

Alpine County Wildfire Risk Mitigation Plan IS/MND

Amendment to MM Cultural-1: Avoidance of Impacts to Cultural Resources

Alpine County – CEQA Lead Agency
Department of Community Development
50 Diamond Valley Rd. Markleeville, CA 96120

This request is to amend the methods of cultural mitigation as defined in the Initial Study/Mitigated Negative Declaration (IS/MND) for Alpine County wildfire risk projects, as defined in the Wildfire Risk Mitigation Plan (WRMP). As the Lead Agency for these projects, the proposed amendment will preserve the resource protection requirements of cultural mitigation efforts while providing for project flexibility to accommodate access to WUI fuels reduction sites. The Approved Projects in the WRMP IS/MND are CEQA compliant as the Tiered PTAs are covered by the programmatic CalVTP EIR, which states: *If the project proponent finds that the impacts were analyzed in the Project Environmental Impact Report (PEIR) and no new or substantially more severe significant effects could occur or no new mitigation measures would be required for a subsequent treatment project, the project can be found to be within the scope of this PEIR. In this circumstance, no additional CEQA documentation would need to be prepared or publicly circulated (State CEQA Guidelines Section 15168[c][2] and [4]). The documentation used to substantiate the “within the scope” finding would provide the substantial evidence required to reach that conclusion.*¹

Purpose and Need of Request:

The purpose of this amendment is to allow the project proponent to complete vegetation treatments in areas that have access restrictions to include WUI fuel treatment imposed by Environmentally Sensitive Areas (ESA) buffers. Existing protocol regulates avoidance of cultural resources with a 100-foot avoidance buffer. This amendment provides for adjustment of ESA buffers by a qualified cultural resource (CR) specialist/archaeologist. The adjustment of the buffer zone shall not impact the protected resource.

- **Current IS/MND Mitigation Measures²:** The following measures shall be implemented during vegetation management activities within any PTA where cultural resources have been inventoried or recorded:
 - Prior to initiation of fuels management activities, a 100-foot radius surrounding each known cultural resource site shall be flagged by a qualified cultural resource specialist/archaeologist and designated as an environmentally sensitive area (ESA) .
 - Treatment activities within the 100-foot ESA shall be limited to hand thinning.
 - Mechanical thinning, access roads, skid trails, and staging shall not be permitted within the ESA. All vehicle access shall avoid the ESA, and only foot traffic shall be allowed within the delineated ESA boundary. Pile burning shall not be conducted within the flagged ESA.

Performance Standards and Timing:

- Before Activity: Flag a 100-foot ESA around all cultural resource sites within the PTA
- During Activity: Limit activities within the flagged ESA as appropriate
- After Activity: Remove flags

¹ Board of Forestry and Fire Protection
Final Program EIR for the California Vegetation Treatment Program (ES-7)

² Wildfire Risk Mitigation Plan Final IS/MND (MND-9)

- **Proposed Amendments:** Modified mitigation measures for Approved Projects, provides that no substantially significant impacts as previously defined by the IS/MND occur, and therefor comply with CEQA guidelines as defined above. Proposed mitigation measure:

- Prior to initiation of fuels management treatment activities, project locations will include a delineated avoidance radius (buffer zone) surrounding known cultural resource sites and flagged or visually monitored by a qualified Cultural Resource (CR) Specialist/Archaeologist and designated as an environmentally sensitive area (ESA).
- Project locations requiring an adjustment to the 100-foot ESA avoidance buffer zone to accommodate site access, shall be flagged or visually monitored by a CR specialist prior to the initiation of fuels management activities.
- The adjusted ESA avoidance buffer zone shall be mapped and provided to Alpine County.
- The project proponent and contractor shall document activities in adjusted ESA avoidance buffer zones that have been delineated by the CR specialist. The CR Specialist shall ensure that alteration to the 100-foot radius, where required, avoids all impacts to the eligible registered cultural site.
- Vegetation treatments outside the ESA related to the adjusted ESA boundary shall be prescribed by the proponent.
- Mechanical thinning, access roads, skid trails, and staging shall not be permitted within the ESA. All vehicle access shall avoid the ESA, and only foot traffic shall be allowed within the delineated ESA avoidance buffer zone. Pile burning shall not be conducted within the flagged ESA.
- Treatment activities within the CR designated avoidance buffer zones shall be limited to hand thinning.

Performance Standards and Timing:

- Before Activity: Flag an ESA around all cultural resource sites within the PTA
- During Activity: Limit activities within the flagged ESA as appropriate
- After Activity: Remove flags

Benefits: Fuels management treatment methods used to satisfy PTA's defined in the Alpine County Wildfire Risk Mitigation Projects, include mechanical and hand thinning. Flagged access within the CR designated ESA avoidance buffer zone allows for the transit of equipment necessary to effectively remove hazard materials in a cost effective manner.

Movement of equipment through the adjusted avoidance zone buffer does not present a risk to a cultural resource as the standard 100-foot buffer surrounds the recorded site. Adjustment to the ESA boundary and adherence to the adjusted avoidance zone boundary preserves cultural resource protections within the project area.

This action benefits the community by reducing wildfire risk and environmental impacts such as removal of high risk fuels, hazard tree conditions, and has a less than significant change to air quality, noise pollution within the scope of the project outlined in the WRMP IS/MND. This amendment aligns with the county's goals for cultural preservation while decreasing the Alpine County community wildfire severity zones.