

**Addendum to the Negative Declaration  
for the  
Calaveras Big Trees State Park  
Vegetation Management Plan  
SCH no. 2018022051**



*Prepared by:*

**California Department of Parks and Recreation**

Facilities & Development  
2241 Harvard Street, Suite 200  
Sacramento, California 95815  
*Contact: Brad Michalk*

**October 2023**

# **Addendum to the Initial Study and Negative Declaration for the Vegetation Management Plan at Calaveras Big Trees State Park**

## **Introduction**

Calaveras Big Trees State Park (CBTSP) comprises approximately 6497 acres and is located in Calaveras County, approximately 80 miles east of the City of Stockton in San Joaquin County (Figure 1). The City of Angels Camp is located 25 miles southwest and the community of Arnold is closest to the park, approximately six miles southwest. State Route (SR) 4 provides direct access to and bisects the Park north-south (Figure 1).

State Parks prepared a Vegetation Management Plan (VMP) and Initial Study/Negative Declaration (IS/ND) for CBTSP. Management Plans are subject to a comprehensive and programmatic environmental review according to California Environmental Quality Act (CEQA) guidelines in PRC Section 21000 et seq. A VMP addresses the management of vegetative resources, which helps to ensure continuity of actions toward mutually accepted management goals and objectives over time. Funding for this effort was provided by the Sierra Nevada Conservancy, an agency of the State of California.

The VMP was approved, and the IS/ND adopted by the Central Valley District of California State Parks on June 25, 2018, in Columbia, CA. The IS/ND provides the basis for second-level environmental reviews, providing more detailed information and analysis for site-specific vegetation management efforts.

Since the VMP approval, the district has been conducting a range of fuel management activities pursuant to the Plan but indicates now that as written, the Plan creates limitations that constrain achieving their goals of managing the extremely high fire threat at CBTSP. Consequently, they have requested that minor revisions be made to the Plan to permit prescribed burns to continue.

## **Applicability and Use of an Addendum**

Under CEQA, lead agencies must conduct an evaluation of proposed changes to a project in order to determine whether further environmental analysis is required. (Pub. Resources Code § 21166; CEQA Guidelines, § 15162.) Once an EIR or mitigated negative declaration has been completed for a project, a lead agency may not require preparation of a subsequent environmental review unless the conditions set forth in Public Resources Code section 21166 and CEQA Guidelines section 15162 are satisfied.

Pursuant to CEQA section 21166, when a previous environmental review for a project has been prepared and approved, no subsequent or supplemental environmental review shall be required unless:

---

Addendum to IS/ND for the Vegetation Management Plan at Calaveras Big Trees State Park

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

CEQA Guidelines section 15162 further clarifies that:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
  - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - (C) 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 proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

If none of the conditions set forth in CEQA Guidelines section 15162(b) allowing a lead agency to prepare a subsequent negative declaration are met, CEQA Guidelines section 15164 authorizes the lead agency to prepare an addendum to the previously approved negative declaration. In relevant part, CEQA Guidelines section 15164 states:

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

### **Revision to the Vegetation Management Plan (Project Description):**

Chapter V, Section F of the VMP identifies constraints to achieving objectives of the plan, specifically with respect to smoke management. As noted above, the District advises that the steps identified to manage smoke are too limiting in practice to achieving their goals of managing the extremely high fire threat at CBTSP. Consequently, they have requested that minor revisions be made to these steps that would allow prescribed burns to continue to meet their goals.

The wording of the original constraints is identified in strikeout below, followed by the proposed revised language (in underlined text):

#### ***a. Adherence to fuel moisture requirements:***

~~If smoke is expected to be a problem, burning can be performed when the fuel moisture stick readings are at the low end of typical prescriptions, 8 to 9 percent. Combustion of dry fuels is more complete and particulate matter size smaller, than that of moist fuels. The Prescribed Burn Boss must be careful not to sacrifice safety from fire escape to minimize smoke by this means.~~

Due to the necessity of needing fuels to be dry enough to meet both pile and broadcast burn objectives, fuel moisture is usually not as much of a factor contributing to negative smoke impacts relative to unit size and high fuel loadings. The typical 10-hour (size class between ¼ and one inch) fuel moisture prescription in most burn plans is between 5-15%. 10-hour fuel moisture will be monitored for two weeks prior to ignition. The Burn Boss shall adhere to the burn prescription with no ignition occurring if fuel moisture is outside the identified range in the burn plan, unless an amendment has been prepared and approved by the District Superintendent.

**b. Limiting the size of the burn:**

~~Large burn units can usually be divided into small sub-plots that can be burned in a single day. This offers the opportunity to limit daily smoke emissions by reducing the chance of overnight generation. If conditions allow, these larger units might then be treated in a series of single-day projects.~~

Typically, burn units can be segmented into small enough plots that can be burned in a single day. However, this may not always be possible with unfavorable terrain and a lack of natural or man-made barriers. In the event a burn cannot be subdivided into a single day plot, the Burn Boss may limit the area ignited to avoid adverse smoke impacts. This will usually only be necessary in the northwest corner of the park where there are neighboring subdivisions. Other Park locations are remote enough where adverse smoke impacts are extremely unlikely to occur.

**e. Burning minimal amounts of green material:**

The moisture in green material carries high amounts of particulate matter into the air, which is most likely to be a problem during rare spring burn operations. Broadcast burning inherently entails burning of green material to meet burn objectives. However, the VMP requires consultation and coordination with other agencies to minimize the potential cumulative effects of particulate matter.

To minimize adverse smoke impacts and ensure vegetative material is consumed, green material should not be burned during any pile burning. Cut and piled material should be given ample time to cure and dry to ensure complete combustion and minimal emissions through clean burning.

**f. Burning When the Transport Wind Carries the Smoke Away from Smoke Sensitive Areas:**

Sensitive areas within the unit should also be considered. Predicted transport winds are a factor in determining when there is an appropriate burn window to proceed

with ignition. Additionally, all burn windows must be approved by the local Air Quality Management District, who considers transport winds when giving a burn authorization. The Burn Boss will ensure that smoke production and transport direction are monitored throughout all prescribed burning. The VMP requires a smoke management plan to be included in each prescribed burn plan that should be followed to minimize exposure to smoke.

### **Environmental Impacts Associated with the Modified Project:**

The 2018 Initial Study contained the following analysis to address the impact of smoke on local air quality.

b) As noted in Section V.D.1 of the VMP, CSP will manage prescribed fires in such a manner (e.g. limiting size of burn, minimizing burning of green material, and termination of the burn if smoke behavior cannot be addressed) so as to minimize smoke to visitors as well as surrounding residents. Additionally, Section XIII-D requires a Smoke Management Permit from the local Air Pollution Control District. As such, implementation of VMP will not result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation.

c) Biomass burning smoke from wildfires can have a significant impact on PM<sub>2.5</sub> concentrations and ozone thereby affecting air quality. As noted in the environmental setting above, both Counties are designated as unclassified for PM<sub>2.5</sub>, while both counties are classified as non-attainment for ozone. Cumulative AQ impacts could potentially result if other agencies (e.g. US Forest Service) conduct prescribed burns at the same as those within the CBTSP. However, the VMP notes that CSP must consult and coordinate timing for proposed prescribed burns with other such agencies to minimize potential cumulative effects.

Prescribed burns, when implemented under specified fuel, meteorological and dispersal conditions provide a beneficial role while minimizing smoke impacts by consuming fuels that feed wildland fires (Huey, 2017). As such, prescribed burning is an effective method to reduce fine particle emissions, and as such, implementation of the VMP with its prescribed burning component, would reduce cumulative impacts to a less than significant level.

d) Section V.D.1 of the VMP identifies the sensitive receptors near CBTSP. Most of the sensitive receptors are park facilities and park residences. It notes that prescribed fire treatments in the southern part of the park from 1975-2011 rarely resulted in unsatisfactory air quality. Downslope smoke drainage at night has occasionally resulted in smoke drifting into Forest Meadows (downslope from Arnold and between the Stanislaus River and State Route 4). Adherence to Standard Project Requirements SPR AIR 1 through AIR 7 however will ensure that impacts from smoke on sensitive receptors would remain at a less than significant level.

The reference to Standard Project Requirements (specifically SPRs AIR 1, 2, 5, &

6) correlates to the VMP changes noted in the strikeout text above. Consequently, this addendum examines if textual changes to the VMP will also require corresponding changes to these Standard Project Requirements, which are noted in underlined text. It also considers whether the textual changes would result in potentially significant impacts on the environment.

***SPR AIR 1 Adherence to Fuel Moisture Requirements:***

*Prescribed burns and biomass burning shall be performed only when the fuel moisture stick readings are at the low end of typical prescriptions, ~~8 to 9 percent~~ 5-15%.*

The only change required for this Standard Project Requirement is with respect to an increase in moisture stick readings of up to 6% over what was previously permitted. As noted in the proposed VMP revisions above, fuel moisture is usually not as much of a factor contributing to negative smoke impacts relative to unit size and high fuel loadings. Furthermore, a prescribed burn must still comply with all the other requirements that address smoke impacts in sensitive areas.

***SPR AIR 2 – Burn size Limitations:***

*Large burn units shall be divided into small sub-plots that can be burned in a single day. As conditions allow, these larger units should be treated in a series of single-day projects.*

No changes are required for this Standard Project Requirement since it allows flexibility for larger unit burns as it is currently worded.

***SPR AIR 5 – Burning Minimal Amounts of Green Material:***

*Burning of green material should be minimized to the extent possible.*

No changes are required to this Standard Project Requirement since the revised VMP will continue to require that green material not be burned during pile burning activities.

***SPR AIR 6 – Sensitive Areas:***

*Burning shall be conducted when weather forecasts predict that transport wind will carry smoke away from smoke sensitive areas.*

No changes are required to this Standard Project Requirement since this measure will still be required with the proposed VMP revisions.

Finally, under the Geology and Soils analysis of the Initial Study, Project Specific Requirement *PSR HYDRO 1 – Erosion Control and Pollution Prevention* was adopted to ensure that exposures to landslides would not occur as a result of this prescribed burns undertaken under the VMP. Specifically, it included appropriate BMPs necessary to prevent slope failures caused by excess water on exposed slopes. This Addendum includes a correction to this requirement that more

appropriately assigns the responsibility to the District Environmental Scientist or the Project Manager, rather than the burn boss. Additionally, the change would clarify that this requirement would be subject to its necessity by the District's Chief of Natural Resources. These changes would result in no change to the CEQA analysis.

*~~Burn boss~~ A DPR Environmental Scientist or Project Manager shall implement a Storm Water Soil Loss Prevention Plan (SWSLPP) if determined necessary by the Central Valley Chief of Natural Resources. The plan shall include monitoring the weather forecast, and conducting site inspections before, during, and after storm events. CSP will cease vegetation management activities if measurable rain event with 20% or greater probability is predicted within 24 hours. This probability is expected to be the threshold for creating runoff at the burn site and will be determined by monitoring the National Weather Service's forecast for the project area. CSP defines "measurable rain" as any rainfall that can be detected. Protective measures to prevent water-quality alterations resulting from soil erosion and sedimentation will be implemented and maintained. ~~Burn boss~~ A DPR Environmental Scientist or Project Manager shall perform daily inspections of sediment-control devices during storm events.*

*Burn operations, such as stockpiling of materials, storage of portable equipment, staging area is defined, then all staging areas will be limited to the hardened surfaces of roads, parking areas unless reviewed and approved by the DPR Archeologist, and Environmental Scientist assigned to the project. All operations shall be confined to the minimal area necessary. Ground disturbance in the floodplain shall be limited to the minimum necessary to achieve the project goal.*

*Prior to the start of any ground-disturbing activities, ~~the burn boss~~ a DPR Environmental Scientist or Project Manager shall prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) for DPR approval that Identifies temporary Best Management Practices (BMPs) and permanent (e.g., preserving or planting of vegetation) for use in all burn areas to reduce or eliminate the discharge of soil, surface water runoff, and pollutants during all excavation, grading, trenching, repaving, or other ground-disturbing activities. The SWPPP will include BMPs for hazardous waste and contaminated soils management and a Spill Prevention and Control Plan (SPCP), as appropriate.*

#### New Information

Based on its review of the modified project and its familiarity with the project environment, DPR has determined that there is not any new information that was not available at the time of the previous IS/ND that would show that the Project may have new or previously unexamined significant impacts on the environment.

#### Cumulative Impacts

Based on its review of the modified Vegetation Management Plan and its familiarity with the Project environment, DPR has determined that there is not any new information that was not available at the time of the previous IS/ND that would show



that the Project may have new or increased cumulative impacts on the environment.

**Conclusions:**

The modified Vegetation Management Plan would not result in any new or substantially more significant impacts than those examined in the IS/ND. Moreover, there is no new information and there are no changed conditions that would result in any new or substantially more significant impacts than those examined in the IS/ND.

Because the elements of the Plan will remain the same as the Plan previously examined in the attached IS/ND, with the exception of the modifying Standard Project Requirement SPR AIR 1, all direct impacts would remain the same as those identified in attached IS/ND in the absence of any changed conditions in the environment.

Based on its review of the modified Plan and its familiarity with the CBTSP, DPR has determined that the environment in the Plan location has not changed in a way that would result in previously unexamined environmental impacts from the Project or an increase in the severity of any of the previously examined environmental impacts.

This Addendum included only minor textual changes. Therefore, the physical effects on the environment are the same. Minor text changes have been found to be consistent as those identified and contemplated under the original IS/ND. Based on these circumstances, the Vegetation Management Plan as modified above does not trigger any of the circumstances that would require preparation of a subsequent EIR or negative declaration under Public Resources Code section 21166 or CEQA Guidelines section 15162, as further set forth in this Addendum.

**Mitigation Measures and Project Requirements:**

Based on its review of the modified Vegetation Management Plan and its familiarity with the Project environment, DPR has determined that there is not any new information that was not available at the time of the previous IS/ND that would necessitate mitigation measures beyond the Standard and Project Specific Requirements previous identified (and as modified herein).