the approved IS/MND; nor would it result in a substantial increase in the severity of any significant environmental impact previously identified in the approved IS/MND. For these reasons, a subsequent EIR is not required, and an Addendum to the approved IS/MND is the appropriate CEQA document to address the Modified Project. This section provides an evaluation of the Modified Project in light of the conditions listed in CEQA Guidelines Section 15162.



## SUBSTANTIAL CHANGES TO THE PROJECT

The proposed changes under the Modified Project would be to comply with identified need to maximize wildfire protection of the affected community and optimize the use of grant funds to accomplish wildfire resiliency within the target protection areas. As stated above, this is not a substantial change to the Approved Project analyzed in the approved IS/MND. Consequently, there are no substantial changes proposed to the Approved Project that will require major revisions of the previous IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

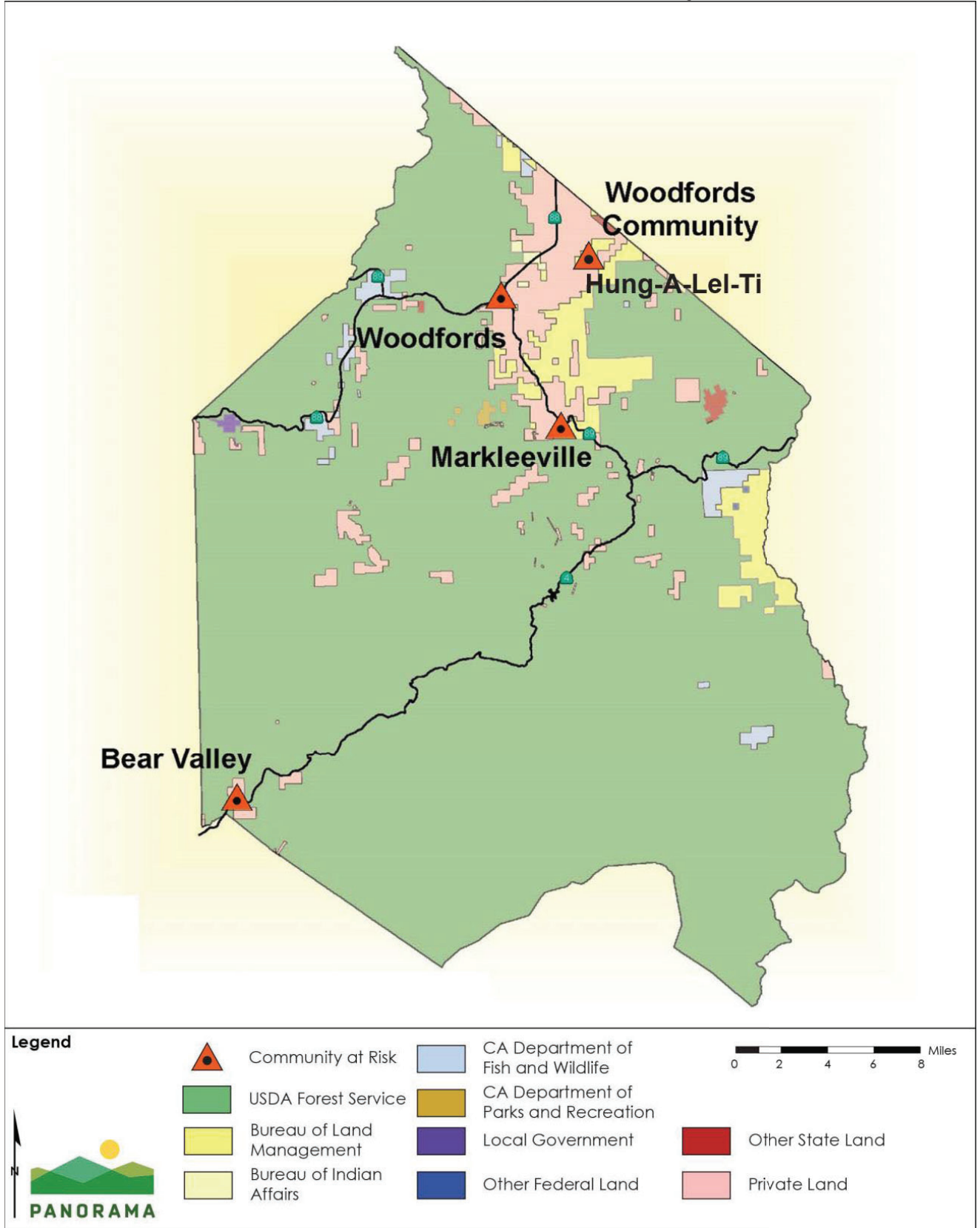
## SUBSTANTIAL CHANGES IN CIRCUMSTANCES

As described above in the environmental analysis, the Modified Project would not result in new significant environmental impacts beyond those identified in the approved IS/MND, would not substantially increase the severity of significant environmental effects identified in the approved IS/MND, and thus would not require major revisions to the approved IS/MND. The Modified Project, therefore, is not substantial and does not require major revisions to the approved IS/MND or a subsequent IS/MND. In addition, the physical conditions within the project area have not changed substantially, barring the moderate growth of vegetation since the approval of the IS/MND.

## NEW INFORMATION

No new information of substantial importance, which was not known and could not have been known when the approved IS/MND was approved, has been identified which shows that the Modified Project would be expected to result in: 1) new significant environmental effects not identified in the approved IS/MND; 2) substantially more severe environmental effects than shown in the approved IS/MND; 3) mitigation measures or alternatives previously determined to be infeasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project sponsor declines to adopt the mitigation or alternative; or 4) mitigation measures or alternatives which are considerably different from those identified in the Certified EIR would substantially reduce one or more significant effects of the project but the project sponsor declines to adopt the mitigation measure or alternative.

# Attachment B: Maps of Alpine County Approved Project





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California Governor’s Office  
**Land Use and Climate Innovation**  
 CEQA State Clearinghouse  
 1400 Tenth Street  
**Sacramento, CA 95814**

Jason Moghaddas  
 Director of Operation, California RPF #2774  
 Spatial Informatics Group  
 2529 Yolanda Ct.  
 Pleasanton, CA 94556

November 5, 2024

**Concurrence Letter: Alpine County Wildfire Risk Mitigation Plan Final IS/MND Addendum**

**CEQA Clearing House SCH No. 2020120147:**

In accordance with the CEQA Guidelines, the County has determined that an Addendum to the approved IS/MND is the appropriate environmental document for the Modified Project.

This Addendum reviews the changes proposed by the Modified Project, and as a Registered Professional Forester, and original co-author of the approved project, I concur that all CEQA factors of direct, indirect and cumulative effects remain unchanged by this modification.

The modified project outlined in the addendum, see Attachment A, prescribes increasing the size class of vegetation from 10” to 12” diameter at breast height (DBH). This amendment to size class is reasonable and accommodates the growth rate of forested lands since the IS/MND was approved in 2021.

It is understood and supported that this modification to the approved project will benefit the County and surrounding forested areas by supporting continued fuels management and hazard reduction. This modification amends environmental impacts to “less impact” in geology and soils, hazards and hazardous materials, and wildfire risk in the approved IS/MND 2020120147.

Sincerely,

Jason Moghaddas  
 RPF #2774

**Attachments (1):**

- A. Alpine County IS/MND Implementation Plan Addendum



## **Attachment A: Alpine County Wildfire Risk Mitigation Final Initial Study/Mitigated Negative Declaration**

[https://www.alpinecountyca.gov/DocumentCenter/View/4315/Alpine-County WRMP ISMND final signed-Appendix-AB?bidId=](https://www.alpinecountyca.gov/DocumentCenter/View/4315/Alpine-County_WRMP_ISMND_final_signed-Appendix-AB?bidId=)