

MARIN  
HIGHLANDS

Page 1

IGNACIO  
VALLEY

**Notice of Exemption**

21-2022-097

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):  
Novato Fire Protection District  
95 Rowland Way  
Novato, CA 94945

FILED

APR 25 2022

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

**Project Title:** Novato Zone Marin Highlands and Ignacio Valley Fuel Abatement Project

**Project Applicant:** Novato Fire Protection District

**Project Location – Specific:** The fuel reduction zones would be located within the Marin Headlands and Ignacio Valley open space preserves.

**Project Location – City:**  
City of Novato

**Project Location – County:**  
Marin County

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

The purpose of the proposed project is to reduce fuel in City of Novato-owned open space with the intention of increasing defensible space for habitable structures and roadways that abut the open space areas, reducing the amount of non-native fire-hazardous vegetation, and reducing the potential for large crown fires to occur in open space areas. Removal of invasive nonnatives would provide an opportunity for native, less hazardous plant species to recolonize and restore these areas. The proposed project would reduce wildfire intensity, ember production, and rate of spread in the event of ignition in the wildland or built environment. By increasing defensible space between structures and open space, the proposed project would also improve safety for firefighting and emergency personnel while engaged in fire suppression during a wildfire and extend evacuation times for the community.

**Name of Public Agency Approving Project:** Novato Fire Protection District

**Name of Person or Agency Carrying Out Project:** Novato Fire Protection 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 alterations to land for fuel management activities. 15333, small habitat restoration projects
- ☐ 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 for Minor Alterations to Land and Section 15333, Class 33, for

POSTED 4/25/22 TO 5/25/22

Small Habitat Restoration Projects. A Class 4 exempt proposed 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. A Class 33 exempt project consists of projects not to exceed five acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife. The proposed project would involve vegetation reduction activities in defensible space areas 100 feet from structures and 10 feet from roads that serve as evacuation routes in the Novato Zone<sup>1</sup>. Removal of invasive species and dead and dying vegetation could occur beyond 100 feet in some discrete locations. Broom is the predominant non-native, invasive shrub in the treatment areas, although other non-native species occur. In addition to out-competing native species, dense, mature broom stands have been found to be highly flammable as the plants age, dead wood accumulates and the percent of green material to woody material decreases<sup>2</sup>. The scope of the proposed project is consistent with a minor alteration to the condition of the vegetation along the defensible space and evacuation routes, and the removal of non-native, invasive, fire-hazardous species for forest health restoration shown in Figure 1 and Figure 2.

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: [Signature]

Date: 4/25/22

Title: Veg Mgmt Program Manager

☒ Signed by Lead Agency

☐ Signed by Applicant

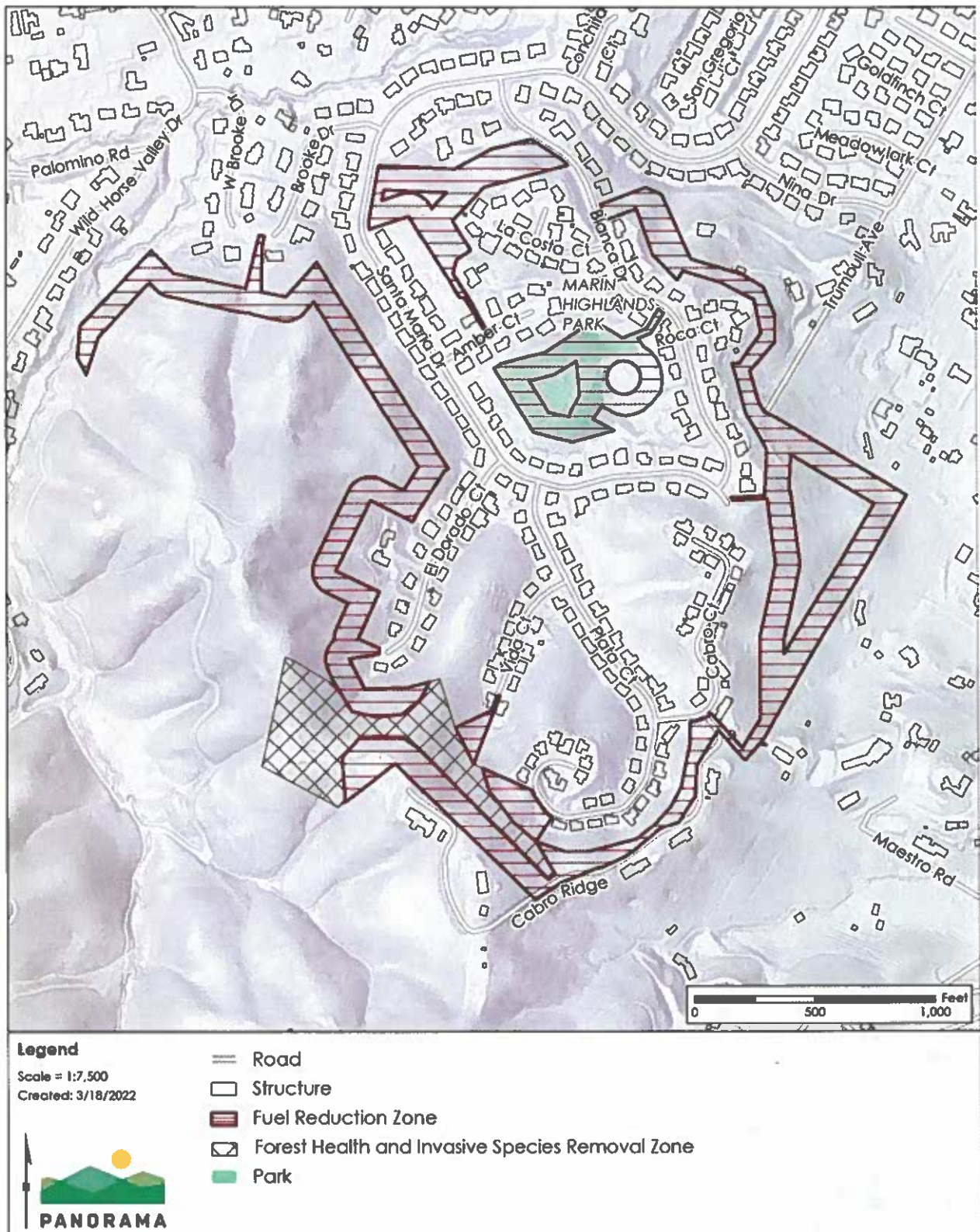
Authority cited: Sections 21083 and 21110, Public Resources Code.  
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: \_\_\_\_\_

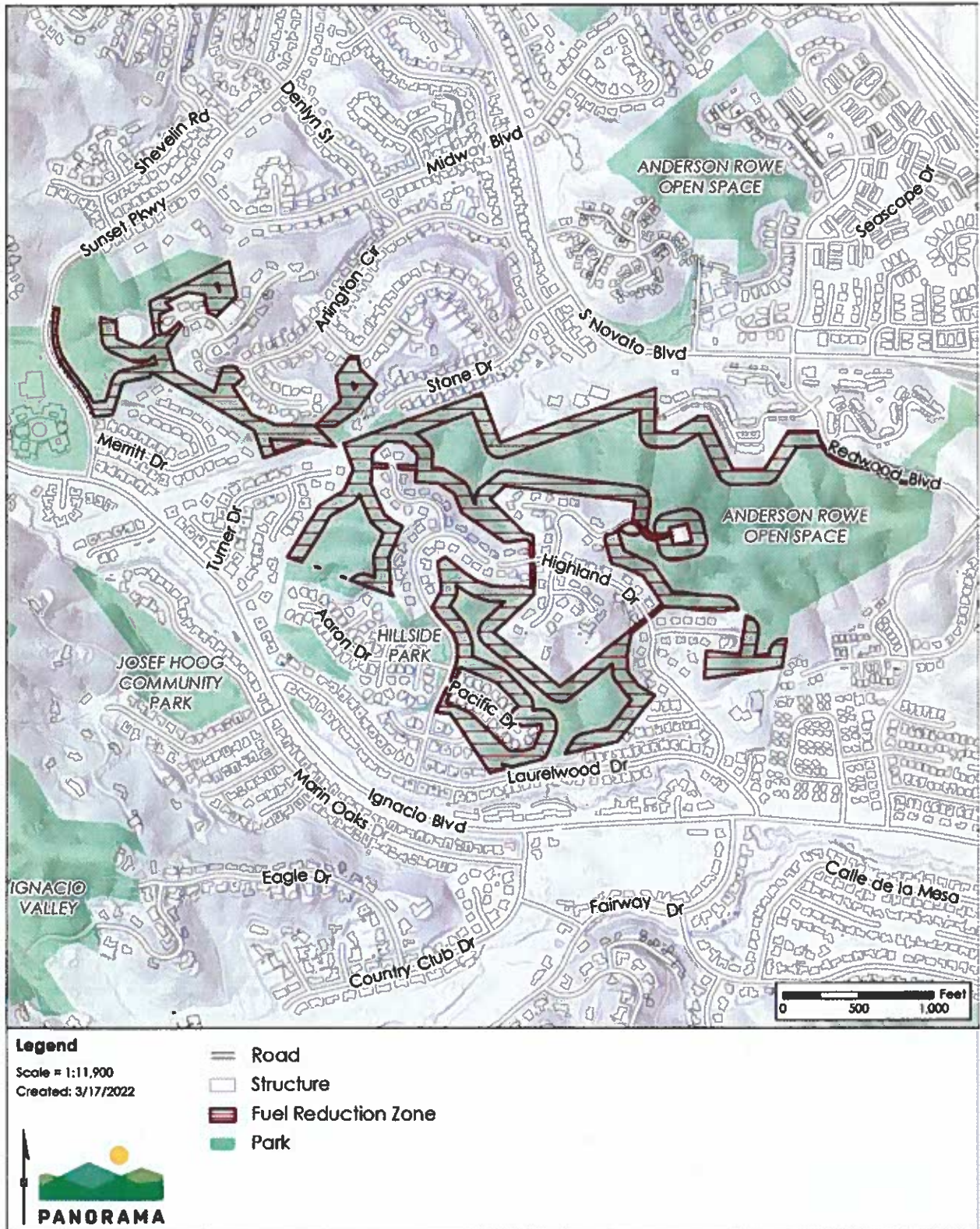
<sup>1</sup> Novato Fire Protection District. (2019). Ordinance No 2019-2 Section 4907.2. Retrieved from <https://www.novatofire.org/home/showpublisheddocument/9152/637111507697270000>

<sup>2</sup> Zouhar, K. (2005). *Cytisus scoparius*, *C. striatus*. In: *Fire Effects Information System*. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory.

**Figure 1 Fuel Reduction Zones (Map 1 of 2)**



**Figure 2 Fuel Reduction Zones (Map 2 of 2)**



# **Categorical Exemption Determination Memorandum**

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**Date:** April 25, 2022

**Project:** Novato Zone Marin Highlands and Ignacio Valley Fuel Abatement Project

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## **Categorical Exemption Summary**

The Novato Fire Protection District as the lead agency under California Environmental Quality Act (CEQA) has determined that the Novato Zone Marin Highlands (NOV-2022-L05) and Ignacio Valley (NOV-3033-L08) Fuel Abatement Project (proposed project) is categorically exempt under CEQA Guidelines Section 15304, Class 4 for Minor Alterations to Land and Section 15333, Class 33, for Small Habitat Restoration Projects. A Class 4 exempt proposed 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. A Class 33 exempt project consists of projects not to exceed five acres in size to assure the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife. The proposed project would involve vegetation reduction activities in defensible space areas 100 feet from structures and 10 feet from roads that serve as evacuation routes in the Novato Zone (Novato Fire Protection District, 2019). Removal of invasive species and dead and dying vegetation could occur beyond 100 feet in some discrete locations. Broom is the predominant non-native, invasive shrub in the treatment areas, although other non-native species occur. In addition to out-competing native species, dense, mature broom stands have been found to be highly flammable as the plants age, dead wood accumulates and the percent of green material to woody material decreases (Zouhar, 2005). Non-native, invasive pine trees may be removed in the Marin Highlands open space areas. Non-native pines are fire-hazardous and highly flammable when not properly maintained, and can contribute significantly to wildfires (Fire Safe Marin, 2022). Pines promote fire spread including litter fall, resinous sap, and retaining dead needles (University of California, 1996). Removal of non-native, invasive pines from the Marin Highlands open space areas is consistent with the City of Novato's General Plan Goal ES 21: Trees on Public Land which aims to enhance urban forests and wildlands by removing non-native species, particularly if they are invasive (City of Novato, 2020). The scope of the proposed project is consistent with a minor alteration to the condition of the vegetation along the defensible space and evacuation routes, and the removal of non-native, invasive, fire-hazardous species for forest health restoration shown in Figure 1 and Figure 2.

Defensible space treatments around the water tank in the Marin Highlands area would not commence until the Novato Fire Protection District receives approval from the North Marin Water District. The following analysis demonstrates that the proposed project would not result in adverse environmental effects, supporting the Novato Fire Protection District's determination that the proposed activities are categorically exempt under CEQA. The proposed 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 proposed 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 proposed project is a Local Project that is funded by the MWPA. Local Projects include but are not limited to ignition reduction efforts, targeted vegetation management, community wildfire home hardening demonstration props, and essential facility hardening projects.

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## **Purpose and Need**

The purpose of the proposed project is to reduce fuel in City of Novato-owned open space with the intention of increasing defensible space for habitable structures and roadways that abut the open space areas, reducing the amount of non-native fire-hazardous vegetation, and reducing the potential for large crown fires to occur in open space areas. Removal of invasive nonnatives would provide an opportunity for native, less hazardous plant species to recolonize and restore these areas. The proposed project would reduce wildfire intensity, ember production, and rate of spread in the event of ignition in the wildland or built environment. By increasing defensible space between structures and open space, the proposed project would also improve safety for firefighting and emergency personnel while engaged in fire suppression during a wildfire and extend evacuation times for the community.

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## **Project Description**

### **Treatment Area**

The proposed project would involve enhancing and increasing defensible space up to 100 feet from structures and 10 feet from roadsides using designated treatment areas on City of Novato-owned open spaces. The Marin Highlands open space areas would involve approximately 32 acres of fuel reduction treatment areas with an additional up to 5 acres of forest health and invasive species removal treatments within the zone identified in Figure 1. The Ignacio Valley open space areas would involve 51 acres of fuel reduction treatment areas. Treatment would also occur within 100 feet of a North Marin Water District water tank on the Marin Highlands open space land with North Marin Water District approval. Treatment activities would involve vegetation removal and trimming within 10 feet from road edge and up to 100 feet of structures with additional forest health treatments beyond 100 feet. No healthy, mature, scenic trees would be removed under this proposed project. The proposed project would comply with the City of Novato Municipal Code Chapter 17-3 Care of Trees and Shrubs on or Adjacent to Public Places, Parks and Playground which regulates the planting, transplanting, removal, maintenance and protection of trees and shrubs in public places in the City of Novato (City of Novato, 2022). Fuel reduction treatments would avoid wetted wetlands within the proposed project area. Treatments in the fuel reduction zones vary depending on the cover type, as described in the following sections.

### **Fuel Reduction Treatment**

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### *Grasslands*

Treatment within grassland communities would be limited to handheld manual and mechanical removal of dead woody vegetation, limited string trimming, and removal of low-lying shrubs to achieve horizontal spacing and reduce overall fuel loading. Invasive species would be removed such as broom.

### *Oak, Bay, and Mixed Woodland*

Treatment within oak, bay, and mixed woodland communities would be limited to manual and mechanical thinning using a hand crew. Smaller native trees, such as toyon or bay, would typically be retained unless the densities pose a fire hazard risk, but may be pruned. Fuel reduction work within woodland treatment areas would include pruning tree branches 6 to 8 feet above ground (not to exceed 1/3 of the tree's height) for vertical clearing, removal of dead/downed branches and dead standing trees, and the removal of small diameter (less than 8 inches diameter at breast height [DBH]) live trees to achieve horizontal spacing. Understory ladder fuels including non-native, invasive Scotch broom and French broom, and shrub-like understory tree saplings. Flammable non-native, invasive pines (i.e., Monterey pine, Italian stone pine, Aleppo pine) up to 12 inches DBH would be removed from the Marin Highlands open space areas. Non-native, invasive shrubs and trees may be spot treated to prevent regrowth. Hazardous trees (e.g., dead or dying trees) identified by an arborist or qualified fire professional may be removed. Large, downed trees and other vegetation may be winched to a chipper using a truck operated from an existing trail or roadway.

### **Forest Health and Invasive Species Removal Treatment**

Treatment within an approximately 5-acre zone in the Marin Highlands area beyond 100 feet from structures would be confined to the removal of invasive, non-native, fire-hazardous plant species including but not limited to Scotch and French broom as well as dead and dying vegetation. Non-native brush would be hand pulled, where feasible.

### **Treatment Method**

Vegetation would be removed using manual and mechanical hand tools. The equipment and tools that could be used include chainsaws, string trimmers, brush cutters, pole loppers, broom pullers, and chippers. No off-trail or off-road heavy equipment would occur. A trailer-mounted chipper or tracked chipper would be towed to work areas, depending upon site access.

Non-native, invasive shrubs and trees (i.e., pine) may be treated with herbicides after cutting, if permitted per the land managers/owners. The vegetation would be cut with tools and then herbicide painted on using spot treatments such as the cut-stump or painted application methods, which have been found to have the best success rate for control of certain species, including broom (Oneto, Kyser, & JM., 2010). Should chemical treatments be applied as part of follow-up treatment, herbicide application would be implemented according to all applicable regulations and the City of Novato Integrated Pest Management Policy and Program, when implemented on City-owned property (City of Novato, 2021). Herbicides would not be applied within 24 hours of a known rain event and signs would be posted at the project site within or adjacent to public recreation areas, residential areas, schools, or any other public areas at least 1 day prior to application and would remain posted on-site at least 1 day following application.

### **Disposal**

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Vegetative debris would be disposed of through chipping and hauling, chipping and broadcasting, and/or lopping and scattering. Vegetative material disposed of at the work area would be fed through a chipper and broadcasted or cut and scattered around the work area. Chipped material spread on site would be chipped to under 3 inches in size would be applied 2 to 4 inches in depth at most to minimize wildfire risk. Grass cuttings from mowing would be left on site to decompose. The facility used for disposal would be Marin Resource Recovery Center, or Recology facilities in Novato or West Marin. It is anticipated that an estimated 20 to 25 cubic yards of vegetative debris would be disposed of each workday.

In addition to chipping, pile burning may be used in the Marin Highlands open space area due to limited access to remove cut vegetation or haul in a chipper to the work area. Cut material may be pile burned depending upon the conditions of the work area. Desirable treatment areas are typically flat or have gentle slopes and have open areas away from tree canopies and power lines. In sloped and forested areas burning would be conducted in a way that avoids damage to trees. Areas selected for pile burning would be away from waterways. Piles would generally be 4 feet in diameter and 4 feet in height, but pile dimensions may vary. Multiple piles may be burned on a single day. Pile burning would be conducted in compliance with Bay Area Air Quality Management District (BAAQMD) Regulation 5 for open burning and burn day restrictions.

### **Workers**

Contractor crews would conduct the vegetation removal and chipping along roadways. Each crew would typically consist of 3 to 7 workers. It is anticipated that up to 4 crews would be conducting treatment at the same time.

### **Site Access**

The proposed project work would occur from public and private paved roadways. Lane or partial lane closures may be needed for work along roadways. Any lane closures would either require encroachment permits, or if within the City of Novato limits and completed by the City of Novato, would be noticed appropriately. Crews would be able to access the site on foot; no new roads would be created, and no ground disturbance by way of heavy equipment would occur.

### **Schedule and Duration**

Treatments would occur during weekdays between 8:00 am and 5:00 pm. Initial treatment activities may begin in spring 2022 and continue through spring 2023. Annual grass mowing typically occurs from April through June depending on rainfall patterns. It is estimated that the treatment activities in the Marin Highlands open spaces would occur over a 4-week period and 3 weeks in the Ignacio Valley open space area. Maintenance would occur every 3 to 5 years in woodlands and annually in grasslands. Areas of broom removal would initially be monitored one year after work and then every 2 or 3 years subsequently. Subsequent treatments are anticipated to be the same as the proposed activities but are subject to change depending on the condition of the fuel reduction and invasive species removal zones and response to initial treatment.

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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 footnotes after each name. The following specific design and implementation measures are part of the proposed 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 Tribal Heritage Preservation Officer(s) (THPO) from a local tribe (Federated Indians of Graton Rancheria [Graton Rancheria]) will be notified of the opportunity to attend and/or train crews. The training will address the potential for encountering subsurface cultural 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/or THPO, as appropriate, and understanding all procedures required under 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.

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. Data regarding archaeological resources will be kept confidential per law. As appropriate, the qualified archaeologist will inform Graton Rancheria's THPO of the discovery. 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 and the work area can only be accessed on foot as determined acceptable by the qualified cultural resource specialist/archaeologist.

Alternatively, the qualified archaeologist and/or THPO or tribal monitor will evaluate the resource and determine whether it is:

- Eligible for the 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 resource is determined to be neither a unique archaeological, an historical resource, nor a potential tribal cultural resource, work may commence in the area.

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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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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 THPO 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.

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

Prior to implementation of vegetation management activities that have potential for intensive ground disturbance below the ground surface, significant heat from a burn, 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. Outreach with Graton Rancheria will be conducted as early as feasible to obtain information regarding culturally sensitive areas and/or the location of tribal cultural resources within the project areas. Any information provided by Graton Rancheria and/or tribal monitor(s) is confidential and exempt from public disclosure in accordance with statutory and regulatory requirements (Gov. Code § 6254(r), 6254.10; PRC § 5097.98(c); Cal. Code Regs. § 15120(d)). Records searches and field survey results will be shared with Graton Rancheria, as appropriate. Resources found during the records search, tribal outreach, 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 impacts 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.

### **CUL-5 Cultural Resources Monitoring**

Based on the results of CUL-3 and -4<sup>3</sup>, cultural resources monitoring may be conducted in order to avoid impacts to known resources. In addition to flagging the resource for avoidance (as described in CUL-2 or CUL-3) if monitoring is conducted, a qualified archaeologist will be present during ground disturbance work to ensure the known or previously unidentified resources are avoided and protected during project implementation, and if the resource is identified to be pre-contact archaeological and/or a tribal cultural resource, a tribal monitor will be invited to attend during the ground disturbance work.

### **ET-1 Environmental Training for Biological Resources<sup>4,5</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

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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> CUL-4 is not relevant to the proposed project.

<sup>4</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>5</sup> Adapted from measures in the Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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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 CE 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 moderate to 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 that has the potential to damage perennial plants or is proposed to occur during the flowering season for the specific annual 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 may include but may not be limited to mowing, weed whacking, off-road vehicle and heavy equipment use, disking, and prescribed burning.

Surveys for rare plants will occur for these species across the entire project footprint. Surveys will occur during the blooming period, if feasible, and will occur prior to work for the specified special-status plant. If blooming period surveys are not feasible and the sensitive plant in question can be keyed to genus outside of the blooming period, surveys will be conducted for all members of the genus. Individuals will be flagged for avoidance or modified methods. Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat and removal after completion. For physical avoidance, a buffer may be implemented as determined necessary by the biologist. Sensitive species damage or loss avoidance may include implementation of appropriate species-specific no-activity buffers around sensitive resources. Temporary fencing will also be implemented, as and where determined necessary based on the species tolerance, if grazing is prescribed in the area of flagged individuals for avoidance or modified methods (WILD-1).

### **IP-1 Clean Equipment<sup>5,6</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.

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<sup>6</sup> Adapted from measures in the Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

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### **IP-2 Prevent the Spread of Invasive Species and Plant Pathogens<sup>5,6</sup>**

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>5,6</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>5,6</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.
- 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.

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- 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.

### **GEO-3 Soil Saturation and Rain Event Measures<sup>1,2,5</sup>**

The following measures will be implemented to prevent soil loss and erosion during rain events and following rain events:

- Shut down use of off-road heavy equipment, skidding, and truck traffic when soils become saturated (from rain event) and unable to support the machines. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur.
- Off-road heavy equipment work will be suspended if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours
- Ground disturbing work (e.g., use of heavy equipment, pulling large vegetation) will not occur during rain events (i.e., 0.5 inch of rain within a 48-hour or greater period  $\geq$  1.5 inches in 24 hours) and may resume when precipitation stops and soils are no longer saturated. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials.
- For activities that involve ground disturbing work and have not been stabilized, inspect for evidence of erosion after the first rain event (i.e., 0.5 inch of rain within a 48-hour or greater period) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours.
- For activities that involve ground disturbing work, inspect project areas for the proper implementation of erosion control, as necessary and determined by the qualified personnel (e.g., RPF), prior to the rainy season. If erosion control measures are not properly implemented, the measures will be remediated prior to the first rainfall event.

### **HAZ-1 Leak Prevention and Spill Cleanup<sup>1,5</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
-

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- 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
- 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>1,4,5</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

### **HAZ-3 Pile Burning**<sup>4</sup>

The following measures will be implemented to reduce hazards associated with pile burning:

- Pile burning will only be allowed on days when fire is less likely to spread (e.g., wind speeds are less than 15 mph).
- Piles will only be constructed in areas where burning can be safely controlled, for example, on the flattest area possible. Bottoms of steep, vegetated hills will be avoided.
- Piles should be constructed with 10 feet of clearance around them.
- Piles will be set back from public roads and trails at a distance to minimize risk to the public or cordoned off from the public.
- All requirements of CAL FIRE, the local fire department, and/or the BAAQMD will be met, including any permit, notification, burn bans, and reporting requirements.
- Have fire suppression crews on-site during the fire season determined by CAL FIRE or the local fire department (typically mid-May to mid-November) during curtain and pile burns.
- Pile burning will adhere to BAAQMD criteria pollutant thresholds and Regulation 5 for open burning.

### **HAZ-4 Application of Herbicides**<sup>5</sup>

- Projects will comply with all herbicide application regulations and ecologically sound integrated pest management principles.
  - Herbicide containers will be triple rinsed with clean water at an approved site, and rinsate will be disposed of by placing it in the batch tank for application.
-

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- Herbicide drift to public areas or sensitive areas will be minimized through the following measures:
  - Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative).
  - No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities.
  - Spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift.
  - Low nozzle pressures will be utilized.
  - Spray nozzles will be kept within 24 inches of vegetation, if spraying.
- For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, signs will be posted at each end of herbicide application areas and any intersecting trails notifying the public of the use of herbicides at a minimum 1 day before and 1 day after herbicide use.

### **HYD-5 Protect Vegetation and Special-Status Species from Herbicides<sup>5</sup>**

The project proponent will implement their approved integrated pest management (IPM) procedures when utilizing herbicides, or the following measures if no IPM is in place that addresses herbicide use in sensitive areas:

- Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway.
- Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry.
- No terrestrial or aquatic herbicides will be applied within Watercourse and Lake Protection Zones (WLPZs) of Class I<sup>7</sup> and II<sup>8</sup> watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application.
- No herbicides will be applied within a 50-foot buffer of federal Endangered Species Act (ESA) or California ESA listed plant species or within 50 feet of dry vernal pools.

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<sup>7</sup> A Class I watercourse includes any domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area, and/or fish are always or seasonally present onsite, and includes habitat to sustain fish migration and spawning.

<sup>8</sup> A Class II watercourse has fish always or seasonally present offsite within 100 feet downstream, and or aquatic habitat for nonfish aquatic species. Class II watercourses excludes Class III waters that are tributaries to Class I waters.

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- For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by California Department of Pesticide Regulation, if warranted) to prevent overspray.

### **NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptor<sup>5,9</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).
- 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

### **NB-1 Nesting Bird Season Avoidance<sup>1,5,6,10</sup>**

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through July 31<sup>11</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>1,5,6</sup>**

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 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.

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<sup>9</sup> Adapted from measures in the San Francisco Public Utilities Commission (SFPUC), Standard Construction Measures, July 2015.

<sup>10</sup> Adapted from measures in the Marin County Parks (MCP), Bird Nesting Survey Training Manual, 2017.

<sup>11</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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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 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>1,5,6,10</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>1,5,6,10</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 Prewrite Survey<sup>4,5</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

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roosting sites may be removed. Roosting initiated during work is presumed to be unaffected, and no buffer would be necessary.

### **RB-2 Avoidance of Maternity Roosts and Day Roosts<sup>4</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>4</sup>**

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 (March 1 through July 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>4</sup>**

Potential non-colonial roosts that must be removed in order to address a safety hazard, can be removed after consultation with a biologist. Removal will occur 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.

### **SH-1 Riparian Resources – Project Design<sup>5,6</sup>**

Work will be avoided in riparian and wetland areas. Some treatment may be approved on a case-by-case basis. 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. Work will only be permitted in dry conditions, where soil is not saturated and no rain (precipitation of 0.5 inch or greater) has occurred in the past 24 hours. Allowable activities include hand removal 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. No foot traffic or equipment will be permitted to enter a wetted channel at any time. 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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### **SH-3 Minimization of Pile Burning Disturbance** <sup>12,13</sup>

Pile burning will not be performed in sensitive habitats, such as serpentine-associated communities, wetlands, or riparian areas. If piles are burned on a different day than piled, the piles should be moved prior to burning to ensure wildlife is not present, such as by re-piling by hand, or a qualified biologist will inspect the pile prior to burning to ensure wildlife are not present. If moving or inspection of the piles is not feasible, the pile will be lit from one side and allowed to burn slowly to the other side, in order to allow any wildlife to relocate, rather than lighting the entire pile at once.

### **TR-1 Emergency Access to Project Areas** <sup>4,5</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>4</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.

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<sup>12</sup> Adapted from measures in the Marin County Open Space District (MCOSD). (2015, April). Vegetation and Biodiversity Management Plan. *Best Management Practices*.

<sup>13</sup> Adapted from measures in the California Department of Fish and Wildlife (CDFW). (2011). California Endangered Species Act Incidental Take Permit No. 2081-2011-046-03. *Wildfire Hazard Reduction and Resource Management Plan*. East Bay Regional Parks District

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### **Discussion of Potential Exceptions (CEQA Section Guidelines 15300.2)**

#### **(a) Location:**

Sensitive habitats, including watercourses and wetland areas would be avoided by manual and mechanical treatments. 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 (SH-1). Only herbicides approved for use in aquatic environments would be applied by hand in riparian habitats and only during low-flow periods (HAZ-6). Due to the scope and design of the proposed project, the proposed project would not adversely affect riparian habitats as the work would not affect shade or species diversity and could be beneficial if invasive species removal is needed, therefore, exception (a) does not apply.

#### **(b) Cumulative Impact:**

Other defensible space and fuel reduction treatments between communities is occurring in the Novato Zone and greater Marin County but would not be conducted within the same area as this proposed project and would not result in cumulative impacts as defined in CEQA Guidelines Section 15300.2. Ongoing maintenance of the fuel reduction zones would be limited to the types of activities previously described, which would be performed periodically to create defensible space between structures and roadways and open space. The visual character of the fuel reduction zones would be modified each time vegetation treatments are implemented as vegetation regrows, due to reduction in vegetation cover and type (e.g., broom removal), but the natural character would remain. The design and implementation of this proposed project includes features (e.g., CUL-1, ES-1) that ensure that significant effects on environmental resources are avoided over successive years of maintenance. As such, the proposed 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 vegetation management activities and future maintenance activities are considered routine and are prevalent and typical throughout the County and Bay Area region. Sensitive waterways would be avoided. Significant effects on special-status species would not occur (e.g., NB-1, RB-1). The proposed project would modify vegetation, but the natural character would remain and the aesthetic change would not be substantial. Therefore, there are no unusual circumstances associated with the proposed 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 work areas such as that fuel treatments could be visible; 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, there are no hazardous waste sites located within or adjacent to the fuel reduction zones (SWRCB, 2021). No substantial ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

#### **(f) Historical Resources:**

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Some hand pulling of invasive plants could occur. As part of the proposed project, workers would participate in a cultural training prior to project implementation (CUL-1). A records search was conducted prior to work that did not identify any resources to avoid (CUL-3) (Far Western, 2022). Should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided or only methods allowed by a qualified cultural resource specialist/ archaeologist would be implemented (CUL-2). If any resources are discovered during implementation that require monitoring to continue treatment in the area, a qualified archaeological would be present and, as appropriate, a tribal monitor would be invited to monitor during ground disturbance (CUL-5). Proposed project 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. 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 visual character within the proposed fuel reduction zones is characterized by primarily residential and forested recreational areas. Vegetation consists of densely forested mountain areas as well as grassy lowlands and hills. Viewers in the vicinity of the fuel reduction zones would primarily be recreationalists the Marin Highlands and Ignacio Valley open space areas and homeowners that are adjacent to the fuel reduction areas. Motorists on some public roads may be able to see segments of the fuel reduction areas.

Equipment and trucks performing the work would be temporarily visible along or staged near these fuel reduction zones. The vegetation thinning activities would be in one area for a short period of time (a few hours to a day) and the work would be performed in a limited area within the fuel reduction zones at any given time.

Minor changes to the vegetation patterns and form would occur from manual and mechanical removal of small or hazard trees and shrubs, non-native pine trees, as well as weed removal within up to 100 feet of structures with an additional zone of weed, dead, and dying vegetation in the Marin Highlands area. No healthy, mature, scenic trees would be removed as part of this proposed project. The vegetative material would be chipped or cut and either broadcast on site or hauled away from the work area, or pile burned. Viewers in the immediate vicinity may notice changes in the density and type of the vegetation within the fuel reduction zone. These methods of vegetation thinning currently occur in the Novato Zone as well as throughout broader Marin County to create defensible space between structures and open space. This type of work and vegetation management is typical of the area and a characteristic part of the existing environment. The proposed project would not degrade recreationalists or motorist views from nearby roads or trails because the visual change would be minimal, is typical in the area, and would mostly only extend up to 100 feet from structures. Non-native, pine tree removal would restore the visual character of the area by removing non-native vegetation allowing native species to recolonize. The natural vegetation and characteristics of the areas would remain. Visual degradation as seen from State or locally

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designated scenic roads or vistas, including the Marin County ridge and upland greenbelt areas, would not occur.

Pile burning, if conducted in the Marin Highlands area, would result in visual impacts from the staging of debris to allow the vegetation to dry, burning the debris, smoke plumes from the burn, and the appearance of scorched vegetation. Piles would be located in open areas away from any dense vegetation or forests. While piles may be visible to the public, pile burning would be temporary. Pile burns may result in smoke plumes but would generally be smaller, although smoke may be visible from a distance. Pile burns would typically last a day, and visual exposure to the public from smoke plumes would be minimal. 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 vegetation thinning activities would not convert designated farmland to non-agricultural uses. Proposed project activities would primarily involve thinning and removal of small fire-hazardous trees, shrubs, and underbrush. The proposed project 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 fuel reduction activities would emit diesel particulate matter and criteria air pollutants. In a typical day, it is assumed that worker trucks, chainsaw, chippers, and mechanical hand tools would operate for a few hours per crew and up to one off-haul trucks would travel to a green waste disposal center a day. No tilling or grading activities that could generate fugitive dust emission would occur.

Pile burning may occur in the Marin Highlands area instead of chipping to dispose of vegetative debris depending on the conditions of the work area. Pile burning would emit air pollutants including particulate matter. Pile burning of vegetative debris would comply with restrictions required by BAAQMD's Regulation 5. The piles of debris burned in any one year and any ongoing treatment activities would not exceed the BAAQMD significance thresholds (Urbanski, 2014; USFS, 2021; USDA, 2014). Pile burning would be conducted by qualified professionals in accordance with the burn permit and standard industry practices including the California Forest Practice Rules, which would ensure the safety of workers conducting the pile burns. 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"/>

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Biological database searches for the vicinity of the fuel reduction zones were conducted (WRA Environmental Consultants, 2020a; WRA Environmental Consultants, 2020b). 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, oak woodland, California Bay forest, and perennial purple needlegrass grasslands are known occur along or near the fuel reduction zones (WRA Environmental Consultants, 2020a; WRA Environmental Consultants, 2020b). Some of these habitats and associations are considered sensitive vegetation communities (CDFW, 2021). String trimming may occur in the fuel reduction areas, which could increase native annual forb diversity for purple needlegrass grasslands after treatment due to the reduction of competition from non-native grasslands. Oak and bay trees would be limbed and dead or dying trees removed. Small, overly dense stands of oak or bay trees may be removed if considered fire hazardous, but otherwise native trees would remain in place. Treatment within the fuel reduction zones would be limited to vegetation thinning and the removal of fire-hazardous vegetation, which would not alter the vegetation communities leading to type conversion or loss.

No critical habitat for sensitive plants occurs within the vicinity of the work area. No serpentine soils are documented within the proposed project area and therefore serpentine-associated communities are not present (USDA, 2020). Some special-status plant species have a moderate potential to occur within the fuel reduction area (refer to Table 1 for information of known occurrences in relation to the proposed fuel reduction zone).

Pile burning may be conducted in the Marin Highlands fuel reduction zone as a vegetation disposal method. Material would not be piled and burned in sensitive habitats (SH-3). Pile burns would affect a relatively small area. Workers would conduct vegetation trimming and removal with handheld manual and mechanical tools throughout the work area, including in any riparian areas (SH-1).

Herbicides may be applied in a targeted manner, such as stump treatment or spot spray, to non-native, invasive plant species to prevent resprouting, minimizing risk to non-target species. Herbicides would not be applied within a 50-foot buffer of any ESA or California ESA listed species (HYD-5). 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 (ET-1). The training for this proposed project would involve identification of Fragrant fritillary and Congested-headed hayfield tarplant for avoidance if encountered within the fuel reduction zone.

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 generally would not disrupt the seed banks of these species. Workers would clean equipment and handle vegetation to avoid spreading invasive species and plant pathogens when moving between different proposed project locations (IP-1, IP-2, IP-3).

The blooming seasons for the fragrant fritillary and congested-headed hayfield tarplant are February to April and April to November, respectively (Calflora, 2022; Calflora, 2022). Initial treatment is anticipated to begin in spring 2022. Most activities associated with the proposed project are not anticipated to crush or cut vegetation that could result in loss of the blooming body of special-status plants. String trimming would be limited to grassland habitat and

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impacts to fragrant fritillary or congested-headed hayfield tarplant would be unlikely. Chips may be spread on-site with consideration for wildfire risk as well as potential for special-status plants to occur in a given area. For the species of rare plants that have a moderate 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). Any individuals found during the pre-work surveys would be flagged for avoidance or modified methods. All sensitive plant species have a low to no potential to be impacted by vegetation removal activities with the worker training and surveys for avoidance or modified methods, when needed, as shown in Table 1. Significant impacts on native vegetation communities and special-status plants species would not occur.

### **Special-Status Wildlife**

Some wildlife species have a moderate potential to occur within the fuel reduction zones (refer to Table 1 for information for locations of known occurrences in relation to the proposed project). Impacts to these species, however, would be avoided during design and implementation of the proposed project, as specified in the various PDIFs. Workers would be trained to identify and avoid the types of wildlife species with a potential to occur in the work areas (ET-1). The pallid bat and white-tailed kite have a moderate potential to occur within the proposed project area. Proposed project activities could occur from February 1 to July 31, during which time appropriate nesting bird and/or maternity roosting bat surveys would be conducted to avoid any effects to nesting birds and maternity roosting bats, including the pallid bat and white-tailed kite (per PDIFs NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4).

Northern spotted owl activity centers are located within 3 miles of the project areas but none are documented within 1 mile of the fuel reduction zones (CDFW, 2020). Vegetation treatment and removal would target invasive, non-native, and fire-hazardous vegetation and accumulative dead biomass along the fuel reduction zones. Small trees, 8 inches DBH and smaller, would be removed as part of clearance for horizontal spacing. This vegetation would grow back and be retreated as needed. Vegetation treatment would occur within generally up to 100 feet from structures and some additional forest health and invasive species removal treatments in the Marin Highlands area. Northern spotted owl typically prefer dense canopy closure of mature and old-growth trees with logs, standing snags, and live trees with broken tops. The owls also require open space in the understory to allow flight under the canopy to forage (USFWS, 2020). Most of the Marin County owls are known to use younger forests than those further north in California (MMWD, 2019). The proposed project would thin vegetation in the understory and reduce the risk of high intensity fire that could permanently damage established nest sites. The proposed project would also improve foraging habitat for northern spotted owl by reducing understory density and therefore permitting foraging by owls in flight. A study of dusky-footed woodrats in the redwood region of California did not find an association between abundances of woodrats and different intensities of forest thinning (Hamm & Diller, 2009). Due to the sensitivity to human presence, northern spotted owls are less likely to nest within the fuel reduction zones as these areas are directly adjacent residential communities and no known occurrences occur within 1 mile. Given the work would be focused on removal of hazardous fuels and invasives species near structures and roads and the relatively low intensity of the vegetation thinning activities, the work would not be considered major habitat alteration for northern spotted owls.

Piles for burning, if used in the Marin Highlands area, would be moved prior to burning to ensure wildlife could relocate, or a qualified biologist would inspect the piles prior to burning. If the piles are unable to be re-piled or inspected, the piles would be lit from one side and

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allowed to burn slowly to the other side of the pile to allow any wildlife time to vacate the pile (SH-3). Significant impacts on special-status wildlife species would not occur.

### **Wetlands**

Streams intersect or occur adjacent to the proposed project areas (WRA Environmental Consultants, 2020a; WRA Environmental Consultants, 2020b). In accordance with the City of Novato Waterway and Riparian Protection Ordinance, streams would be avoided by project activities, and a 50-foot buffer would be established from stream centerlines. Seasonal wetlands would not be encountered within the Marin Highlands or Ignacio Valley fuel reduction zones (WRA Environmental Consultants, 2020a; WRA Environmental Consultants, 2020b). Due to the type of project and extent of vegetation activities generally out to 100 feet from structures along the Marin Highlands and Ignacio Valley communities, wetlands may be encountered, but no activities would occur within wetlands. Only herbicides approved for use in aquatic environments would be applied by hand in riparian habitats and only during low-flow periods (HAZ-6). Training would ensure that workers conducting manual and mechanical activities to 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	Potential to occur in treatment areas
<b>Sensitive Plants</b>			
<i>Fritillaria liliacea</i> <sup>a</sup>	Fragrant fritillary	CNPS 1B.2	Moderate Potential. The proposed project area contains grassland habitat that may be suitable for this species. Can be identified and avoided with training (ET-1). Work will occur outside of the blooming period and measures will be taken to avoid impacts to the seed bank. If work that could damage flowering body occurs during blooming season, surveys would occur (ES-1).
<i>Hemizonia congesta</i> ssp. <i>Congesta</i> <sup>a</sup>	Congested-headed hayfield tarplant	CNPS 1B.2	Moderate Potential. The proposed project area contains grassland habitat that may be suitable habitat for this species and has a moderate potential to occur. It was not observed during the site visit on September 30, 2020. Can be identified and avoided with training (ET-1). Work will occur outside of the blooming period and measures will be taken to avoid impacts to the seed bank. If work that could damage flowering body occurs during blooming season, surveys would occur (ES-1).
<i>Hesperolinon congestum</i> <sup>a</sup>	Marin western flax	CNPS 1B.2, FT, ST	No Potential. The proposed project area does not contain serpentine substrates necessary to support this species.
<i>Streptanthus glandulosus</i> ssp. <i>Pulchellus</i> <sup>a,b</sup>	Mt. Tamalpais bristly jewelflower	CNPS 1B.2	No Potential. The proposed project area does not contain serpentine substrates necessary to support this species.
<b>Sensitive Wildlife</b>			
<i>Laterallus jamaicensis</i> <sup>b</sup>	California black rail	FT	No Potential. The proposed project area lacks suitable dense marsh habitat to support this species and has no potential to occur.

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Scientific Name	Common Name	Sensitive Status	Potential to occur in treatment areas
<i>Rallus obsoletus obsoletus</i> <sup>b</sup>	California Ridgeway's rail	FE, SE	No Potential. The proposed project area lacks suitable dense marsh habitat to support this species and has no potential to occur.
<i>Rana boylei</i> <sup>b</sup>	Foothill yellow-legged frog	SE	No Potential. The proposed project area lacks perennial streams that could potentially support this species and has no potential to occur.
<i>Antrozous pallidus</i> <sup>a</sup>	Pallid bat	SSC	Moderate Potential. Large trees may support roosts; however, large trees and snags will be surveyed prior to removal if work occurs during the bat maternity roosting period and roosting trees avoided. Bat identification and roosting avoidance will be included in the environmental training for crews (RB-1, RB-2, RB-3, RB-4, ET-1).
<i>Eucyclogobius newberryi</i> <sup>b</sup>	Tidewater goby	FT	No Potential. The proposed project area lacks tidally influenced waters to provide habitat for this species and has no potential to occur
<i>Melospiza melodia samuelis</i> <sup>a,b</sup>	San Pablo song sparrow	SSC	Unlikely. The proposed project area lacks the emergent tidal and brackish marsh that his species prefers. It may occasionally forage or migrate through the project area but is unlikely to nest there. Work would occur outside nesting season or surveys will be conducted and active burrows avoided (NB-1, NB-2, NB-3, NB-4).
<i>Corynorhinus townsendii</i> <sup>a,b</sup>	Townsend's big-eared bat	SSC	Unlikely. The proposed project area lacks the caves and structures that this species prefers. Large trees may support occasional day roosts; however, large trees and snags will be surveyed prior to removal if work occurs during the bat maternity roosting period and roosting trees avoided. Bat identification and roosting avoidance will be included in the

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Scientific Name	Common Name	Sensitive Status	Potential to occur in treatment areas
<i>Emys marmorata</i> <sup>a,b</sup>	Western pond turtle	SSC	environmental training for crews (RB-1, RB-2, RB-3, RB-4, ET-1).  Unlikely. The proposed project area lacks suitable perennially ponded backwaters to support this species and has no potential to occur.
<i>Elanus leucurus</i> <sup>a</sup>	White-tailed kite	FP	Moderate Potential. The proposed project area contains open oak and grasslands habitat that this species can forage and nest in and has a moderate potential to occur. Work would occur outside nesting season or surveys will be conducted (NB-1, NB-2, NB-3).
<i>Strix occidentalis caurina</i> <sup>a,b</sup>	Northern spotted owl	FT, CT	Unlikely. The nearest activity center and nests are documented over 1 mile away from the fuel reduction zones. Can be identified and avoided with training (ET-1). Work would occur outside nesting season or surveys will be conducted and active burrows avoided (NB-1, NB-2, NB-3).

## Notes:

Species with occurrences within 2 miles of the project areas were examined.

<sup>a</sup> Relevant to the Marin Highlands fuel reduction zone.

<sup>b</sup> Relevant to the Ignacio Valley fuel reduction zone.

FE	Federally Endangered	CR	California Rare
FT	Federally Threatened	CC	California State Candidate
FC	Federal Candidate	FP	Fully Protected
CE	California State Endangered	SSC	California State Species of Special Concern
CT	California State Threatened	CNPS	California Native Plant Society Ranks

Source: (WRA Environmental Consultants, 2020a; WRA Environmental Consultants, 2020b; CDFW, 2021)

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Cultural Resources and Tribal Cultural Resources <sup>14</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"/>

Equipment and vehicles for the fuel reduction activities would operate from existing roads and trails adjacent to the fuel reduction and invasive species removal areas. No intense ground disturbing activities (e.g., discing) would occur. While some hand pulling of invasive species may occur and larger vegetation may be winched across the ground, the potential to disturb cultural resources is generally low since this work results in little ground disturbance and no heavy equipment use. Workers would participate in a cultural training prior to proposed project implementation (CUL-1) and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided conducted (CUL-2). If any resources are identified during the cultural records search or discovered during implementation that require monitoring to continue treatment in the area, a qualified archaeological would be present and, as appropriate, a tribal monitor would be invited to monitor during ground disturbance (CUL-5). A cultural resources records search was completed for the fuel treatment zones prior to the disturbance and no recorded cultural resources were found to occur in these areas (CUL-3) (Far Western, 2022).

Pile burning, if used in the Marin Highlands area, would not cause ground disturbance. Heat from a wildfire or a prescribed burn may scorch, create a buildup of residue on the resource, fracture the resource, or destroy the resource (Sturdevant, Skalsky, Wienk, & Dolan, 2009). Pile burning would only be conducted in areas that have had a cultural survey conducted, as determined via a cultural records search, or a site-specific survey of pile burn areas would be conducted to ensure avoidance of any cultural resources (CUL-3). Alternatively, pile burning would occur in a previously disturbed area such as a trail after inspection for the presence of cultural resources, depending on the location and previous use, as appropriate. 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 conducting the fuel reduction activities along roadways and structures would consume energy, including gas, diesel, and motor oil. Vehicle engines and fuel used during implementation of the proposed project would comply with State and local energy reduction and efficiency requirements. The use of fuel to implement the proposed 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 improve routes for evacuation in the Novato zone and create defensible space between communities and open space. Implementation of vegetation fuel reduction activities would not cause a

<sup>14</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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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 would occur mostly on existing paved roads but some roads may be gravel or dirt. Some soils in the area may be more susceptible to erosion and sensitive soils, such as serpentine soils, occur adjacent to minor portions of the work area. While the use of established unpaved roadways could result in erosion, impacts on any one area from travel would be limited due to minimal use, typically only a day or two.

Soil erosion and loss of topsoil could occur during manual and mechanical vegetation cutting and removal or winching of larger vegetation across the ground surface, which may expose 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 or dragging of vegetation 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). Pulling of large vegetation or dragging of large vegetation that could disturb the ground would not occur during rain events or when soils are saturated (GEO-3). Vegetation debris piles are localized and relatively small in size. Burn scars from pile burning would not be significant enough to result in increased soil erosion and topsoil loss. 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"/>

Vegetation thinning activities would involve manual and mechanical vegetation removal and pile burning within the fuel reduction zones. Greenhouse gas (GHG) emissions from pile burning would vary daily depending on the number of piles burned each workday. However, pile burns would have low GHG emissions compared to GHG emitted from catastrophic wildfires. Use of vehicles and equipment during these activities and vehicle travel to treatment areas would generate some GHG. Project activities would not generate significant quantities of GHG emissions<sup>15</sup>.

The proposed project would involve vegetation thinning and fire-hazardous, non-native plant species and would not remove any healthy, mature trees unless they were identified as hazardous. Thinning can result in greater sequestration rates by reducing competition for the

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<sup>15</sup> BAAQMD has established thresholds of significance for GHG emissions meant primarily for evaluating GHGs associated with land-use development or stationary-source projects, but the thresholds are not recommended for vegetation-management projects (Flores, 2020).

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larger, more resilient trees (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 ingress and egress is improved. The fluctuation would be insignificant compared to overall carbon stock in Marin County. Significant greenhouse gas 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"/>

Trucks, vehicles, and equipment are used for ongoing vegetation management throughout Marin County. Workers handling hazardous materials are required to adhere to Occupational Safety and Health Administration (OSHA) and Cal/OSHA health and safety requirements to protect workers and minimize risks of accidental spills of fuels and lubricants. As part of the proposed 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). The proposed project would comply with all herbicide regulations (HAZ-4), including the City of Novato Integrated Pest Management Policy and Program (2021) and the U.S. Environmental Protection Agency (EPA) Hazardous Materials Transportation Act, Federal Insecticide, Fungicide, and Rodenticide Act, and the Agricultural Worker Protection Standards (WPS). Herbicides prohibited by the EPA would not be applied, and the proposed project would comply with the requirements of the WPS to protect workers applying herbicides from occupational exposure. The proposed project would also require the minimization of herbicide drift to public areas, herbicide containers would be triple rinsed at an approved site, and signage would be placed in any herbicide application area within 500 feet of adjacent public recreation areas (HAZ-4). Off-road grading or other intense ground disturbance would not occur, ensuring that any potential existing contamination would not be disturbed and would not pose a risk to the environment or public. Pile burning, if conducted in the Marin Highlands area, would occur in areas of lowest risk for fire spread and under conditions to ensure control of the burn. Burning would only be performed with a burn permit by qualified personnel. Pile burning would adhere to all BAAQMD Regulation 5 Open Burning requirements. Work crews would maintain fire suppression equipment in work vehicles (HAZ-2). 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"/>

Work areas would be mostly accessed using existing paved roads adjacent to the work areas. Riparian woodlands are unlikely to be encountered but if encountered, 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 (SH-1). Herbicide mixing would occur away from waterways in areas devoid of vegetation, and only herbicides approved for use in aquatic environments would be applied by hand in riparian habitats (HYD-5). Hand pulling,

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particularly of invasive broom, could occur within the fuel reduction zone. 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; GEO-3). Burn piles would generally only be 4 feet in diameter and would not impact a large enough area to cause a significant change in stormwater runoff patterns that could result in sedimentation or siltation. Erosion and subsequent sedimentation of waterways would not occur. 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 treatment activities would not involve any new development or changes to land uses that could physically divide a community. The proposed project is consistent with Novato Ordinance 2019-2 Fire Code, the City of Novato General Plan 2035 (2020), 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.

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"/>

Fuel reduction activities would not result in the loss of availability of a known mineral resource because the work would occur within fuel reduction zones and along roadways and would not permanently alter any features. Vegetation clearance is intended to improve evacuation and ingress/egress and increase defensible space between communities and open space 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 activities would occur during 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>16</sup>, which limits construction activities and other related work to Monday through Friday 7:00 am to 6:00

<sup>16</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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pm and Saturday from 10:00 am to 5:00 pm for the City of Novato Noise Ordinance and weekdays 9:00 am to 5:00 pm for the Marin County Noise Ordinance. Work would progress along the roadways and fuel reduction zones, 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.

### 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 fuel reduction activities are anticipated to be sourced from existing contractor crews in the region. As such, this proposed 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 proposed 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 proposed project, and the proposed 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"/>

Treatments would occur within the Marin Highlands and Ignacio Valley open space areas mostly owned and managed by the City of Novato. Fuel reduction activities would be performed within up to 100 feet of structures generally. Treatment areas and trails that are accessible to the public may be closed for short durations during fuel reduction activities and pile burning for safety purposes. Some of the work areas are located near trails or fire roads where recreationalists could be located. Recreationalists trails would be unavailable if needed or flagged off during vegetation management activities, the treatments and pile burning would be for a short duration in one area, typically for only a few hours to a few days. Marin Highlands Park and playground may need to be closed for up to 2 days annually. Signs would be posted at each end of herbicide applications areas and any intersecting trails notifying the public of the use of herbicides in recreational areas (HAZ-5). Ample recreational opportunities are available within and surrounding the Novato Zone (e.g., Olompali State Historic Park, Indian Tree Open Space Preserve) that a few displaced recreationalists could use if discrete areas are unavailable due to vegetation management activities. The proposed project would

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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"/>

Multiple crews could conduct vegetation management activities within the fuel reduction zones and along evacuation routes in a single day. A single crew of up to 7 workers would likely be working at a single work area. An estimated 8 to 58 daily one-way vehicle trips would occur, which would not exceed the threshold of 110 trips per day<sup>17</sup>. The VMT associated with implementation of the proposed project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b). Pile burning could be conducted as a method of vegetative debris disposal in the Marin Highlands fuel reduction zone. Pile burns would be performed away from roadways and would not be a hazard to passing motorists or recreationalists due to the small size of the burns and monitoring during the burn. 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"/>

Biomass generated from vegetation removal activities may be processed using a chipper if pile burning is not used. 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 Marin Resource Recovery Center, which have a permitted capacity of 2,640 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"/>

The fuel reduction zones are within Local and State Responsibility Areas in moderate, high, and very high fire hazard severity zones (CAL FIRE, 2007/2008). The purpose of the proposed project is to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur and to provide defensible space for fire suppression crews to safely defend communities. Fuel reduction crews would maintain fire suppression equipment (e.g.,

<sup>17</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 proposed project.

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Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). The proposed project would not impair an adopted emergency response plan or evacuation plan. The proposed project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The proposed project does not involve intense ground disturbing activities that could result in downslope or downstream flooding or landslides should a wildfire occur.

Pile burning, if used for biomass processing in the Marin Highlands fuel reduction zone, would not exacerbate wildfire risk. Pile burning would occur in areas of lowest risk for fire spread. Piles would be relatively small in size and monitored by a qualified professional during the burn. Pile burning would be conducted by a qualified professional in accordance with the burn permit and standard industry practices including the California Forest Practice Rules, which would ensure that people and structures would not be exposed to significant risks. Impacts to people and structures from increased fire risk would not occur.

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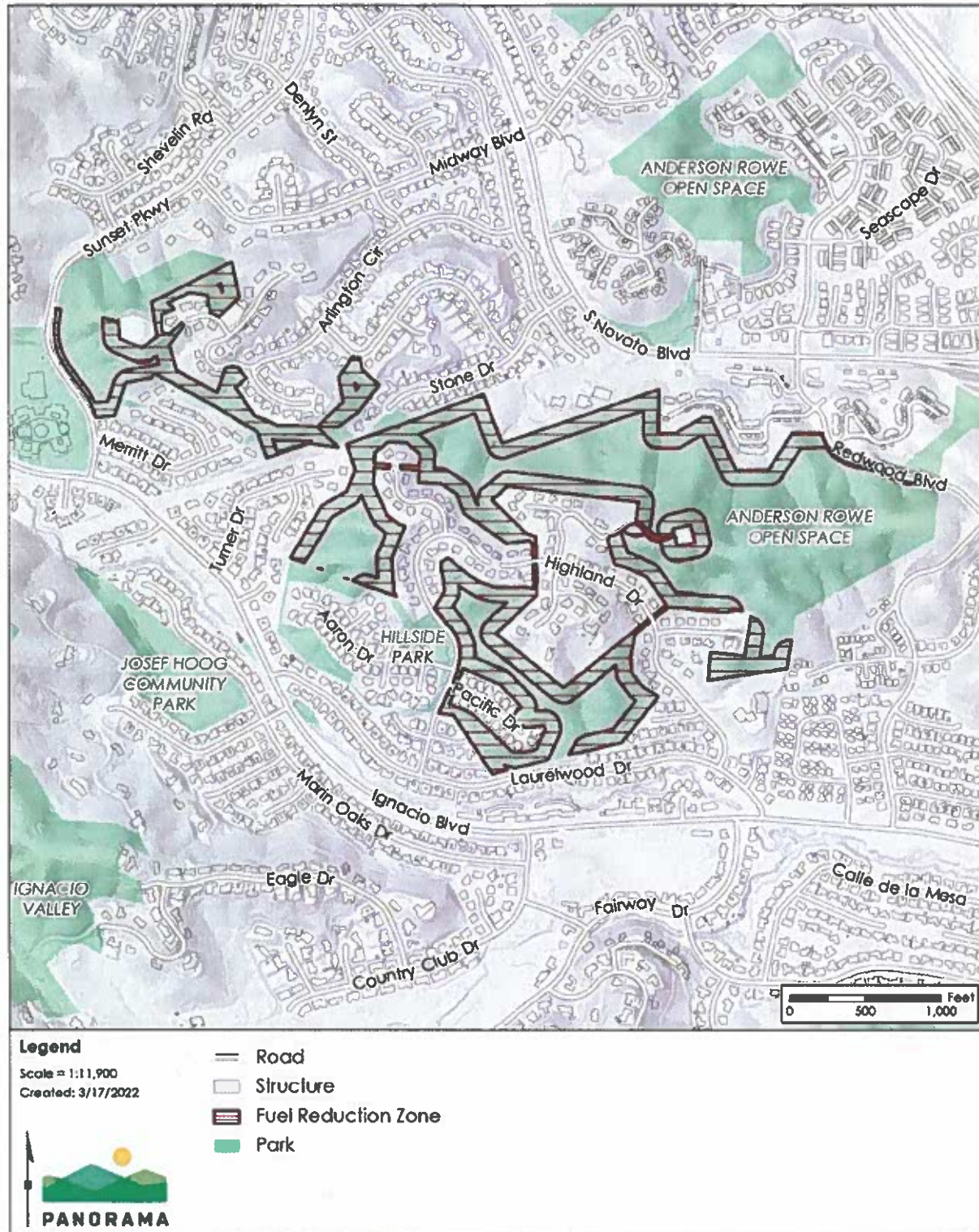
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Figure 2 Fuel Reduction Zones (Map 2 of 2)



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Figure 1 Fuel Reduction Zones (Map 1 of 2)

