

Notice of Exemption

21-2021-130

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044
County Clerk County of: Marin
Marin Civic Center
3501 Civic Center Dr., Suite 234,
San Rafael, CA 94903

From (Public Agency):
Marin Wildfire Prevention Authority
28 Liberty Ship Way, Suite 2800
Sausalito, CA 94965

FILED

JUL 21 2021

SHELLY SCOTT
MARIN COUNTY CLERK
BY: J. GILBERT, Deputy

Project Title: Curbside Chipper Program

Project Applicant: Marin Wildfire Prevention Authority

Project Location – Specific: Residential vegetation removal on private properties throughout Marin County (refer to Figure 1).

Project Location – City:
Unincorporated and incorporated communities throughout the County

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:

The purpose of the project is to provide an opportunity for reduction and disposal of hazardous vegetative buildup in defensible space around homes in Marin County, thereby contributing to a decrease in wildland fire hazards. FIRESafe MARIN, Novato Fire Protection District, City of San Rafael Fire Department, and Bolinas Fire Protection District are working with MWPA to implement the project, which would assist communities, homeowner's associations, fire departments, and individual landowners with vegetation-fuel reduction to reduce wildfire hazards in Marin County. Many of the communities and neighborhoods served by this project are registered Firewise communities (CAL FIRE, 2021). Creating fire adaptive communities is not only about reducing fire threat from fire growth but also improving the safety of the residents. Creating defensible space is a critical component to long term fire adaptive safety.

Name of Public Agency Approving Project: Marin Wildfire Prevention Authority

Name of Person or Agency Carrying Out Project: Marin Wildfire Prevention Authority

Exempt Status (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Common Sense Exemption (Sec. 15061(b)(3));
- Categorical Exemption. State type and section number: Section 15304(i). Minor alterations to land for fuel management activities. Section 15301. Existing Facilities for the management of vegetation for existing developed properties.
- Statutory Exemptions. State code number: _____

POSTED 7/21/21 TO 8/21/21

Reasons why project is exempt:

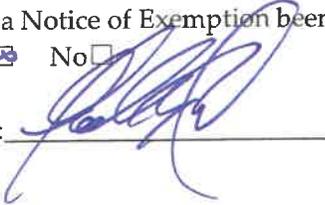
The project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines Section 15304(i), Class 4 Minor Alterations to Land and Section 15301, Class 1 Existing Facilities. A Class 4 exempt project consist of minor alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. The chipper results in the removal of vegetation debris from the land, which is considered the alteration to land. A Class 1 exempt project consist of operation, repair, maintenance, or minor alterations of existing structures, facilities, or topographical features, involving negligible expansion of existing or former use of the site. Such projects include, but are not limited to, management of existing landscaping or native growth. The chipper program would dispose of hazardous vegetation removed by homeowners from existing developed properties native growth and involving no physical expansion of any development or use of sites. Additionally, no healthy, mature, scenic trees would be removed; no work would take place within sensitive habitat, including wetlands or waterways; and no ground disturbance, such as excavation, would take place. There are no facts or circumstances specific to this project that would support an exception to the categorical exemption. No exceptions listed under Section 15300.2 apply.

Lead Agency Contact Person:
Mark Brown

Area Code/Telephone/Extension:
415-246-0280

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project?
Yes No

Signature: 

Date: 7/16/2021

Title: EXECUTIVE OFFICER

Signed by Lead Agency

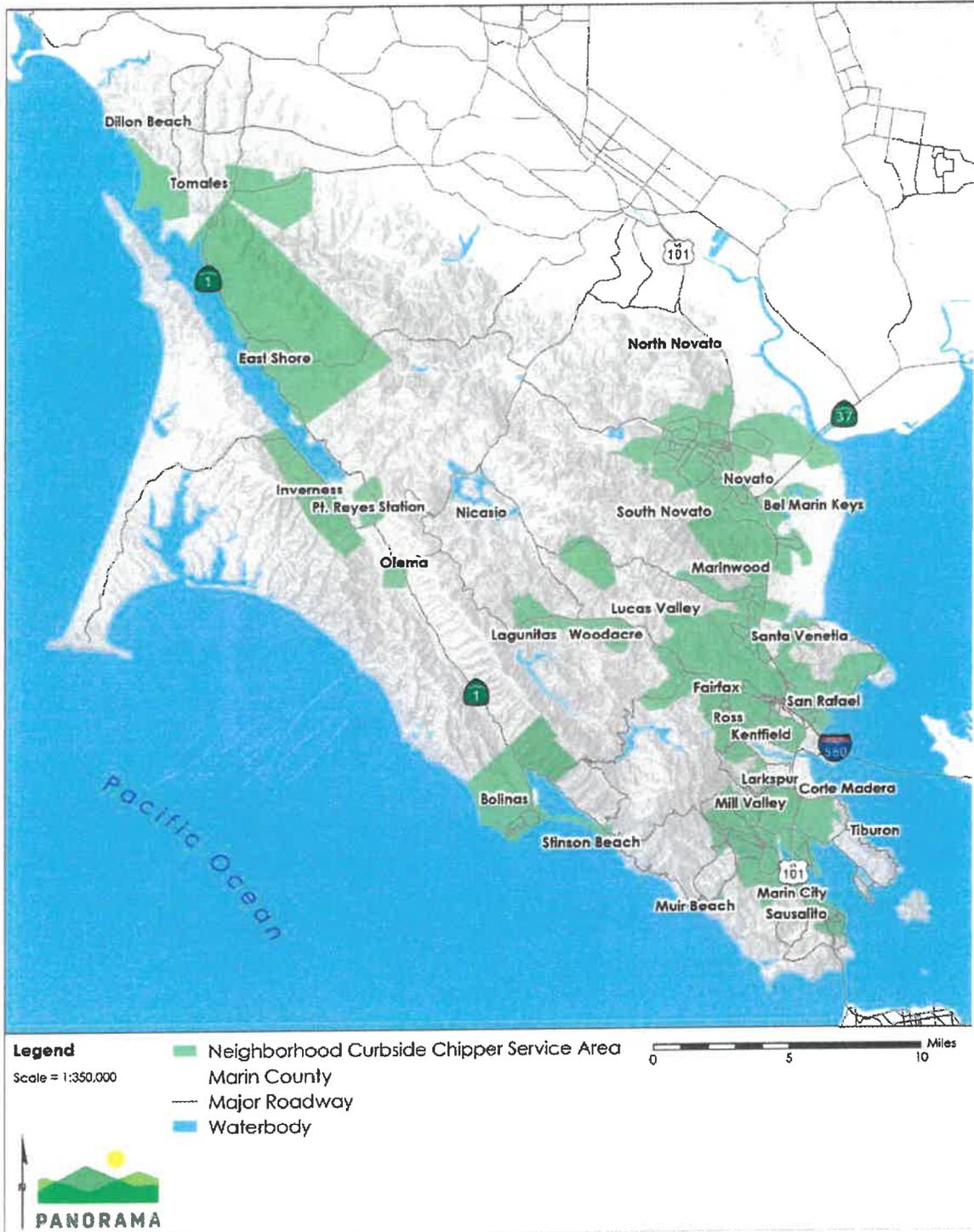
Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.

Date Received for filing at OPR: _____

Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Figure 1 Chipper Program Areas





**California Environmental Quality Act
Categorical Exemption Determination Memorandum**

Date: July 15, 2021

Project: Curbside Chipper Program¹

Categorical Exemption Summary

The Marin Wildfire Prevention Authority (MWWPA) has determined that the Curbside Chipper Program (project) is exempt under the California Environmental Quality Act (CEQA), pursuant to the following Categorical Exemptions:

- Section 15304 (Minor Alterations to Land): exempts projects that consist of minor alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. The chipper results in the removal of vegetation debris from the land, which is considered the alteration to land
- Section 15301 (Existing Facilities): exempts projects that consist of operation, repair, maintenance, or minor alterations of existing structures, facilities, or topographical features, involving negligible expansion of existing or former use of the site. Such projects include, but are not limited to, management of existing landscaping or native growth. The chipper program would dispose of hazardous vegetation removed by homeowners from existing developed properties native growth, and involving no physical expansion of any development or use of sites.

The project involves use of a trailer-mounted chipper and a chipper truck to help residents throughout Marin County dispose of larger amounts of fire-hazardous vegetation with free community curbside chipping and material pick-up. The general locations where chippers would be dispatched for curbside chipping are shown in Figure 1.

Residential vegetation removal on private properties as required by and in accordance with Public Resources Code (PRC) §4291 would occur prior to the project-related chipper activities. The Curbside Chipper Program is based on a “you cut, we chip” model. Homeowners are responsible for cutting, gathering, and then piling vegetation from around their homes at a roadside location. Flashy fuels like grasses and shrubs typically grow throughout the rainy season and begin drying in late spring and summer months. Many invasive species, which can contribute to fuel loads and flashy fuels around homes are most effectively pulled in and

¹ Includes the West Marin Zone Bolinas Chipper Days, Novato Zone Chipper Days, and San Rafael Zone Chipper Days (Additional) projects.

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after the rainy season, depending upon the species. FIRESafe MARIN, Novato Fire Protection District, City of San Rafael Fire Department, and Bolinas Fire Protection District would provide chipping crews who visit neighborhood-by-neighborhood to chip vegetation on site or for removal. Chips would be hauled off at no cost to the homeowner.

Landowner implementation of the regulation for defensible space is not a project under CEQA, as there is typically no government permit or funding associated with the activity on private lands (PRC §21065). The chipper program provides fuel reduction and wildfire safety benefits by providing a free and convenient means to dispose of the combustible materials homeowners remove from their properties. Without the chipper program, homeowners would need to find another means to dispose of the removed materials. Through this model, residents have incentive to reduce the dangerous accumulation of vegetation around their homes required under law.

The following analysis demonstrates the chipping activities associated with the project would not result in adverse environmental effects, supporting the MWPA's determination that the proposed activities are exempt under CEQA. The project would be conducted in compliance with applicable federal, State, and local regulations and under contractual provisions prohibiting work in violation of applicable regulations and plans.

Information regarding the purpose and need for the project, a description of proposed activities, and an assessment of the potential for environmental effects are provided below.

Background

Marin County voters passed Measure C in 2020, which established a 17-member Joint Powers Authority, the MWPA, to fund and oversee proactive state-of-the-art wildfire prevention and preparedness efforts within Marin County. Members include several cities and towns, fire protection districts, and community service districts. The MWPA was formed to develop and implement a comprehensive wildfire prevention and emergency preparedness plan throughout almost all of Marin County. This project is a Core Project that is funded by and within the purview of the MWPA. Core Projects include those projects that focus on wildfire detection, notification, and evacuation; vegetation management and fire hazard reduction; grants management; and public education.

Purpose and Need

The purpose of the project is to provide an opportunity for reduction and disposal of hazardous vegetative buildup in defensible space around homes in Marin County, thereby contributing to a decrease in wildland fire hazards. FIRESafe MARIN, Novato Fire Protection District, City of San Rafael Fire Department, and Bolinas Fire Protection District are working with MWPA to implement the project, which would assist communities, homeowner's associations, fire departments, and individual landowners with vegetation-fuel reduction to reduce wildfire hazards in Marin County. Many of the communities and neighborhoods

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served by this project are registered Firewise² communities (CAL FIRE, 2021). Creating fire adaptive communities is not only about reducing fire threat from fire growth but also improving the safety of the residents. Creating defensible space is a critical component to long term fire adaptive safety.

Project Description

Activity

The proposed chipping activity would occur throughout communities and neighborhoods in Marin County, as shown in Figure 1.

Residents within the areas shown in Figure 1 would register with FIRESafe Marin to opt into the curbside chipper program. For residents in the community of Bolinas, City of Novato, and City of San Rafael, additional chipper days would be available by phoning Bolinas Fire Protection District, Novato Fire Protection District, or City of San Rafael Fire Department to schedule. Residents are required to leave vegetation piles at the curb by 8:00am on the Monday of the week they registered for. The proposed activity would involve the use of a trailer-mounted chipper and a chipper truck traveling to registered residences to dispose of fire-hazardous vegetation that has been removed from each residential property by the landowner.

Tree limbs up to 8 inches in diameter, shrubs, brush, limbs, woody bushes, broom species, cypress, juniper, firewood would be allowable in the chipper. Trash, poison oak, blackberry brambles, construction materials, lumber, regular yard waste, leaves, lawn clippings, bamboo roots, roots with rocks/gravel/dirt, and bagged or tied materials of any kind would not be chipped or taken for the safety of the chipper crews.

Activity Method and Disposal

A trailer-mounted chipper with the capacity to accept up to 8-inch-diameter vegetation and a chipper truck would be driven to the registered residences. Vegetative material would be fed into the chipper and the chipped material would be hauled away for disposal. An estimated up to 26,800 cubic yards of vegetative material would be disposed of annually. Typically, each chipper truck makes one disposal trip per day. Disposal sites include West Marin Compost, Marin Resource Recovery Center, Bolinas-Stinson Resource Recovery Project, and Redwood Landfill Inc. Most of the vegetative material would be trucked to Stockton and used for conversion to energy.

² Firewise communities are local neighborhoods or communities that have taken appropriate measures meeting specific criteria put forth by the National Fire Protection Association to become more resistant to wildfire structural damage.

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Workers

Contractor crews would conduct the chipping at registered residences within Marin County. Each contractor crew would be comprised of 3 persons. Up to five contractor crews may be operating within Marin County on a single day.

Site Access

The trailer-mounted chipper and chipper truck would operate along public roads in residential areas. While the majority of the roads are paved, there are some public roads in remote areas that are not paved and are dirt/gravel.

Schedule and Duration

Chipping would occur for up to 5 days (Monday through Friday) in each of the specific areas shown in Figure 1. The various roads within each area would be visited by a chipping crew for up to one week, typically twice a year and chipping would occur from 8:00am to 5:00pm. Chipping in front of any one residence is expected to only take a few minutes to an hour or so, and then the chipper moves to the next residence along the road (similar to refuse disposal). Chipping activities would be anticipated to occur for up to 210 days per year. Project activities are anticipated to start in mid-May and be completed by the end of October for the first year at many locations in the county. In future years, chipper days between October and February may also be offered county-wide. Additional chipper days are offered in Novato from August to February. The timing of the chipper days is aligned to ensure optimal use as landowners typically conduct vegetation removal activities after the growing season, which is typically in late winter and spring.

Discussion of Exceptions (Section 15300.2)

(a) Location:

Sensitive habitats, including watercourses and wetland areas would be avoided, therefore, exception (a) does not apply. The chipper would remain on established roads in residential areas.

(b) Cumulative Impact:

Chipping would generate noise, but the noise would be of a short duration at any one residence, lasting from a few minutes to up to an hour with intermittent noise. Other residential noises are likely intermittent as well and the chipper would not have a significant contribution to an otherwise cumulative noise impact. Most other work is transient. If construction or other work is going on in the vicinity of the chipper, that work would follow local codes and ordinances for construction noise. Defensible space work may also generate noise; however, the work would likely be completed by the time the chipper is operated along a street or neighborhood and thus would not cumulatively combine. As such, the project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

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(c) Significant Effects due to "Unusual Circumstances":

No unusual circumstances would occur. The chipper would operate in residential areas, on existing roads outside residences for a few minutes to up to an hour at each residence. The work is only comprised of chipping piled fuels by the homeowner and as such, no ground disturbance would occur from chipping that could impact plants or wildlife or sensitive species. The chipper generates noise but given chipping would occur from existing roadways in residential areas, subject to similar types of noise from residential activities such as landscaping and lawn care, trash disposal, and road usage, any listed species in proximity should be acclimated to noise. Noise is also temporary and of a short duration in any one location and is not expected to impact listed species. The chipper stays on roadways and as such would not impact sensitive waterways. No aesthetic impacts would occur as the project only includes chipping homeowner debris piled at the property line and roadways. Therefore, there are no unusual circumstances associated with the project or the environment in which it would be implemented, and exception (c) does not apply.

(d) Scenic Highways:

The work would not result in any visible impacts from scenic highways. The chipper would remain at a residence for the duration of the chipping and then move to the next residence.

(e) Hazardous Waste Sites:

Work would occur along roadways and would only involve a truck and chipper. No intense ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

(f) Historical Resources:

The project does not include any ground disturbance and would be performed from existing roads in front of residences. No potential for impacts to cultural resources would occur. Therefore, exception (f) does not apply.

Environmental Assessment

Aesthetics		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project involves the use of a chipper and chipper truck along public roadways within Marin County. Other vehicles utilize these existing roads, and the addition of the chipper and chipper truck for up to a few hours in each location and for a few minutes to an hour or so in front of each residence would not result in visual impacts. Use of the chipper and chipper truck would be temporary, and the vehicles would not be located at any one location for more than a few hours. Significant adverse effects to aesthetics would not occur.

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Agriculture and Forestry Resources		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The use of the chipper and chipper truck would not convert or cause or cause changes that would result in the conversion of designated farmland to non-agricultural uses. Chipping activities would occur from public roadways and as such would not result in the loss of forest land nor would it convert forestry land to non-forestry use. Adverse effects on agriculture and forestry resources would not occur.

Air Quality		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

In a given day, it is assumed that the chipper and chipper truck would operate for approximately 8 hours per day and one off-haul truck trip of the chipped material to a green waste disposal center would occur. Activities would be conducted for up to 210 days a year, which would not result in generation of air emissions in excess of Bay Area Air Quality Management District (BAAQMD) significance thresholds (CAPCOA, 2021). No tilling or grading activities that could generate fugitive dust emissions would occur. Significant air quality impacts would not occur.

Biological Resources		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The chipper and chipper truck would be parked along public roadways during chipping activities at each residence. No ground disturbance or off-road vehicle use would occur that could affect wildlife or plant species. Existing noise levels along roadways vary depending upon types of uses, residential density, and proximity to large roads and urban centers. Ambient noise levels along roadways in residential neighborhoods are expected to range from 55 to 75 dBA L_{dn} (Marin County, 2005). Intermittent noise is typical along the project roadways from residential activities such as yard work using mowers and leaf blowers, motorcycles, and heavy trucks. Noise levels associated with these typical activities include

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leaf blowers with noise levels of 76 to 81.5 dBA at 50 feet³, motorcycles with noise levels ranging from 70 to over 100 dBA at 50 feet⁴, and garbage trucks with noise levels ranging from 63 to 80 dBA at 50 feet⁵. The proposed trailer-mounted chipper could produce peak noise levels of 74 to up to 83 dBA L_{eq} at 50 feet and more typical averaged noise levels of 47.5 to 57 dBA L_{eq} ⁶. Chipping activities and equipment would not significantly increase the presence of or level of human activities along public roadways. While chipping activities could occur adjacent to trees along the public roadways during the nesting season, bird species present in such trees would generally be accustomed to existing intermittent noises from yard work and vehicles as well as human presence. The highest potential noise level for chippers would occur for 15- to 30-second intervals during infeed of materials. Noise levels from chipping are anticipated to be audible above ambient noise levels for up to 4 hours in any one "neighborhood" but not more than a few minutes to an hour or so in any one location, up to two times per year. Due to the limited duration of peak noise levels and existing sources of intermittent noises in typical neighborhoods, nesting birds are not expected to be adversely affected by chipping activities. Significant impacts on biological resources would not occur.

Cultural Resources and Tribal Cultural Resources ⁷		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

³ Calculated from noise level of 100 to 105.9 dBA at 3 feet away (operator distance) (Husqvarna, n.d.; Balanay, Kearney, & Mannarino, 2016).

⁴ The large range is due to variations in engines and mufflers across different motorcycle models (Rochat, 2013; USEPA, 1974)

⁵ Calculated from noise levels of 83 to 100 dBA at 5 feet away (IAC Acoustics, 2021; Work Safe BC, 2021).

⁶ Calculated from peak noise levels of 98.1 to 107.5 dBA $L_{eq, 30 \text{ sec}}$ and averaged noise levels of 71.9 to 81.1 dBA L_{eq} at approximately 3 feet away (operator distance; assuming trimmed and untrimmed wood typical of vegetation management activities) (Rottensteiner, Tsioras, Neumayer, & Stampfer, 2013; Brueck, 2008).

⁷ No tribal consultation requirement is associated with filing a notice of exemption per Assembly Bill 52 (PRC §21080.3.1.(b)).

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The chipper and chipper truck would operate from public roads during chipping activities and the project would not involve any ground-disturbing or off-road equipment use nor alteration of existing structures. No potential to disturb cultural resources would occur. Significant impacts on cultural resources would not occur.

Energy		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The vehicles and equipment that would be used for the project include a chipper and chipper truck, which would consume energy, including gas, diesel, and motor oil. Vehicle engines and fuel used during the project would comply with State and local energy reduction and efficiency requirements. The use of fuel for project activities would be minimal (up to four chippers and chipper trucks per day). Most of the chipped vegetation would be dropped off at a transfer center that brings materials to Stockton to be converted to energy, offsetting some of the energy used during implementation of the project. Implementation of the project would not cause a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Geology and Soils		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Vehicle travel and operation of equipment would occur on existing roads. Most roads are paved but some roads may be unpaved or gravel. Use of established unpaved or gravel roadways would not result in erosion since use is minimal, typically only a day or two, and the small number of vehicles that would be operating daily (up to four chippers and chipper trucks per day). Existing unpaved or gravel roadways are currently being used and the additional of the chipper vehicles would not increase the potential for erosion or loss of topsoil. No ground-disturbing activities or use of off-road vehicles would occur. Significant impacts related to erosion and loss of topsoil would not occur.

Greenhouse Gas Emissions		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would involve the use of a up to four crews operating a chipper and chipper truck each day along existing roadways. Use of these vehicles and equipment for chipping and vehicle travel to each residence to perform chipping activities would not generate greenhouse

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gas (GHG) emissions in significant quantities, due to the limited duration and types of activities. The project would result in the collection of cut vegetative material in communities that would otherwise be disposed of by individual landowner. One chipper truck can gather the equivalent of 17 full pickup truck loads of vegetative debris, thereby reducing truck trips and associated GHG emissions by increasing debris pickup efficiency. Significant GHG emission impacts would not occur.

Hazards and Hazardous Materials

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Risks of accidental spills of fuels or lubricants is minimal from use of the chipper and chipper truck at each residence and travel to and from residences. Trucks, vehicles, and equipment are used for ongoing management under existing conditions along Marin County roadways. Workers handling hazardous materials are required to adhere to OSHA and Cal/OSHA health and safety requirements to protect workers. The project does not involve any ground disturbance that could disturb listed hazardous waste sites. Significant impacts related to hazards and hazardous materials would not occur.

Hydrology and Water Quality

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project activities would be confined to existing public roads. Any leaks or spills associated with chipper and chipper truck use would be minimal and generally confined to existing paved and unimproved roadways. Significant water quality impacts would not occur.

Land Use and Planning

Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Implementation of the project would not involve any new development or changes to land uses that could physically divide a community. The project is consistent with the objectives of the Marin Wildfire Prevention Authority and the Marin County Community Wildfire Protection Plan (2020). All activities conducted would comply with local land use regulations and policies.

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Mineral Resources		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Chipping activities would not result in the loss of availability of a known mineral resource. Project vehicles and equipment would be confined to existing public roadways and would not alter land uses, access, or subsurface areas that could impact mineral resources.

Noise		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would involve use of a chipper and chipper truck that would generate noise. The proposed trailer-mounted chipper could produce peak noise levels of 74 to up to 83 dBA L_{eq} at 50 feet and more typical averaged noise levels of 47.5 to 57 dBA L_{eq} at 50 feet⁸. The chipper would be sited along public roads during chipping activities at residences that have signed-up for the chipper program for a few minutes at any one residence and a few hours within any one street or “neighborhood”. Noise levels would be similar to noise levels typical to neighborhood activities, including yard work and garbage collection. Chipper use would operate on weekdays from 8:00am to 5:00pm in accordance with the applicable local noise ordinances. Exceedances of local noise standards would not occur, and significant noise impacts would not occur.

Population and Housing		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Contractor crews operating the chippers and chipper trucks would be sourced from the existing businesses in the region. As such, this project would not induce population growth. No impact related to population and housing would occur.

⁸ Calculated from peak noise levels of 98.1 to 107.5 dBA $L_{eq, 30 \text{ sec}}$ and averaged noise levels of 71.9 to 81.1 dBA L_{eq} at approximately 3 feet away (operator distance; assuming trimmed and untrimmed wood typical of vegetation management activities) (Rottensteiner, Tsioras, Neumayer, & Stampfer, 2013; Brueck, 2008).

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Public Services		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would not directly or indirectly induce population growth. No new or altered governmental facilities would be needed to provide public services as a result of the project, and the project would not result in increased demand for public services. No impact related to public services would occur.

Recreation		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would occur within existing public roadways and would not affect recreational facilities. The project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

Transportation		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Up to five chipper and chipper truck crews would operate per day along public roadways in Marin County. The maximum of 30 daily one-way worker trips and 10 daily one-way chipper truck trips would not exceed screening threshold of 110 trips per day⁹. The VMT associated with implementation of the project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b).

Given the minimal number of vehicles that would operate per day associated with worker vehicles and chipper trucks, the addition of project vehicles on public roads would not impede traffic. As analyzed above, implementation of the project would minimize the number of truck trips associated with individual landowners conducting their own disposal

⁹ The Office of Planning and Research identifies a screening threshold for a small land-use project as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer than this threshold may be assumed to cause a less-than-significant transportation impact (OPR, 2017). Although a vegetation treatment project is not a land use project, it is assumed that the screening threshold would still apply to the project.

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as required by law, if the project were not implemented. The project may require partial lane closures while the chipper and chipper truck are parked at each residence to perform chipping activities. At least one lane of traffic would be open during project activities and a flagger would be on duty to maintain traffic flow and emergency access. Flagging and signage would be conducted in accordance with California Manual on Uniform Traffic Control Devices (MUTCD) when lane closures are required. Local access would be maintained at all times. No significant traffic impacts would occur.

Utilities and Service Systems		
Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project activities would not require use of water nor would the project generate wastewater. The project would not increase stormwater runoff. An estimated up to 300 cubic yards (420 tons) of vegetation material could be disposed of daily. Vegetative material processed by the chipper would be disposed at either the West Marin Compost, Marin Resource Recovery Center, Bolinas-Stinson Resource Recovery Project, or Redwood Landfill Inc., which together have a permitted capacity of over 4,950 tons per day and would be able to accept the chipped material (CalRecycle, 2021). No impact related to utilities and service systems would occur.

Wildfire		
Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Some of the chipping program areas are located in very high fire hazard severity zones or in the State Responsibility Areas (Marin County, 2021; CAL FIRE, 2007/2008). As discussed previously, emergency access would be maintained, and the project would not impair an adopted emergency response plan or evacuation plan. The project does not involve installation or maintenance of any infrastructure. The project does not involve ground disturbing activities or off-road vehicle use that could result in downslope or downstream flooding or landslides. The purpose of the project is to provide opportunities for reduction and disposal of hazardous vegetative buildup in defensible space around homes in Marin County, which would reduce the spread and intensity of a wildfire, should one occur. No impact related to wildfire would occur.

References

Balanay, J. A., Kearney, G. D., & Mannarino, A. J. (2016). Assessment of Occupational Noise Exposure among Groundskeepers in North Carolina Public Universities. *Environmental Health Insights*, 83-92.

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Figure 1 Chipper Program Areas

