

## Notice of Exemption

21-2021-232

To: Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

From (Public Agency):  
City of Novato  
922 Machin Avenue  
Novato, CA 94945

County Clerk County of: Marin  
Marin Civic Center  
3501 Civic Center Dr., Suite 234,  
San Rafael, CA 94903

FILED

NOV 02 2021

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

**Project Title:** Marin Valley Goat Grazing Evacuation Project

**Project Applicant:** City of Novato

**Project Location – Specific:** The Marin Valley Mobile Home Park (refer to Figure)

**Project Location – City:**  
Novato

**Project Location – County:**  
Marin County

### Description of Nature, Purpose and Beneficiaries of Project:

The purpose of the project is to provide defensible space around mobile home structures and improve evacuation and ingress/egress routes in the Marin Valley Mobile Home Park senior community. The project would involve building a more fire resilient and prepared community by establishing a buffer zone between structures and open space. Implementation of the project would reduce the potential for wildfires by reducing the fuel load and removing ladder fuels, and by providing improved access for emergency personnel in the event of an ignition. The project would be accomplished through goat grazing in areas around the mobile home park and manual and mechanical hand tools would be used for vegetation trimming and removal along roadways.

**Name of Public Agency Approving Project:** City of Novato

**Name of Person or Agency Carrying Out Project:** Novato Fire District

### 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: 15304(i). Minor alteration to land for fuel management activities.
- ☐ Statutory Exemptions. State code number: \_\_\_\_\_

### Reasons why project is exempt:

The project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 Minor Alterations to Land. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation that do

POSTED 11/2/21 TO 12/2/21

not involve the removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The project would involve vegetation reduction activities through the application of grazing goat on non-native grassland and oak woodland communities and minor mechanical and manual trimming of vegetation. The scope of the project is consistent with a minor alteration to the condition of the vegetation at the discrete prescribed herbivory sites and fire roads. 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:**


[Lynne Osgood]

**Area Code/Telephone/Extension:**

[415-878-2693]

**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: 11/2/21 Title: Daphne Fire Marshall

☒ Signed by Lead Agency

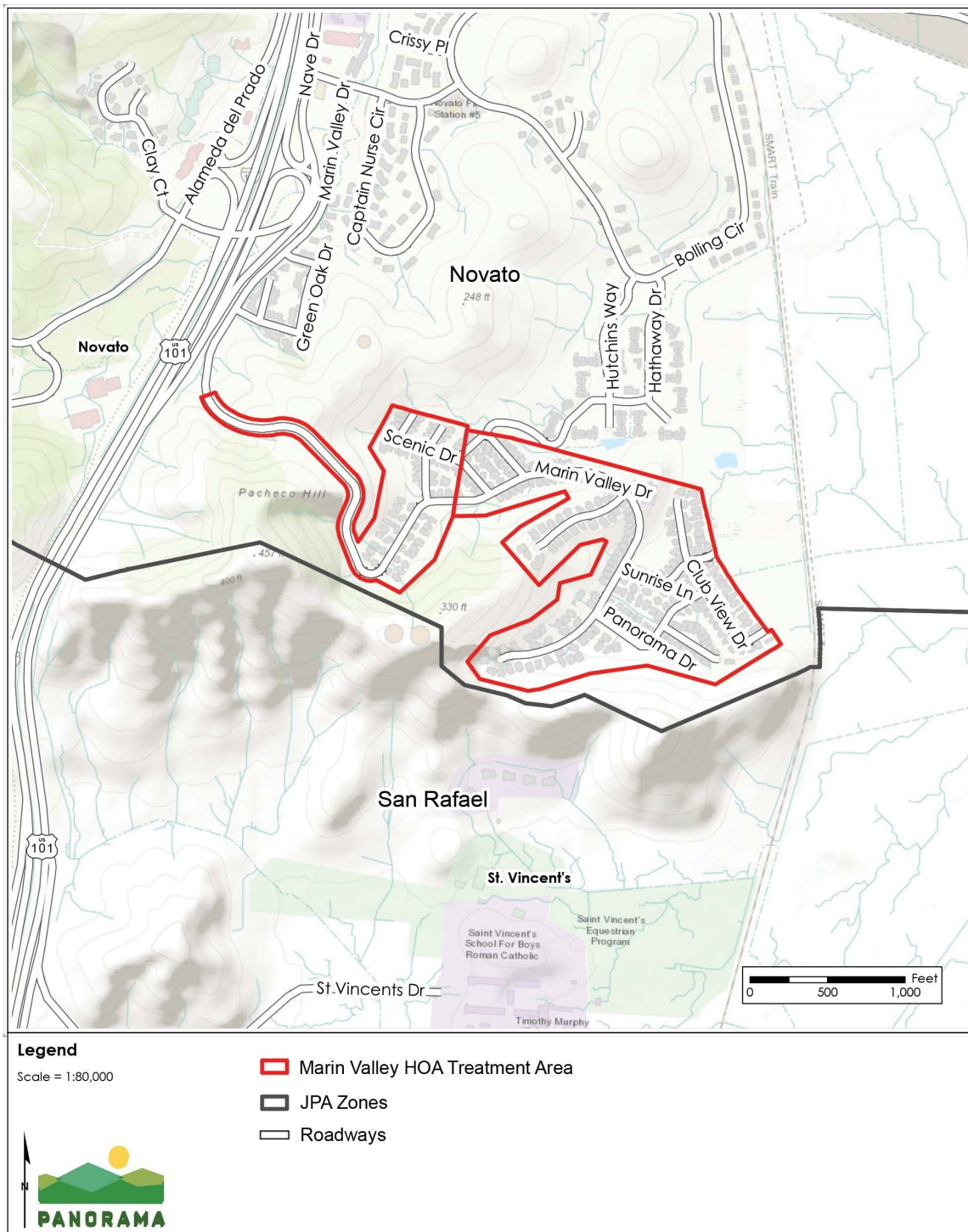
☐ Signed by Applicant

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 Project Location**



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

**Date:** September 16, 2021

**Project:** Marin Valley Goat Grazing Evacuation Project

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**Categorical Exemption Summary**

The Marin Wildfire Prevention Authority (MWPA) has determined that the Marin Valley Goat Grazing Evacuation Project (project) is categorically exempt under the California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 for Minor Alterations to Land. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The project would involve vegetation reduction activities through the application of grazing goats on non-native grassland and oak woodland communities and minor mechanical and manual trimming of vegetation. The scope of the project is consistent with a minor alteration to the condition of the vegetation at the discrete prescribed herbivory sites shown in Figure 1.

The following analysis demonstrates the project would not result in adverse environmental effects, supporting the MWPA's determination that the proposed activities are categorically 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, a discussion of why the potential exceptions to a categorical exemption do not apply here, and an assessment of the potential for environmental effects are provided below.

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**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 the 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.

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**Purpose and Need**

The purpose of the project is to provide defensible space around mobile home structures and to improve evacuation and ingress/egress routes in the Marin Valley Mobile Home Park

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senior community. The project would build a more fire resilient and prepared community by establishing a buffer zone between the structures and open space. Implementation of the project would reduce the potential for wildfires by reducing the fuel load and preventing laddering, and by providing improved access for emergency personnel in the event of an ignition.

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## **Project Description**

### **Treatment**

The project would treat vegetation within approximately 63 acres of the 100-acre Marin Valley Mobile Home Park property and within approximately 0.35 miles of fire roads, as shown in Figure 1. Grazing and hand crews have created defensible space zones around the mobile homes in previous years.

Approximately 313 habitable structures are in the project area and would benefit from the prescribed herbivory fuel reduction areas. Grazing would occur up to 100 feet from the mobile homes. Tree limbing and grass cutting would occur within 10 feet from roadways and for vertical clearance up to 14 feet to allow safe ingress and egress of emergency personnel and residents in an emergency. Treatments along roadways include the removal of invasive, non-native, and fire-hazardous vegetation and accumulated biomass. Goat grazing activities would occur in oak woodland and non-native grasslands. Grazing would not occur in areas where slopes exceed 50 percent. Herds would be excluded from roadways, seasonal streams when actively flowing, and riparian zones. No healthy, mature, scenic trees would be removed under this project.

### **Treatment Method**

Goat grazing involves transporting a herd of goats to the designated prescribed herbivory site. Site preparation would involve installation of a temporary fence and water trough. Water for the goat herds would be supplied via a hookup to the nearest water hydrant at each site. The goats would be contained by a portable, electric fence powered by a battery charged by a generator or other means on an as needed basis. The size of the area to be grazed by a herd at one time would be determined by the herder but typically ranges from 0.25 to 0.5 acres. Goats would be in one location for approximately 24 to 36 hours before being moved to a new location. The temporary fence would be moved daily by herders. Goat herds would be unloaded and loaded during business hours (between 8 a.m. and 5 p.m.).

Manual and mechanical hand tools would be used for vegetation trimming and removal along roadways. The equipment and tools that could be used include chainsaws, pole pruners, and broom pullers. A trailer-mounted chipper or similar chipper would be towed to work areas, depending upon site access. Access and staging would all occur from existing roads.

### **Disposal**

Vegetative debris from fire road treatment would be chipped on or off the work site and hauled away to a proper, local disposal facility. The facilities that may be used for disposal include Marin Resource Recovery, West Marin Compost, Redwood Landfill, or other suitable composting facility. It is anticipated that approximately 20 to 25 cubic yards of debris would be disposed of each workday.

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### Workers

A herd of goats is typically managed by one herder. The goat herd is comprised of between 100 to 400 individuals. At any one time, only one herd is anticipated at a single prescribed herbivory site. Approximately 2 to 3 work crews could conduct roadway treatments simultaneously in a day. A single contractor crew would consist of 3 to 6 workers.

### Site Access

Prescribed herbivory sites would be accessed using existing paved public and fire roads, and treatments along fire roads would be conducted entirely from existing roads. The defensible space and roadway treatments would be accessed from areas along Marin Valley Drive.

### Security and Monitoring

A goat herder would accompany each goat herd continuously to provide security and monitoring of the goats and temporary fence. The goat herder would live out of a trailer staged at a suitable nearby location, such as a parking lot or unimproved road.

### Schedule and Duration

All work would occur during weekdays between 8:00a.m. and 5:00p.m. Grass cutting 100 feet from structures and the fire road vegetation removal activities are anticipated to begin in September 2021. Goat grazing up to 100 feet from structures is anticipated to begin in June 2022 and occur for up to 2 weeks, depending on herd size and availability. After initial project implementation, maintenance along roadways and structures would occur annually.

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### Project Design and Implementation Features

The MWPA has developed specific design and implementation features adapted from several source documents referenced in parenthesis after each name that will be incorporated as applicable into the project design and implementation for each of its projects. Refer to the end of this document for citations to the documents the features were adapted from. The following specific design and implementation measures are part of the project:

#### CUL-1 Training<sup>1</sup>

For all activities with the potential for ground disturbance (excluding prescribed herbivory, vegetation and tree trimming, and hand pulling smaller vegetation) all contractors and crew will receive training prepared by and/or conducted by a qualified archaeologist (who meets the U.S. Secretary of Interior's professional standards set forth in 48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) prior to beginning work. The training will address the potential for exposing subsurface resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified including reporting the resource to a qualified archaeologist, and understanding all procedures required under

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<sup>1</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

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Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains.

### **CUL-2 Unanticipated Discovery<sup>1</sup>**

In the event that a previously unidentified cultural resource is discovered during implementation of an activity all work within a minimum of 150 feet of the discovery will be halted. The resource will be located, identified, and recorded in the MWPA cultural resources GIS database. Data regarding archaeological resources will be kept confidential per law, but may be shared with Native American tribes identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the project site, if archaeological in nature and if the tribe has requested that such information be shared with them.

The boundaries around the buffered resource will be temporarily marked, such as with fencing or flagging. A qualified archaeologist will inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort will be required. If the project proponent wishes to continue work in the area, only work performed using hand tools or powered hand tools is allowed, work cannot include ground disturbance below the topsoil layer, and the work area can only be accessed on foot as determined acceptable by the qualified cultural resource specialist/archaeologist.

Alternatively, the qualified archaeologist will evaluate the resource and determine whether it is:

- Eligible for the California Register of Historical Resources (CRHR) (and a historical resource for purposes of CEQA),
- A unique archaeological resource as defined by CEQA, and/or
- A potential tribal cultural resource (all archaeological resources could be a tribal cultural resource).

If the qualified archaeologist determines that the resource could be a tribal cultural resource, he or she will, within 48 hours of the discovery, notify each Native American tribe identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the project site of the discovery. A tribal monitor will inspect the resource to determine whether it constitutes a tribal cultural resource. If the resource is determined to be neither a unique archaeological, an historical resource, or a potential tribal cultural resource, work may commence in the area.

If the resource meets the criteria for either a historical resource, unique archaeological resource, and/or tribal cultural resource, work will remain halted in the buffered area around the resource. No work will occur within the buffered area except those methods previously discussed as determined acceptable by the qualified archaeologist and/or tribal monitor. After work is completed, all cultural resource delineators (e.g., flags or fencing) will be removed in order to avoid potential vandalism, unauthorized excavation(s), etc.

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### **CUL-3 Cultural Resource Investigation<sup>1,2</sup>**

Prior to implementation of vegetation management activities that have potential for intensive ground disturbance below the ground surface or use of heavy equipment off established roads and trails, a qualified archaeologist will conduct a records search and/or site-specific survey of the project areas where such disturbances could occur. Resources found during the records search and/or survey will be flagged for avoidance with an appropriate buffer identified by the qualified archaeologist, or the qualified archaeologist may identify modifications to the prescriptions using only hand tools or powered hand tools and access by foot with no ground disturbance, provided it would avoid all changes to the resources. Any resource found during the site survey will be documented on California State Department of Parks and Recreation cultural resource record forms and a survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures.

### **ET-1 Environmental Training for Biological Resources<sup>3,4</sup>**

All crew members and contractors will receive training from a qualified registered professional forester (RPF) or biologist prior to beginning a treatment project where sensitive biological resources could occur in the work areas. The training will describe the appropriate work practices necessary to effectively implement the appropriate project design and implementation features and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of potentially present special-status species with potential to occur; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; best management practices; and reporting requirements. As appropriate, the training will include protocols for work, such as specific trimming methods, where applicable. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF or biologist. The qualified RPF or biologist will immediately contact the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS), as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).

### **ES-1 Environmental Surveys for Rare Plants**

Within areas where rare and special-status plants have a high potential to occur, based on desktop data of habitat types, known site-specific information, and the professional judgement of qualified biologists, surveys will be conducted prior to any activity proposed to occur during the flowering season for the specific plant species that has the potential to damage the flowering body and seeds of these plant species. Activities that have the potential to damage the flowering body include but may not be limited to mowing, weed whacking, off-road vehicle and heavy equipment use, discing, and prescribed burning.

### **IP-1 Clean Equipment<sup>4,5</sup>**

All crew members, surveyors, and other personnel on site related to project activities will clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, known plant pathogens, or invasive wildlife.

### **IP-2 Prevent the Spread of Invasive Species and Plant Pathogens<sup>4,4</sup>**

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Segregate and treat soils and vegetation contaminated with invasive plant seeds and propagules. Treat, as appropriate, to prevent the spread of invasive plants. Treatment may include disposal on site within already infested areas, chipping or pile burning and mulching to eliminate viable seeds, or disposal at an approved cogeneration plant or green waste facility.

Minimize soil disturbance to the greatest extent possible to reduce the potential for introducing or spreading invasive plants or plant pathogens, to protect topsoil resources, and to reduce available habitat for the establishment of new invasive plants.

### **IP-3 Treat Invasive Plants Prior to Seeding<sup>4,4</sup>**

Schedule activities to maximize the effectiveness of control efforts and minimize introduction and spread of invasive plants as feasible, with consideration for project objectives and location (e.g., install and maintain fuel breaks, disc lines, and other work before non-native plants set seeds).

### **IP-4 Retain Native Plants<sup>4,4</sup>**

When removing vegetation, focus first on removing invasive and highly flammable species, and dead or diseased vegetation. Retain beneficial, low-fire risk native plant species whenever possible.

### **GEO-1 Erosion and Soils Loss Stabilization Measures<sup>2</sup>**

Soils will be stabilized if a vegetation management activity may leave less than 70 percent groundcover or native mulch/organic material.

For areas between 50 percent and 70 percent ground cover left:

- Sow native grasses and other suitable native vegetation on denuded areas where natural colonization or other replanting will not occur rapidly; use slash or chips to prevent erosion on such areas.
  - Use surface mounds, depressions, logs, rocks, trees and stumps, slash and brush, the litter layer, and native herbaceous vegetation downslope of denuded areas to reduce sedimentation and erosion, as necessary to prevent erosion or slope destabilization.
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<sup>2</sup> Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

<sup>3</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018.

<sup>4</sup> Adapted from measures in the Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>5</sup> Adapted from measures in the Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

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- Install approved, biodegradable erosion-control measures and non-filament-based geotextiles (e.g., coir, jute) when:
    - Conducting substantial ground-disturbing work (e.g., use of heavy equipment, pulling large vegetation) within 100 feet and upslope of currently flowing or wet wetlands, streams, lakes, and riparian areas;
    - Causing soil disturbance on moderate to steep (10 percent slope and greater) slopes; and
    - Removing invasive plants from stream banks to prevent sediment movement into watercourses and to protect bank stability.
  - Sediment-control devices, if installed, will be certified weed-free, as appropriate. Sediment control devices will be inspected daily during active work to ensure that they are repaired and working as needed to prevent sediment transport into the waterbodies.

For areas with less than 50 percent ground cover:

- Any of the above measures
- Stabilize with mulch or equivalent immediately after project activities, to the maximum extent practicable.
- If project activities could result in substantial sediment discharge from soil disturbance, as determined by the qualified personnel (e.g., RPF), organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion.
- Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface.

Once work is completed, the areas will be inspected at least annually if accessible, until groundcover exceeds 70 percent or slopes have stabilized, as determined by a qualified professional. At that time, erosion-control and slope-stability devices may be removed.

### **HAZ-1 Leak Prevention and Spill Cleanup<sup>1,4</sup>**

The project proponent will, at a minimum, implement measures that address the following procedures related to the use of hazardous materials during work:

- Proper disposal or management of contaminated soils and materials (i.e., clean up materials)
  - Daily inspection of vehicles and equipment for leaks and spill containment procedures
  - Emergency response and reporting procedures to address hazardous material releases
  - Emergency spill supplies and equipment will be available to respond in a timely manner if an incident should occur
  - Response materials such as oil-absorbent material, tarps, and storage drums will be available in the plan area at all times during management activities and will be used as needed to contain and control any minor releases
  - The absorbent material will be removed promptly and disposed of properly
  - Use of secondary containment and spill rags when fueling
  - Discourage “topping-off” fuel tanks
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- Workers using fuels or other hazardous materials must be knowledgeable of the specific procedures necessary for hazardous materials cleanup and emergency response
  - All diesel and gasoline powered equipment will be maintained per manufacturer's specification, and in compliance with all state and federal emission requirements

### **HAZ-2 Wildfire Risk Reduction<sup>1,3,4</sup>**

The following measures will be implemented during activities that involve the use of equipment that can generate sparks or heat:

- Maintain fire suppression equipment (e.g., shovel, extinguisher) in work vehicles and ensure workers are trained in use
- Closely monitor for ignited vegetation from equipment and tool use
- Train workers to properly handle and store flammable materials to minimize potential ignition sources
- Prohibit smoking in vegetated areas
- Avoid use of spark- and/or heat-generating equipment during high fire danger days (e.g., Red Flag Days and Fire Weather Watch)
- Outfit off-road diesel vehicles and equipment with spark arrestors
- Avoid metal string or blade weed trimmers
- Maintain one fire extinguisher for each chainsaw

### **NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors<sup>4,6</sup>**

All projects will comply with applicable local noise ordinances. All powered equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.

Measures to minimize noise disruption to nearby neighbors and sensitive receptors will be implemented as needed. These measures may include but are not limited to:

- Using noise control technologies on equipment (e.g., mufflers, ducts, and acoustically attenuating shields)
  - Locating stationary noise sources (e.g., pumps and generators) away from sensitive receptors.
  - Close engine shrouds during equipment operations
  - Shut down equipment when not in use. Equipment will not be idled unnecessarily.
  - Operate heavy equipment during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship).
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<sup>6</sup> San Francisco Public Utilities Commission (SFPUC), Standard Construction Measures, July 2015.

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- Locate project activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible

### **NSO-1 Northern Spotted Owl Nesting Season Avoidance<sup>1</sup>**

Each project will be reviewed by a qualified biologist to determine if northern spotted owls have potential to occur near proposed project activities. Within areas where northern spotted owl have the potential to occur, work, including mowing with heavy equipment, the mechanical removal of vegetation, or prescribed burning, including pile and broadcast burning, will occur outside of the northern spotted owl nesting season to the extent feasible (February 1 to July 31).

If work must occur during the northern spotted owl nesting season, either NSO-2 or NSO-3 will apply.

### **NSO-2 Work During Northern Spotted Owl Nesting Season – Surveys<sup>1</sup>**

Within an area where northern spotted owl has the potential to occur, when work will occur during the northern spotted owl nesting season (February 1 through July 31), and work is not considered low-impact by a qualified biologist the following measure will apply. (Low impact type activities include, but are not limited to, goat grazing, hand pulling of weeds, hand trimming of trees and vegetation with non-mechanized equipment, chipping from existing roadways in residential areas, and use of mechanized equipment adjacent to roads or in residential areas that is a typical noise for the environment. In contrast, high-impact activities may include operation of heavy machinery in wildlands with lower baseline environmental noise, or work which produces noise disturbance for a longer duration than is typical in the environment.)

The biologist will determine if a known breeding pair is found within 0.25 mile of the proposed activity (i.e., from existing surveys that season or historical data) and perform a nest check to confirm presence. If no survey data for the season has been completed for the areas and no historic data is available, two surveys will be conducted by a qualified biologist (whose qualifications have been approved by the MWPA or lead public agency) for nesting northern spotted owls during the months of April and May preceding the commencement of these activities. At a minimum, the survey area will include all suitable nesting habitats within 0.25 mile of any planned activity sites, and then one of the two options listed below will be implemented. If access cannot be secured for surveys, then work should be delayed until after the nesting season, unless it can be shown that noise generation from the activities and the activities proposed would be below noise and visual disturbance levels for northern spotted owls (refer to USFWS Revised Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California) at the nest site, if known.

1. If it is conclusively determined that there are nesting northern spotted owls, planned activities that generate noise (e.g., mowing, heavy equipment usage, crews with hand tools that generate noise) in areas without regular human disturbances from human residency (e.g., leaf blowers, home construction and remodeling, roadways), that are within 0.25-mile of an identified active nest will not begin prior to September 1 unless the young have fledged, at which time work may begin no earlier than July 10. Prescribed burns may only occur within suitable northern spotted owl habitat (as determined by a qualified
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biologist) during the nesting season if protocol surveys have determined that northern spotted owl nesting is not occurring in the area of planned activity.

2. If work must occur within 0.25 mile, and work has been determined to have the potential to impact an active northern spotted owl nest, CDFW and USFWS would be consulted to determine if take could occur and whether further permits are required.

### **NSO-3 Northern Spotted Owl Habitat Alteration<sup>1</sup>**

For projects involving removal of large trees (10-inches diameter at breast height (DBH) or greater) in potential northern spotted owl roosting, or nesting habitat (as identified during the desktop review) in areas without regular human disturbances from human residency, habitat alteration within core use areas (nesting and roosting habitat) will be planned in consultation with a qualified northern spotted owl biologist.

### **NSO-4 Retain Dusky-footed Woodrat Nests<sup>1</sup>**Error! Bookmark not defined.

Dusky-footed woodrats are important prey for northern spotted owls. Wherever feasible, project activities will leave dusky-footed wood rat nests intact. If possible, maintain a 3-foot buffer of vegetation around dusky-footed woodrat middens.

### **NB-1 Nesting Bird Season Avoidance<sup>1,4</sup>**Error! Bookmark not defined.,<sup>7</sup>

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through July 31<sup>st</sup> <sup>8</sup>. Not all species nest between the regulatory season, and active nests that are encountered year-round are protected.

### **NB-2 Nesting Bird Surveys<sup>1,4</sup>**Error! Bookmark not defined.

If work that has the potential to impact nesting birds commences between February 1 and July 31 (during the nesting season), a qualified biologist (whose qualifications have been approved by the MWPA or lead public agency) will conduct a pre-activity survey for nesting birds.

Nesting bird surveys are recommended during the nesting season for work involving mowing with heavy equipment, other vegetation (including tree) removal or limbing and trimming activities, and prescribed (broadcast and pile) burning. Low-impact activities including goat grazing, hand-pulling weeds, and herbicide application do not generally require nesting bird surveys. Determination of need for surveys for low-impact activities should be evaluated on a case-by-case basis in consultation with a qualified biologist or RPF.

Nesting bird surveys will occur within no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7 days, a follow-up survey will be conducted prior to the restarting of work. Appropriate survey

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<sup>7</sup> Marin County Parks (MCP), Bird Nesting Survey Training Manual, 2017.

<sup>8</sup> Note that the general nesting season between February 1 and July 31 is a guideline, and that birds may begin nesting beforehand, and complete nesting after these dates. Regardless, active nests are protected year-round. Avian nesting season may begin as early as January 1.

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areas will be determined by the qualified biologist depending on the project footprint, type of activity proposed, and suitable habitat for nesting birds. Surveys will be conducted during periods of high bird activity (i.e., 1-3 hours after sunrise and 1-3 hours before sunset). If the qualified biologist determines that visibility is significantly obstructed due to on-site conditions (such as access issues, rain, fog, smoke, or sound disturbance [including high wind]), surveys will be deferred until conditions are suitable for nest detection.

### **NB-3 Nesting Birds: Active Nest Avoidance**<sup>1,4,Error! Bookmark not defined.,10</sup>

If active nests (i.e., presence of eggs and/or chicks) are observed in areas that could be directly or indirectly disturbed (including noise disturbance), a temporary, species-appropriate no-disturbance buffer zone will be created around the nest sufficient to reasonably expect that breeding would not be disrupted. No work will occur inside the buffer zone.

The size of the buffer zone will be determined by the biologist, by taking into account factors including but not limited to the following:

- Noise and human disturbance levels at the site at the time of the survey and the noise and disturbance expected during the work;
- Distance and amount of vegetation or other screening between the site and the nest; and
- Sensitivity of individual nesting species and behaviors of the nesting birds, taking into account factors such as topography, visibility to source of disturbance, noise/vibration, nesting phase, and other case-by-case specifics.

Buffer sizes may be altered during the course of work at the recommendation of the biologist. Raptor nests are subject to additional protections, including during the “branching” phase, when fledglings begin to fly but do not fully leave the nest. Buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified biologist.

If work must occur within the buffer, proceed to NB-4. NB-4 Nesting Birds - Active Nest Monitoring<sup>Error! Bookmark not defined.,8,1,4</sup>

### **NB-4 Nesting Birds - Active Nest Monitoring**<sup>1,4,Error! Bookmark not defined.,10</sup>

If an avoidance buffer is not achievable, a qualified biologist may monitor the nest(s) during work activities within the recommended nest buffer to document that no take of the nest (nest failure) has occurred related to work activities. If it is determined that work activity is resulting in nest disturbance, work should cease immediately.

### **RB-1 Pework Survey**<sup>3,4</sup>

If vegetation management activities would (1) occur in trees with potential for roosting bat species, (2) would include removal or trimming of trees where a bat could be roosting, or (3) would involve removal or trimming of a tree with mechanized equipment adjacent to trees or structures that could have roosting bats and (4) the work would commence between March 1 and July 31, during the bat maternity period, a pre-activity survey will be conducted for roosting bats within 2 weeks prior to work to ensure that no roosting bats will be disturbed during work. This survey can be conducted concurrent with other surveys for other sensitive species. Trees and shrubs within the work footprint that have been determined to be unoccupied by roosting bats, or that are located outside the avoidance buffer for active roosting sites may be removed. Roosting initiated during work is presumed to be unaffected, and no buffer would be necessary.

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### **RB-2 Avoidance of Maternity Roosts and Day Roosts<sup>3</sup>**

If active maternity roosts or day roosts are found within the project site, or in areas subject to disturbance from work activities, avoidance buffers will be implemented. The buffer size will be determined in consultation with the qualified biologist or RPF.

### **RB-3 Bat Roosting Tree Removal – Seasonal Restrictions<sup>3</sup>**

Removal of trees identified as providing suitable roosting habitat should be conducted during seasonal periods of bat activity, including:

- Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than ½ inch of rainfall within 24 hours occurs; or
- Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than ½ inch of rainfall within 24 hours occurs.

If it is determined that a colonial maternity roost is potentially present, the roost will be avoided and will not be removed during the breeding season (April 15 to August 31) unless removal is necessary to address an imminent safety hazard.

Operation of mechanical equipment producing high noise levels (e.g., chainsaws, heavy equipment) in proximity to buildings/structures supporting or potentially supporting a colonial bat roost will be restricted to periods of seasonal bat activity (as defined above), when possible.

### **RB-4 Bat Roosting Tree Removal – Emergency Removals<sup>3</sup>**

Potential non-colonial roosts that cannot be avoided will be removed on warm days in late morning to afternoon when any bats present are likely to be warm and able to fly. Appropriate methods will be used to minimize the potential of harm to bats during tree removal. Such methods may include using a two-step tree removal process. This method is conducted over two consecutive days, and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on Day 1. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed, to not return to the roost that night. The remainder of the tree is removed on Day 2.

### **RR-1 Riparian Resources – Project Design<sup>4,4</sup>**

In riparian areas, treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are representative of healthy stands of the riparian vegetation types that are characteristic of the region. Allowable activities include hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. Mature, healthy trees will not be removed from a riparian corridor. Any activities conducted within a riparian corridor will be conducted so as to avoid alteration to a bed, channel, or bank of a waterway and all debris, including sawdust, chips, or other vegetative material, will be prevented from entering the bed, channel, or bank of a waterway, unless a permit from the California Department of Fish and Game under Section 1600 is obtained.

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Avoid grazing across waterways and within a 50 foot buffer if there is a need for protection of riparian vegetation from grazing. Limited grazing may be allowed if it would be beneficial to plant communities without causing harm (e.g., removal of invasive species) and would not result in erosion.

### TR-1 Emergency Access to Project Areas<sup>1,2</sup>

The following measures will be implemented to maintain emergency access:

- At least one week prior to temporary lane or full closure of a public road for vegetation management-related work, the appropriate emergency response agency/agencies will be contacted with jurisdiction to ensure that each agency is notified of the closure and any temporary detours in advance and obtain all required encroachment permits
- In the event of any emergency, roads blocked or obstructed for maintenance activities will be cleared to allow the vehicles to pass.
- During temporary lane or road closures on public roads, flaggers equipped with two-way radios will be utilized where needed to control traffic. During an emergency, flaggers will radio to the crew to cease operations and reopen the public road to emergency vehicles.
- All authorized vehicles at the treatment site will be parked to not block roads when no operator is present to move the vehicle.

### TR-2 Traffic Control Measures<sup>3</sup>

Traffic control measures will be implemented to maintain traffic and pedestrian circulation on streets affected by project activities. The following measures may include:

- All traffic control devices will conform to the latest edition of the MUTCD, and as amended by the latest edition of the MUTCD California supplement.
- Any work that disturbs normal traffic signal operations and ensure proper temporary traffic control (lane shifts, lane closures, detours etc.) will be coordinated with the agency having jurisdiction, at least 72 hours prior to commencing work.
- Flaggers and/or warning signage of work ahead.
- A minimum of twelve (12) foot travel lanes on public roads must be maintained unless otherwise approved.
- Maintaining access to driveways and private roads at all times unless other arrangements have been made.
- Traffic control devices will be removed from view or covered when not in use.
- Sidewalks for pedestrians will remain open if safe for pedestrians. Alternate routes and signing will be provided if pedestrian routes are to be closed.
- Scheduling truck trips during non-peak hours to the extent feasible.

### Discussion of Exceptions (Section 15300.2)

**(a) Location:** Sensitive habitats, including watercourses and wetlands areas would be avoided. Riparian woodlands may be encountered but any vegetation trimming, or thinning, would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (RR-1). Due to the scope and design of the project, the project would not adversely affect riparian habitats as the work would not affect shade or

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species diversity and could be beneficial if invasive species removal is needed, therefore, exception (a) does not apply.

**(b) Cumulative Impact:** Ongoing maintenance of the roadside vegetation along the project roadways and grazing activities would be limited to the types of activities previously described, which would be performed periodically to maintain fuel reduction areas to help slow or stop the spread of wildfire and provide safe access for emergency responders. The visual character of project work areas would be modified each time vegetation treatments are implemented, due to reduction in vegetation cover and type (e.g., broom removal), but the overall natural character would remain, and the treatments are not considered a visual degradation. The design and implementation of this project ensures that significant effects on environmental resources are avoided over successive years of maintenance. As such, the project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

**(c) Significant Effects due to “Unusual Circumstances”:** The proposed grazing and vegetation thinning activities are considered routine and are prevalent and typical throughout the County and Bay area region. Sensitive waterways and special-status species would be avoided. The project would modify the vegetation, but the overall natural character would remain, and the aesthetic change would not be substantial or adverse. 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:** No designated California State Scenic Highways occur in the vicinity of the prescribed herbivory sites; therefore, exception (d) does not apply (Caltrans, 2021).

**(e) Hazardous Waste Sites:** Per the current government database of hazardous waste sites at the time of this filing, the prescribed herbivory sites and fire roads do not occur on any listed hazardous waste sites; therefore, exception (e) does not apply (SWRCB, 2021).

**(f) Historical Resources:** The prescribed herbivory activities would not cause any ground-disturbing activities, would not alter any built environment features, and would not cause a substantial adverse change in the significance of a known or previously undiscovered historical resource. Fire road treatments would not cause any intense ground-disturbing activities and work would occur within 10 feet of the road edge. Some hand pulling of invasive plants could occur. As part of the project, workers would participate in a cultural training prior to project implementation (CUL-1), a records search would be conducted prior to work in order to identify areas of avoidance, and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource would be fully avoided (CUL-4).

### 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"/>

Visual impacts from grazing would include the temporary presence of livestock, temporary fencing, water troughs, and any visual changes in vegetation appearance associated with the post-grazed area. Goats would be in any one area within a prescribed herbivory site for up to

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approximately a day and a half. Presence of goats in the Marin Valley Mobile Home Park would not have a significant visual impact due to the limited area of grazing, duration, and the low visual intrusiveness of the animals. Degradative visual change would be considered low as viewers perceive their presence as temporary. Grazing would primarily reduce the height and density of vegetation for the season, which is in character with a residential area.

Equipment and trucks performing the work would be temporarily visible along these roadways. The roadways vegetation thinning activities would be on one roadway for a short period of time (a few hours to a day). Vegetation thinning activities would be performed in limited areas along the specified fire roads (Figure 1) within the Marin Valley Mobile Home Park at any given time. Vehicles are common in the area. Visual character would not be significantly degraded.

Minor changes to the vegetation patterns and form would occur from manual and mechanical removal of fire-hazardous vegetation and invasive, non-native vegetation within 10 feet of the fire roads. No healthy, mature, scenic trees would be removed as part of this project. The vegetative material would be chipped and hauled away from the work area. Viewers in the immediate vicinity may notice changes in the density and type of vegetation along the roadways. These methods of fire road thinning currently occur in the Novato Zone as well as throughout the broader Marin County to maintain emergency vehicle access. Views in the immediate foreground are also dominated by the graded fire road itself and vegetation thinning along the edges of roadways would not be considered significant visual degradation. This type of work and vegetation management is typical of the area and a characteristic part of the existing environment. The project would not degrade Marin Valley Mobile Home Park residents' views because the visual change would be minimal, is typical in the area, and would extend only out to 10 feet from the roadway. The dominant vegetation and characteristic of the area around the fire roads would remain. Significant adverse effects to aesthetics would not occur.

Agriculture and Forestry 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 proposed roadside vegetation thinning activities would not convert designated farmland to non-agricultural uses, as the area is not in agricultural use. Healthy, mature trees would not be removed 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"/>

Vehicles and equipment for the fire road vegetation thinning activities and to transmit and monitor the goat herds would emit diesel particulate matter and criteria air pollutants. The grazing goats would not adversely affect air quality. For the fire road vegetation thinning activities, it is assumed that worker trucks, mechanical hand tools, and a chipper would

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operate for a few hours per crew and one off-haul truck would travel to a green waste disposal center per day. 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"/>

Biological database searches for the vicinity of the fire roads were conducted (CDFW, 2021; CNPS, 2021). Of the species identified during the database search, species were determined to have potential to occur within the work areas if the species is known to occur in the vicinity of the sites and if the sites or immediate vicinity contains suitable habitat to support these species.

### Special-Status Plants and Sensitive Vegetation Communities

Riparian, wetland, or other sensitive habitats may occur along or near the Marin Valley Mobile Home Park. Some plant species have a moderate or high potential to occur within the work areas (Figure 2). Goats can graze scrub to a height of approximately 2 inches and could crush sensitive plant species by trampling (Magnificent Meadows, n.d.). The degree to which livestock grazing is considered to be similar to prehistoric and historic, native grazing varies depending upon the study and the level of effects on native plant species depends upon the frequency and intensity. Goat grazing, with proper management, can reduce shrubland encroachment into grasslands, as goats preferentially consume shrubs, and has been found to improve diversity and density of species compared to ungrazed areas (Huntsinger, Bartolome, & D'Antonio, 2015). Generally, grazing impacts from this project would be minimal as the goats would be in a single area for up to approximately 36 hours, minimizing potential for trampling; therefore, species that are adapted to occasional grazing influences would not be impacted. For the plant species with a moderate potential to occur, the grazing sites are relatively small in comparison to the known populations of the species and due to the temporary nature of the proposed goat grazing, it is not anticipated that the proposed grazing could impact the plant populations.

Vegetation trimming and removal would be conducted by hand to remove fuel loading and allow safe ingress and egress (RR-1). Workers would receive training from a qualified professional prior to beginning the vegetation treatments in areas where sensitive biological resources could occur. Training would include identification of special-status plant species and sensitive communities for avoidance or, as appropriate, training for species-specific protocols for work, such as trimming methods (ET-1). The training for this project would involve identification of Tiburon buckwheat, congested-headed hayfield tarplant, and Mt. Tamalpais bristly jewelflower for avoidance if encountered along the work areas. Where rare plants have a high potential to occur based on a review and professional judgement and activities that could damage the flowering plant species would occur during the blooming season, surveys would be conducted prior to work (ES-1). The vegetation trimming and removal would generally focus on removing invasive and fire-hazardous species, leaving native species in place (IP-4), and the types of activities described generally would not disrupt the seed banks of these species, important for their re-emergence in future years. Workers would clean equipment and handle vegetation to avoid spreading invasive species and plant pathogens (IP-1, IP-2, IP-3). None of the sensitive plant species would be significantly impacted by roadside vegetation removal and goat grazing activities, as shown

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in Table 1. Significant impacts on native vegetation communities and special-status plant species would not occur.

### Special-Status Wildlife

Some wildlife species have a moderate potential to occur within the work areas (refer to Figure 3 for locations on known occurrences in relation to the project). Project activities would generally be conducted August 1 to January 31, avoiding nesting birds and roosting bats. If activities must occur from February 1 to July 31, appropriate nesting bird and/or bat surveys would be conducted (NSO-1, NSO-2, NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4). Training would include identification for avoidance of sensitive communities where sensitive wildlife could occur, such as wetlands.

The western pond turtle has a moderate potential to occur within the project area. Suitable habitat for the western pond turtle may be present in the freshwater ponds north of the project area, and the work area may serve as suitable upland habitat. All streams, ponds, and wetlands found within or adjacent to the work areas would be avoided. Training would also identify habitat for the western pond turtle for avoidance (ET-1).

The burrowing owl has a moderate potential to occur within the project area. Grassland habitat surrounding the Marin Valley Mobile Home Park may serve as suitable habitat for the burrowing owls. The goat grazing and fire road vegetation removal activities would not cause any intense ground-disturbing activities that would affect burrowing owl burrows. As stated previously, project activities would primarily occur outside of the nesting bird season (February 1 through July 31<sup>st</sup>). If project activities would occur between February 1<sup>st</sup> and July 31<sup>st</sup>, a pre-activity survey would be conducted for nesting birds (NB-2). A buffer zone would be created around any active nests in the project area so breeding would not be disturbed (NB-3). If an avoidance buffer is not possible, nests would be monitored by a qualified biologist to ensure no nest failure would occur from project activities (NB-3).

### Northern Spotted Owl

Northern spotted owl has low potential to occur, but given the concern over the species, it is discussed here. Critical habitat for the northern spotted owl is more than 3 miles from the Marin Valley Mobile Home Park (USFS, 2021) (Locations of known occurrences in relation to the project were reviewed but Figure 4 was omitted from this document in order to protect northern spotted owl nest locations). Treatment would occur within 10 feet of roadways and 100 feet of the occupied structures. Due to the sensitivity to human presence, northern spotted owls are less likely to nest within the work areas as these areas are directly adjacent to the Marin Valley Mobile Home Park. As stated previously, vegetation treatment activities would occur outside of the northern spotted owl nesting season to the extent possible (NSO-1). If any large trees 10 inches DBH or greater are identified as hazard trees, a qualified northern spotted owl biologist would be consulted (NSO-3). Dusky-footed wood rat nests would be left intact wherever feasible (NSO-4). Given the work would be focused on removal of hazardous fuels near structures and roadways, the work would not be considered major habitat alteration for northern spotted owls. Significant impacts on special-status wildlife species would not occur.

### Wetlands

Seasonal streams and freshwater emergent wetlands intersect or occur adjacent to the work areas as shown in 5 (USFWS, 2021). Streams and wetlands would be avoided by project activities. Due to the extent of vegetation treatment activities out to typically 10 feet from roadways, wetlands are not anticipated to be encountered and no activities would occur in

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wetlands. Fencing would be established to exclude goats from streams with actively flowing water and wetlands. Goats would be in one discrete area for up to approximately 36 hours, which would not be long enough to establish bare areas of soil or trample wetland communities, if present. Training would ensure that workers avoid wetlands (ET-1). Significant impacts on wetlands would not occur.

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**Table 1 Special-Status Species with Potential to Occur in the Project Vicinity**

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<b>Sensitive Plants</b>					
<i>Chloropyron maritimum ssp. palustre</i>	Point Reyes salty bird's-beak	CNPS 1B.2	Coastal salt marsh	None - no suitable habitat in project area	None
<i>Eriogonum luteolum var. caninum</i>	Tiburon buckwheat	CNPS 1B.2	Chaparral, Coastal Prairie, Valley Grassland	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	None with implementation of environmental training, or surveys and avoidance if work is in blooming season
<i>Hemizonia congesta ssp. congesta</i>	congested-headed hayfield tarplant	CNPS 1B.2	Northern Coastal Scrub, Valley Grassland	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	None with implementation of environmental training, or surveys and avoidance if work is in blooming season
<i>Polygonum marinense</i>	Marin knotweed	CNPS 3.1	Coastal salt, brackish marshes, swamps	None - No suitable habitat within the project area	None
<i>Streptanthus glandulosus ssp. pulchellus</i>	Mt. Tamalpais bristly jewelflower	CNPS 1B.2	Chaparral, Valley Grassland	Moderate - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	None with implementation of environmental training, , or surveys and avoidance if work is in blooming season
<b>Sensitive Wildlife</b>					
<i>Antrozous pallidus</i>	pallid bat	SSC	Roosts in large diameter trees and abandoned buildings	Low - suitable roosting habitat not likely in project area	None with implementation of Bat Project Design Features

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Athene cunicularia</i>	burrowing owl	SSC	Nests in grassland burrows, with preference towards flat areas or bowls at the base of canyons	Moderate - Suitable habitat is present in the grassland habitat surrounding the mobile home park.	None with implementation of nesting bird Project Design features
<i>Charadrius nivosus nivosus</i>	western snowy plover	FT, SSC	Nests in coastal dunes	None, no suitable habitat included in project area	None
<i>Emys marmorata</i>	western pond turtle	SSC	Freshwater ponds and streams	Moderate - Ponds mapped north of the project area may be suitable habitat for western pond turtle, and the work area may provide upland habitat	None with implementation of environmental training and avoidance
<i>Laterallus jamaicensis coturniculus</i>	California black rail	FT, FP	Wetlands and marshes	None - project area not within suitable habitat	None
<i>Melospiza melodia samuelis</i>	San Pablo song sparrow	SSC	Marshes and wetland edges	None - project area not within suitable habitat	None
<i>Rallus obsoletus obsoletus</i>	California Ridgway's rail	FE, CE, FP	Wetlands and marshes	None - project area not within suitable habitat	None
<i>Rana boylei</i>	foothill yellow-legged frog	CE, SSC	Rocky streams in a variety of habitats, including habitats such as valley foothill hardwood, valley-foothill riparian, coastal scrub, mixed conifer, mixed chaparral, and wet meadows	Low - the single CNDDB occurrence in the vicinity of the work was documented in 1947 and is described as "possibly extirpated". However, the project area appears to be adjacent to a wetland/pond habitat system which has the potential to provide marginal breeding habitat for FYLF.	None with implementation of environmental training and avoidance of ground disturbance in riparian or wetland areas.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Reithrodontomys raviventris</i>	salt-marsh harvest mouse	FE, CE, FP	Marshes and wetland edges	None - project area not within suitable habitat	None
<i>Spirinchus thaleichthys</i>	longfin smelt	FC, CT	Fully aquatic	None - project area not within suitable habitat	None
<i>Strix occidentalis caurina</i>	Northern spotted owl	FT, CT	Forest with high canopy and open understory for foraging	Low - Activity centers are present in the vicinity of the work area, but no suitable nesting habitat is present within 0.25 miles of the work area.	None with implementation of Northern Spotted Owl BMPs
Notes: Species with occurrences within 3 miles of project areas were examined. Species which are considered "extirpated" or those with occurrence data greater than 75 years old were removed from the analysis as they are not anticipated to occur in the vicinity of the work area. Species with occurrence data which was greater than 50 years old was examined for inclusion on a case-by-case basis.					
FE	Federally Endangered		CT	California State Threatened	
FT	Federally Threatened		CC	California State Candidate	
FC	Federal Candidate		FP	Fully Protected	
CE	California State Endangered		SSC	California State Species of Special Concern	

Source: (CDFW, 2021; CNPS, 2021; CDFG, 2003; Hickman, 1993; Stebbins, 2003)

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Cultural Resources and Tribal Cultural Resources <sup>9</sup>		
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"/>

Grazing would have minimal ground disturbance other than staking of temporary fencing and of disturbance of topsoil from animal tracks but could result in some compaction of soil. Surface and subsurface archaeological deposits would not likely be impacted by grazing. While animals could churn up some soils containing resources, grazing animals do not have enough directed force to significantly damage resources.

Equipment and vehicles for roadside vegetation thinning activities would operate from existing roadways. No intense ground disturbing activities would occur (e.g., off-road equipment use, discing). While some hand pulling of invasive species may occur, the potential to disturb cultural resources is generally low since this work results in little ground disturbance and does not involve the use of heavy equipment that could damage resources. Workers would participate in a cultural training prior to project implementation (CUL-1), and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided (CUL-2). A cultural resources records and/or site-specific survey of project areas that could involve ground disturbance, such as areas of extensive broom pulling, would be conducted prior to the disturbance and any identified resource areas would be flagged for avoidance (CUL-3) or limited prescriptions that avoid affects such as only allowing hand tools in the area would be defined. Significant impacts on cultural resources and human remains 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 used to conduct the roadside vegetation thinning activities and grazing operations would consume energy, including gas, diesel, and motor oil. Vehicle engines and fuel used during implementation of the project would comply with State and local energy reduction and efficiency requirements. The use of fuel to implement the project would be minimal and the proposed fuel consumption would, additionally, be considered beneficial and not wasteful given the positive outcome of the work to create defensible space around the Marin Valley Mobile Home Park community and to improve routes for emergency vehicle access during a wildfire. Implementation of goat grazing, and roadside vegetation thinning

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<sup>9</sup> 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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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 paved roads. Soil erosion and loss of topsoil could occur during manual and mechanical vegetation cutting and removal through the exposure of bare soils. After the vegetation thinning is completed, erosion and topsoil loss could occur through loss of root-soil matrix strength if root systems die. Root systems of larger vegetation would generally be left in place, minimizing the potential for erosion. Vegetation removal and cutting that maintain at least 70 percent of groundcover would not result in substantial erosion (Lang & McDonald, 2005). In areas where erosion could occur due to slope and soil exposure, erosion control devices would be installed (GEO-1).

Goats would be in one discrete area for up to approximately 36 hours and would be only allowed on slopes of less than 50 percent. As such, grazing would not occur over a duration long enough to establish trails or expose large bare areas of soil. 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"/>

Grazing would occur up to 2 weeks a year and would not require substantial vehicle trips. Grazing goats release methane, a greenhouse gas emission (Crutzen, Aselmann, & Seiler, 1986). However, the project would not directly result in a larger population of grazing goats and the size of the goat herds that would graze the prescribed herbivory sites would be small compared to the overall global population of goats, which is over one billion (Miller & Lu, 2019). The project would not increase the size of goat herds in the area or their methane contributions, which would occur with or without the project.

Vegetation thinning activities would involve manual and mechanical vegetation removal along fire roads. The project would involve vegetation thinning and would not remove any healthy, mature trees. Thinning can result in greater carbon sequestration rates by reducing competition and allowing for increased growth of larger, more resilient trees that store more carbon (CAL FIRE, 2018). These processes are not quantified but would fluctuate during initial treatment and future maintenance. Due to the current higher fuel loads, it is anticipated that a net release of carbon from removal of vegetation could occur, at least in the near-term, as the ecosystem fuel loads are restored closer to pre-fire suppression conditions and wildland fire risk is minimized while fire road access is improved, and wildfire hazards are reduced. The fluctuation would be insignificant compared to overall carbon stock in Marin County. Significant greenhouse gas emission impacts would not occur.

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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"/>

The prescribed herbivory sites are vegetated, developed areas that do not occur on or adjacent to any listed hazardous waste sites (SWRCB, 2021). Goat grazing would not require the use of hazardous materials in any quantity greater than a few gallons per year (e.g., fuel for generator operation). Grazing would not generate any significant hazardous material impacts.

Animal grazing would generally not involve equipment that could generate sparks in fire-prone areas. Electric fencing may be installed. Electric fences have a very low chance of starting a fire (Quitmeyer, 2004). Grazing animals would pose no fire hazard risks and are intended to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur.

Trucks, vehicles, and equipment are used for ongoing vegetation management along fire roads in the Novato Zone. Vehicle and equipment use at work areas and vehicle travel to and from work areas could result in a minimal risk of accidental spills of fuels or lubricants from these vehicles. Workers handling hazardous materials are required to adhere to OSHA and Cal/OSHA health and safety requirements to protect workers. As part of the project, spill prevention and response measures would be implemented that would ensure that hazardous materials are properly stored on-site and that any accidental releases of hazardous materials would be properly controlled and quickly cleaned up (HAZ-1). Off-road grading or other intense ground disturbance would not occur, ensuring that any potential unknown existing contamination would not be disturbed and would not pose a risk to the environment or public. 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"/>

A few seasonal streams and freshwater wetlands cross through or are adjacent to the prescribed herbivory sites and project roadways (USFWS, 2021). Any streams or wetlands that may intersect with the project roadways or prescribed herbivory sites would be avoided. Goats would be in one discrete area for up to approximately 36 hours. This short duration would not provide sufficient time for grazing activities to establish trails or expose large bare areas of soil. Erosion and subsequent sedimentation of waterways would not occur.

Vehicles and tracked equipment would be confined to existing fire roads. Riparian woodlands may be encountered but any vegetation trimming, or thinning, would be conducted by hand and alteration to and deposition of debris would be avoided within the bed, channel, or bank of a waterway (RR-1). Some hand pulling could occur, such as removal of invasive broom within typically 10 feet of roadways. No intense ground disturbance such as grading or off-road equipment use would occur. Generally, soil-disturbing work resulting in groundcover of less than 70 percent and 100 feet or less upslope of a waterway or riparian corridor could have some potential to cause more substantial sedimentation of the waterway or habitat

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(Lang & McDonald, 2005). The majority of the proposed manual and mechanical vegetation removal activities would not result in circumstances that would result in significant ground cover removal and, thus, significant erosion and subsequent sedimentation. For the rare instances where erosion could occur, erosion control measures would be implemented (GEO-1). 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 roadside vegetation thinning and grazing activities 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 Novato 2019-2 Fire Code, Marin wildfire Prevention Authority, Marin County Fire Code, and the Marin County Community Wildfire Protection Plan (2020). All activities conducted would comply with local land use regulations and policies.

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"/>

Vegetation removal activities would not result in the loss of availability of a known mineral resource because the work would occur along and within typically 10 feet of existing fire roads and 100 feet from structures and would not permanently alter any features. Roadside vegetation clearance and goat grazing is intended to reduce fuel loads and allow safe emergency vehicle access in the event of a wildfire 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 proposed vegetation thinning and goat grazing activities would occur weekdays from 8:00 am to 5:00 pm. This timeframe would conform with the appropriate noise ordinance (e.g., City of Novato Noise Ordinance §19.22.070, Marin County Noise Ordinance § 6.70.030(5))<sup>10</sup>,

<sup>10</sup> While these activities are not construction and do not require a construction permit, some of the equipment generates noise levels similar to construction equipment (e.g., noise level of a chainsaw is ≤82 dBA L<sub>max</sub> at 50 feet (USDOT, 2008) such that a comparison could be made and justification for ensuring work hours conform.

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which limits construction activities and other related work to Monday through Friday 7:00 am to 6:00 pm and Saturday from 10:00 am to 5:00 pm, depending upon the ordinance.

Roadway vegetation management would progress linearly along the roadway, limiting noise in any one location to a few hours. Measures to minimize noise disruption to nearby neighbors would be implemented, as needed (NOI-1). Exceedances of local noise standards would not occur (given the short duration of noise generation in any one location and existing noise levels) and significant noise impacts would not occur.

Vegetation control methods such as animal grazing would generate low levels of noise. Grazing livestock would make animals sounds such as bleating. Noises from animals would be very low at sensitive receptors because they would be intermittent and transient across the herbivory sites. Furthermore, grazing would last for up to approximately 36 hours at any given herbivory site. Truck visits to deliver goat herds, set up fencing and water troughs, monitor herds, would not occur in any one location for longer than a few days. A generator may be used for electric fences and for the herder staying on the site to tend the herd. Generators emit noise ( $\leq 81$  dBA  $L_{max}$  at 50 feet) but would not operate frequently and would be positioned away from residences (USDOT, 2008). 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"/>

The workers implementing the roadside vegetation clearance are anticipated to be sourced from the existing contractor businesses or conservation crews in the region. Goat herders are anticipated to 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.

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 indirectly necessitating more public services. 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Vegetation removal would occur within 10 feet of fire roads and goat grazing would occur within 100 feet of structures in the Marin Valley Mobile Home Park. There are no local, state, or federally designated recreational areas within the Marin Valley Mobile Home Park. Trails

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that could be used for recreation by the mobile home residents are present near the property. Work areas that are accessible to the residents or the public would be temporarily closed or flagged off during vegetation management and grazing activities. Goat grazing would occur within temporary fenced areas and would occur for up to approximately 36 hours within any one location. Goat grazing can occur congruently with adjacent recreation. Vegetation management activities along roadways would also be for a short duration, typically for only a few hours to a few days. Temporary closure of trails for grazing and vegetation removal would not affect a substantial number of recreationalists. Due to the large quantity of recreational areas in the Novato Zone, 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"/>

Treatment of an area through goat grazing would not impact access along public roadways. A maximum of 18 workers across three crews could be conducting vegetation management activities along fires roads in the Marin Valley Mobile Home Park. Daily one-way vehicle trips would range from 7 to 36, depending upon the number of crews operating and would not exceed the screening threshold of 110 trips per day<sup>11</sup>. The VMT associated with implementation of the project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b). No significant traffic impacts would occur.

Utilities and Service Systems		
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"/>

Grazing animals would require water, which would be provided from the nearest water hydrant, or fresh water could be trucked in. Biomass generated from vegetation removal activities would be processed using a chipper. An estimate 20 to 25 cubic yards of chipped material would be generated a day. As the vegetation grows back and follow up maintenance is conducted in future years, additional vegetative materials would be chipped and trucked away. Materials would be trucked to West Marin Compost, Redwood Landfill, or Marin Resource Recovery Center, which have a permitted capacity of 6,170 tons per day and would be able to accept the chipped material (CalRecycle, 2021). Any waste generated by the herders, such as spent vehicle batteries or refuse would be properly disposed of at the appropriate facility. No impact related to utilities and service systems would occur.

<sup>11</sup> 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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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"/>

The prescribed herbivory and fire road activities are within the local responsibility area and classified as a high fire hazard severity zone. No fire roads are located in areas identified as very high fire hazard severity zones (CAL FIRE, 2007/2008). The purpose of the project is to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur and improve access for emergency vehicles in the event of a wildfire. As stated above, vegetation management crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). The project would not impair an adopted emergency response plan or evacuation plan. The project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The project does not involve intense ground disturbing activities or off-road vehicle use that could result in downslope or downstream flooding or landslides should a wildfire occur.

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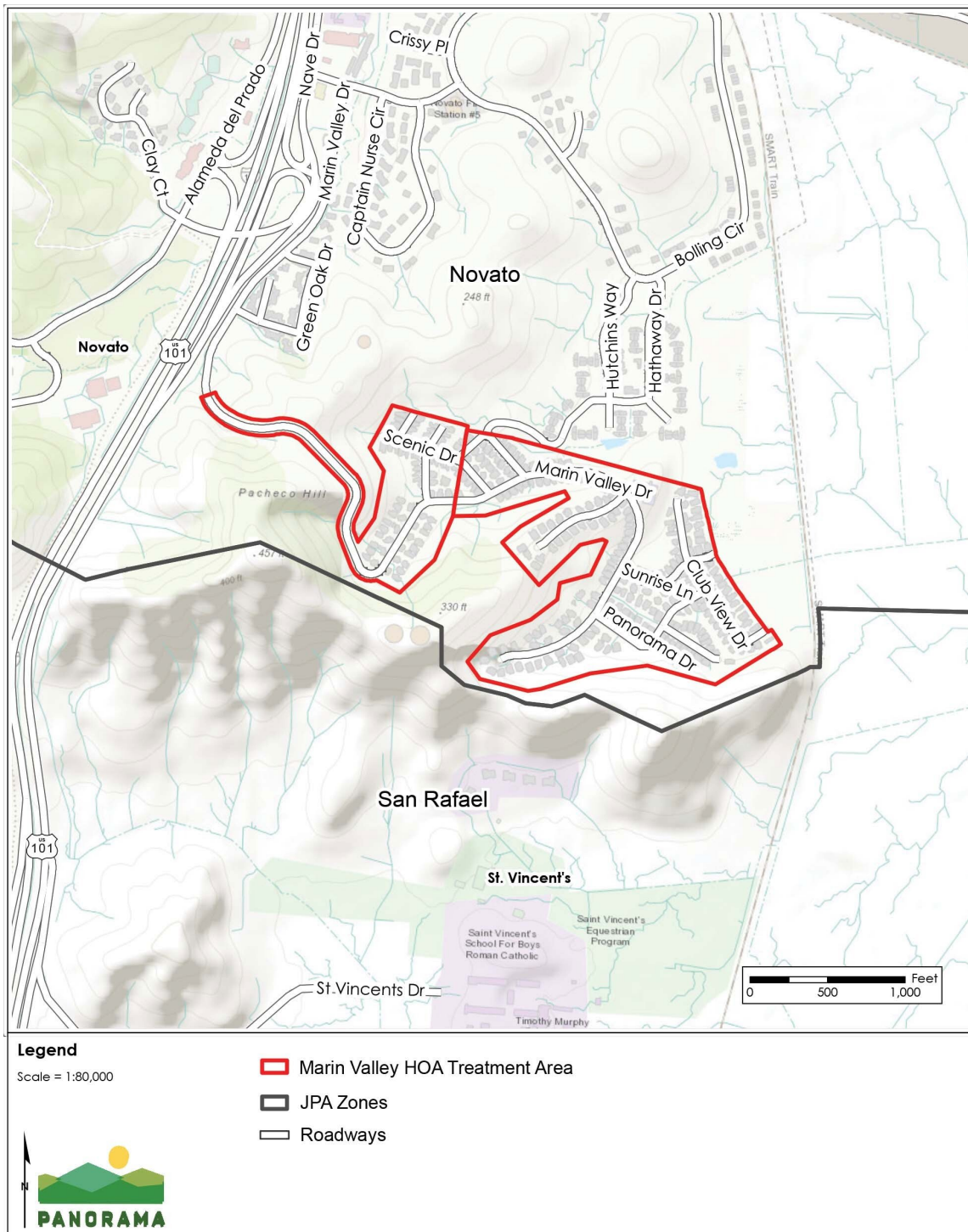
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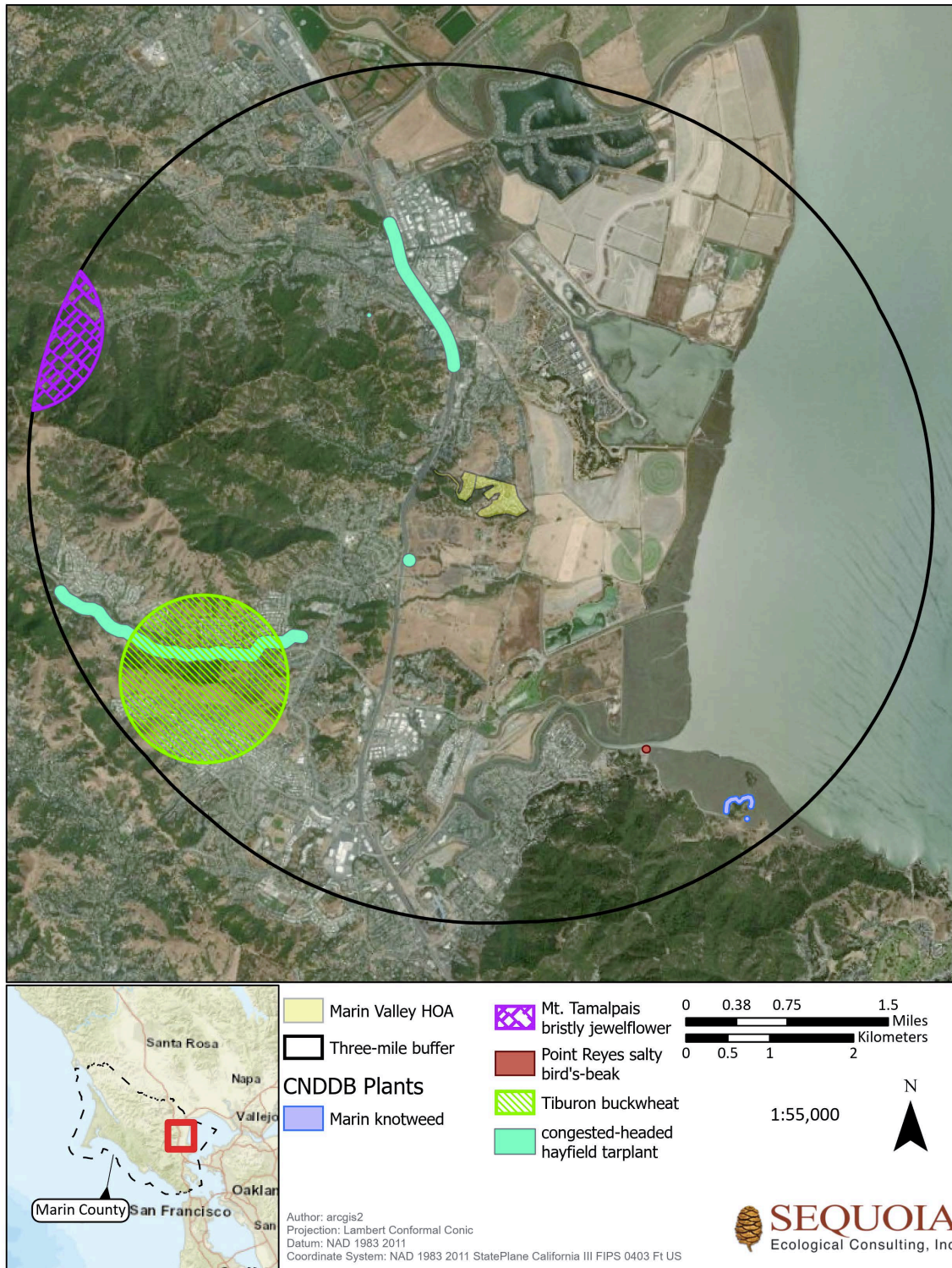
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**Figure 1 Marin Valley Mobile Home Park Treatment Areas**



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## Figure 2 Special-Status Plant Occurrences

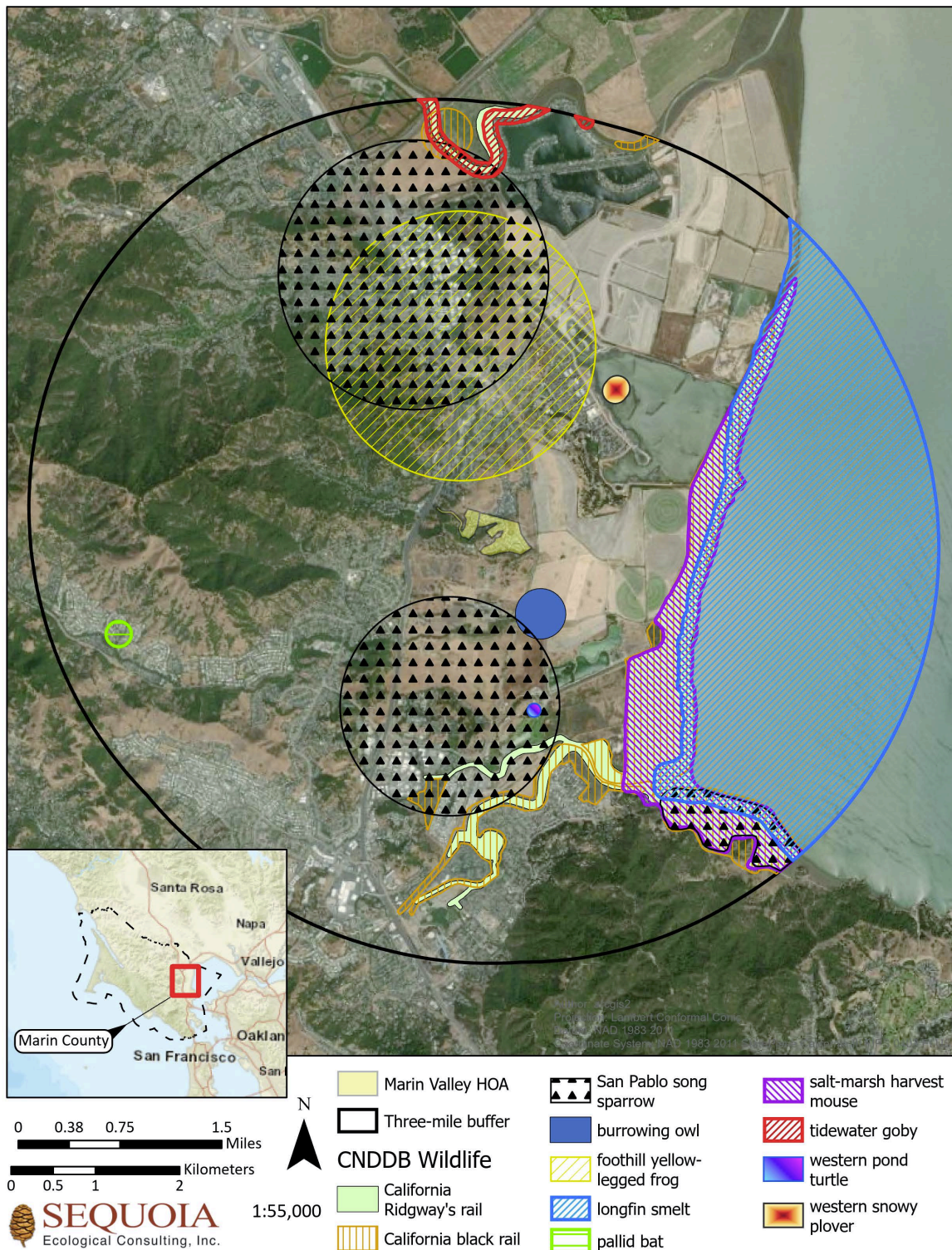


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**Figure 3 Special-Status Wildlife Occurrences**



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## **Figure 4      Northern Spotted Owl Occurrences**

Figure omitted to protect northern spotted owl nest locations.

