Notice of Exemption

21-2021-129

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

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

From (Public Agency):
Marin County Fire Department
33 Castle Rock Avenue
Woodacre, CA 94973

FILED
JUL 21 2021
SHELLY SCOTT
MARIN COUNTY CLERK
BY: J. GILARDI, Deputy

Project Title: West Marin Zone Evacuation Route Core Project

Project Applicant: Marin County Fire Department

Project Location – Specific: Approximately 24.7 miles of prioritized roadways in Inverness, Tomales, Bolinas, Stinson, Nicasio, Point Reyes, Olema, and the San Geronimo Valley in west Marin County.

Project Location – City:
Western Marin Communities

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:
The purpose of the project is to improve routes for evacuation and ingress/egress throughout the communities in West Marin and comply with the Marin County Fire Code (Title 16 § 4908). Many of the communities and neighborhoods served by this project are registered Firewise[1] communities (FIRE Safe Marin, 2021). Creating fire adaptive communities is not only about reducing fire threat from fuel growth but also improving the safety of the residents. Creating safe evacuation routes is a critical component to long term fire adaptive strategy. The project would also increase access for local fire departments in the event of an approaching wildfire or initial attack on a wildfire, which would increase the likelihood that residences and the community as a whole can be protected.

Name of Public Agency Approving Project: Marin County Fire Department

Name of Person or Agency Carrying Out Project: Jordan Reeser

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));

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

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

☒ Categorical Exemption. State type and section number: Section 15304(i). Minor alterations to land for fuel management activities. Section 15301. Existing Facilities for vegetation removal on existing roadways.

☐ Statutory Exemptions. State code number:_____

Reasons why project is exempt:

The project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 Minor Alterations to Land and Section 15301, Class 1 Existing Facilities. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1 exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The project would involve vegetation trimming and removal along roads identified as key routes used for evacuation and ingress/egress in west Marin County. The scope of the project is consistent with a minor alteration to the condition of the vegetation along the routes and maintenance of the existing roadways. 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:	**Area Code/Telephone/Extension:**
Jordan Reeser	(415) 473-6566

If filed by applicant:

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

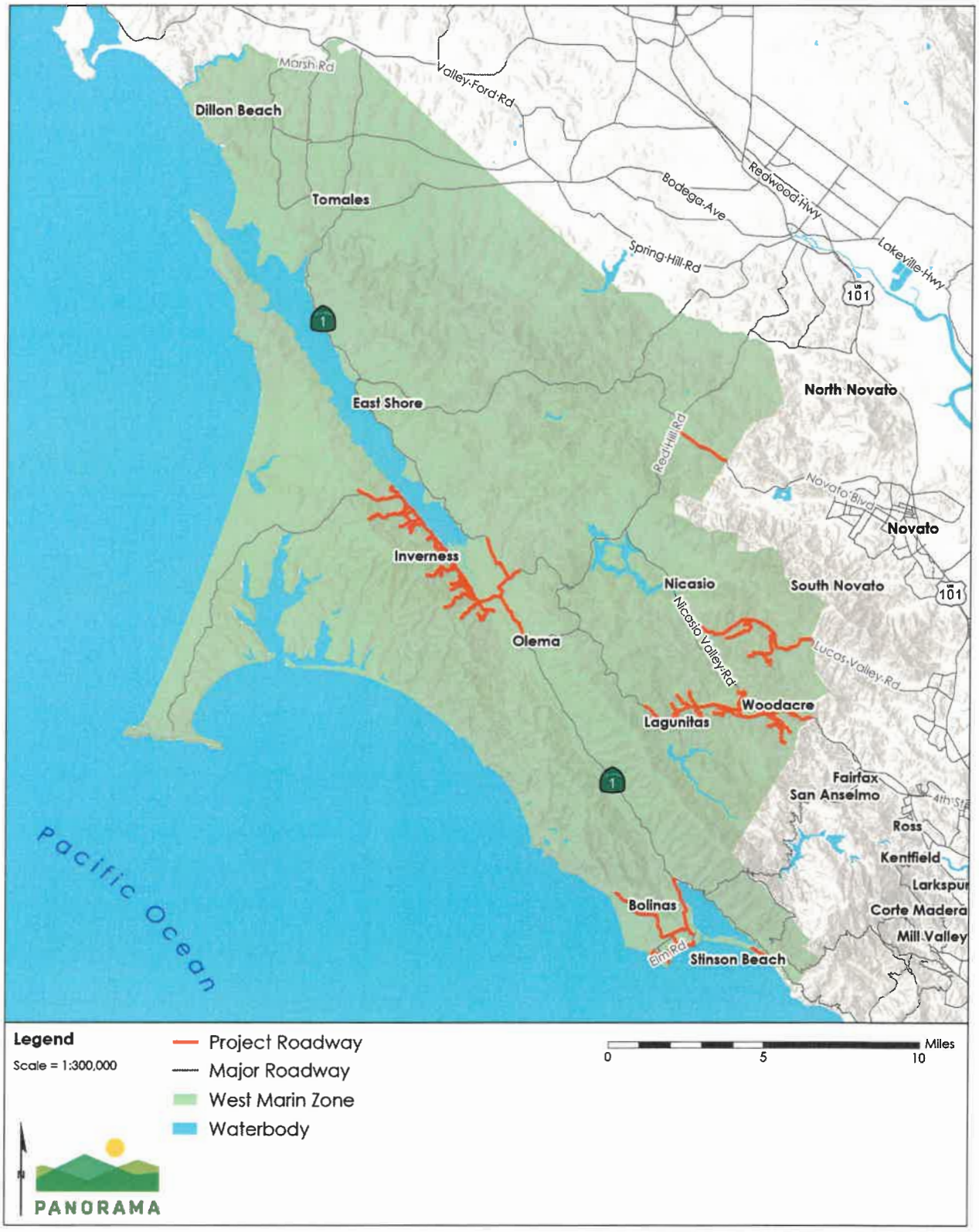
Signature:_____ Date: 7-19-21 Title: Fire Chief

☐ 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:
_____

Figure 1 Project Roadways



California Environmental Quality Act
Categorical Exemption Determination Memorandum

Date: July 15, 2021

Project: West Marin Zone Evacuation Route Core Project

Categorical Exemption Summary

The Marin Wildfire Prevention Authority (MWPA) has determined that the West Marin Zone Evacuation Route Core Project (project) is categorically exempt under the California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4, for Minor Alterations to Land and Section 15301, Class 1, for Existing Facilities. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1 exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The project would involve vegetation trimming and removal along roads identified as key routes used for evacuation and ingress/egress in west Marin County. The scope of the project is consistent with a minor alteration to the condition of the vegetation along the routes and maintenance of the existing roadways shown in Figure 1.

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

Information regarding the purpose and need for the project, a description of proposed activities, a discussion of why the exceptions to a categorical exemption for unusual circumstances do not apply, and an assessment of the potential for environmental effects, are provided below.

Background

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

detection, notification, and evacuation; vegetation management and fire hazard reduction; grants management; and public education.

Purpose and Need

The purpose of the project is to improve routes for evacuation and ingress/egress throughout the communities in West Marin and comply with the Marin County Fire Code (Title 16 § 4908). Many of the communities and neighborhoods served by this project are registered firewise[1] communities (FIRE Safe Marin, 2021). Creating fire adaptive communities is not only about reducing fire threat from fire growth but also improving the safety of the residents. Creating safe evacuation routes is a critical component to long term fire adaptive strategy. The project would also increase access for local fire departments in the event of an approaching wildfire or initial attack on a wildfire, which would increase the likelihood that residences and the community as a whole can be protected.

Project Description

Treatment

The proposed activities would be completed along prioritized roads in Inverness, Tomales, Bolinas, Stinson, Nicasio, Point Reyes, Olema, and the San Geronimo Valley in the West Marin Zone as shown in Figure 1. Vegetation along a total of 24.7 miles of roadways would be treated.

Treatment activities would involve vegetation removal up to 10 feet from the road edge and vertical vegetation thinning to a minimum of 15 feet to allow safe ingress and egress of emergency personnel and residents along the road without vegetation obstruction. Generally, treatments would target invasive, non-native, and fire-hazardous vegetation and accumulative dead biomass along the roads. Small trees, 8 inches diameter at breast height (DBH) and smaller, would be removed as part of clearance for ingress and egress and ladder fuel removal. Some individual hazard trees, as determined by a qualified arborist or registered professional forester (RPF), may be removed. No scenic, healthy, mature trees would be removed as part of the project. The same types of vegetation thinning along roadways have been implemented in past years on the same and nearby roads in the County to maintain ingress and egress.

Treatment Method

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

Manual and mechanical hand tools would be used for vegetation trimming and removal. Crews would remove vegetation from the ground and would utilize bucket trucks to achieve the necessary vertical clearance. The initial treatment would be aimed at creating a zone along the road corridors that would be easily maintained in the future with mechanized equipment, which is much safer and more cost efficient than hand labor. In some discrete locations where access is difficult or unsafe for workers, such as areas with dense poison oak, an excavator mounted mower may be used.

Disposal

A trailer-mounted chipper with the capacity to accept up to 12-inch diameter vegetation and a chipper truck would be at all work areas. An estimated 160 cubic yards of vegetative debris (equivalent to approximately 16 cubic yards of chips) would be generated per mile of road. Vegetative material would be fed into the chipper and the chipped material may be broadcast at work areas, where appropriate, or hauled away for disposal. Vegetation left at and spread on work areas would be chipped to less than 3 inches to minimize risk of fuel buildup and ignition. Disposal sites include West Marin Compost and Marin Resource Recovery Center.

Workers

Contractors and Marin County Fire Department (County Fire) crews would conduct the vegetation removal and chipping along the specified roadways. Each contractor crew would be comprised of 5 persons. No more than three contractor crews may be operating within the West Marin Zone but more typically only one or two crews would be working at one time. For treatments conducted by County Fire, one crew of 14 persons or a maximum of two crews of 28 persons may be deployed to a work area.

Site Access

Trucks and worker vehicles would be parked within existing roadways adjacent to the work areas. Lane or partial lane closures may be needed. Flagging and signage would be conducted in accordance with California Manual on Uniform Traffic Control Devices (MUTCD). The MUTCD requires the utilization of warning signs to alert motorists and other roadways users to the presence of roadside workers as well as flaggers to direct flow. The MUTCD also requires crew to wear safety equipment, such as high-visibility vests, when operating vehicles or equipment near public roads. Any lane closures would also require encroachment permits from the local jurisdiction within which the road is located.

Typically, equipment and vehicles would be staged at the contractor headquarters or County Fire equipment yards. Equipment and vehicles would not be left along roadways but may be staged at turnouts where safe to do so.

Schedule and Duration

Treatments along roadways would be conducted on weekdays from 8:30am to 4:30pm. Roadway vegetation thinning activities would require up to 45 workdays or less, depending

upon how many crews are operating simultaneously. Work would not be performed on Red Flag Warning days. Initial roadside treatments are anticipated to start July 2021 and be completed early 2022.

The project also includes the regular maintenance of the roadside vegetation on an on-going basis. Maintenance treatments would typically occur every 3 to 5 years in forested and coastal hardwood areas and every 2 to 3 years in brushier areas.

Project Design and Implementation Features

The MWPA has developed specific design and implementation features that will be incorporated as applicable into the project design and implementation for each of its projects. The following specific design and implementation measures are part of the project:

CUL-1 Training

For all activities with the potential for ground disturbance (excluding prescribed herbivory, vegetation and tree trimming, and hand pulling smaller vegetation) all contractors and construction personnel will receive training prepared by and/or conducted by a qualified cultural resources specialist prior to beginning construction. The training will address the potential for exposing subsurface resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified including reporting the resource to a qualified archaeologist or cultural resources specialist, 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

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

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

work area can only be accessed on foot as determined acceptable by the qualified cultural resource specialist/archaeologist.

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

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

ET-1 Environmental Training for Biological Resources

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

IP-1 Clean Equipment

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

IP-2 Prevent the Spread of Invasive Species and Plant Pathogens

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

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

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

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 construction to ensure that they are repaired and working as needed to prevent sediment transport into the waterbodies.

For areas with less than 50 percent ground cover:

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

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

HAZ-1 Leak Prevention and Spill Cleanup

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

- Proper disposal or management of contaminated soils and materials (i.e., clean up materials)
- Daily inspection of vehicles and equipment for leaks and spill containment procedures
- Emergency response and reporting procedures to address hazardous material releases
- Emergency spill supplies and equipment will be available to respond in a timely manner if an incident should occur

- Response materials such as oil-absorbent material, tarps, and storage drums will be available in the plan area at all times during management activities and will be used as needed to contain and control any minor releases
- The absorbent material will be removed promptly and disposed of properly
- Use of secondary containment and spill rags when fueling
- Discourage "topping-off" fuel tanks
- Workers using fuels or other hazardous materials must be knowledgeable of the specific procedures necessary for hazardous materials cleanup and emergency response

HAZ-2 Wildfire Risk Reduction

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

NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors

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

NSO-1 Northern Spotted Owl Nesting Season Avoidance

Within areas where northern spotted owl have the potential to occur, work, including mowing with heavy equipment, the mechanical removal of vegetation, or prescribed burning, including pile and broadcast burning, will occur outside of the northern spotted owl nesting season to the extent possible (February 1 to July 31).

If work must occur during the northern spotted owl nesting season, either NSO-02 or NSO-03 will apply.

NSO-2 Work During Northern Spotted Owl Nesting Season - Surveys

Within an area where northern spotted owl has the potential to occur, when work will occur during the northern spotted owl nesting season (February 2 through July 31), and work is not considered low-impact by a qualified biologist the following measure will apply. Low impact type activities include, but are not limited to, goat grazing, hand pulling of weeds, hand trimming of trees and vegetation with non mechanized equipment, chipping from existing roadways in residential areas, use of mechanized equipment adjacent to roads or in residential areas that is a typical noise for the environment.

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

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

biologist) during the nesting season if protocol surveys have determined that northern spotted owl nesting is not occurring in the area of planned activity.

2. If work must occur within 0.25 mile, a permit may be required from the US Fish and Wildlife Service before work can commence.

NB-1 Nesting Bird Season Avoidance

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through August 31st [2]. Not all species nest between the regulatory season, and active nests that are encountered year-round are protected.

NB-2 Nesting Bird Surveys

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

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

Nesting bird surveys will occur within no more than 7 days prior to construction 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

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-

[2] Note that the general nesting season between February 1 and August 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

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

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 Preconstruction Survey

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

RB-2 Avoidance of Maternity Roosts and Day Roosts

If active maternity roosts or day roosts are found within the project site, or in areas subject to disturbance from construction 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

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

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

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

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

RB-4 Bat Roosting Tree Removal – Emergency Removals

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

RR-1 Riparian Resources – Project Design

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

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

TR-1 Emergency Access to Project Areas

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

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 construction.
- Flaggers and/or construction warning signage of work ahead.
- A minimum of twelve (12) foot travel lanes on public roads must be maintained unless otherwise approved.
- Maintaining access to driveways and private roads at all times unless other arrangements have been made.
- Traffic control devices will be removed from view or covered when not in use.
- Sidewalks for pedestrians will remain open if safe for pedestrians. Alternate routes and signing will be provided if pedestrian routes are to be closed.
- Scheduling truck trips during non-peak hours to the extent feasible.

Discussion of Exceptions (Section 15300.2)

(a) Location:

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

Roadside vegetation treatments, similar to that proposed for this project, have occurred along the same roadways as the project in the past. Ongoing maintenance of the roadside vegetation along the project roadways would be limited to the types of activities previously described, which would be performed periodically to maintain ingress and egress. The visual character of project work areas would be modified each time vegetation treatments are implemented to maintain ingress and egress as vegetation regrows, due to reduction in vegetation cover and type (e.g., broom removal), but the natural character would remain and the treatments are not considered a visual degradation given the existing disturbance of the road. As such, the project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

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

The proposed vegetation thinning activities along roadways and future maintenance is considered routine and are prevalent and typical throughout the County and Bay Area region. Sensitive waterways and special-status species would be avoided. The project would modify the vegetation but the natural character would remain, and the aesthetic change would not be substantial. Therefore, there are no unusual circumstances associated with the project or the environment in which it would be implemented, and exception (c) does not apply.

(d) Scenic Highways:

State Route (SR) 1 is the nearest eligible California State Scenic Highway to the roadway work areas (Caltrans, 2021). Most roadways and proposed activities would not be visible from SR 1. For the discrete locations where project work areas may be visible, visual impacts from changes to the vegetation patterns from removal of small or hazard trees and shrubs in forested areas and weed removal within 10 feet along the roadways would occur. The natural characteristic of the area along the roadways would remain and significant adverse changes to the visual environment as seen from a scenic highway would not occur; therefore, exception (d) does not apply.

(e) Hazardous Waste Sites:

Per the current government database of hazardous waste sites at the time of this filing, no open hazardous waste sites are located adjacent to the work areas along the roadways.

Several closed sites are located in the vicinity of some of the roadways (SWRCB, 2021). No intense ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

(f) Historical Resources:

The project does not propose any intense ground-disturbing activities. Some hand pulling of invasive plants could occur. As part of the project, workers would participate in a cultural training prior to project implementation (CUL-1) and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided (CUL-2). 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?	☒	☐
Potential for significant impact?	☐	☒

The visual character along the specified roadways varies but is generally undeveloped with interspersed low density urbanized areas; primarily residential communities. Vegetation consists of densely forested mountain areas as well as grassy and chaparral-covered lowlands and hills. Many of the roads are near or overlooking the ocean or tidal waterways including the communities of Bolinas, Stinson Beach, and Inverness. Viewers in the vicinity of the work areas would primarily be motorists.

Equipment and trucks performing the work would be temporarily visible along these roadways. The roadways 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 limited areas within western Marin County 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 in forested areas as well as weed removal within 10 feet along the roadways. No healthy, mature, scenic trees would be removed as part of this project. The vegetative material may be chipped and left in place, or chipped and hauled away from the work area. Chipped material, if spread on site, would be visible during decomposition, but generally blends into the forest floor. Viewers in the immediate vicinity may notice changes in the density and type of the vegetation along the roadways. These methods of roadside vegetation thinning currently occur throughout Marin County to maintain ingress and egress. Views in the immediate foreground are also dominated by the man-made road itself and vegetation thinning along the edges of roadways would not be considered significant visual degradation. This type of work and vegetation management is

typical of the area and a characteristic part of the existing environment. The project would not degrade views from adjacent roadways because the visual change would be minimal, is typical in the area, and would only extend 10 feet from the roadway. The natural characteristic of the area around the roadways would remain. Significant adverse effects to aesthetics would not occur. Visual degradation as seen from State or locally designated scenic roads or vistas, including the Marin County ridge and upland greenbelt areas, would not occur.

Agriculture and Forestry Resources		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

The proposed roadside vegetation thinning activities would not convert designated farmland to non-agricultural uses. Project activities would occur within 10 feet of roadways and as such would not result in the loss of forest land nor would it convert forestry land to non-forestry use. Adverse effects on agriculture and forestry resources would not occur.

Air Quality		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vehicles and equipment for the roadside vegetation thinning activities would emit diesel particulate matter and criteria air pollutants. In a given day, it is assumed that a bucket truck, chainsaws or other mechanical hand tools, and a chipper would operate for a few hours per crew and up to one off-haul truck would travel to a green waste disposal center. Activities would be conducted for up to 45 days a year, which would not result in generation of air emissions in excess of Bay Area Air Quality Management District (BAAQMD) significance thresholds (CAPCOA, 2021). No tilling or grading activities that could generate fugitive dust emissions would occur. Significant air quality impacts would not occur.

Biological Resources		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Biological database searches for the vicinity of the roadways were conducted (CDFW, 2021; CNPS, 2021). Of the species identified during the database search, species were determined to have potential to occur within the roadside 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

Due to the type of project and extent of the vegetation treatment activities out to 10 feet along roadways, serpentine and wetland habitats are not anticipated to be encountered or treated, and special-status species found in these areas would not be encountered. Riparian habitat may occur along road edges. Vegetation trimming and removal would be conducted by hand to remove fuel loading and allow safe ingress and egress (RR-1). Vegetation proposed for removal would not be ecologically significant to special-status plants or animals.

Workers would receive training from a qualified professional prior to beginning the roadside vegetation treatments where sensitive biological resources could occur in the work areas, which would include identification of special-status plant species and avoidance or, as appropriate, training for species-specific protocols for work, such as trimming methods (ET-1). The training for this project would involve identification of congested-headed hayfield tarplant, woolly-headed spineflower, Mt. Vision ceanothus, Sonoma spineflower, Marin manzanita, Marin checker lily, western leatherwood, San Francisco owl's-clover, two-fork clover, and marsh microseris for avoidance if encountered along the roadways. The vegetation trimming and removal would generally focus on removing invasive and fire-hazardous species, leaving native species in place (IP-4). Workers would clean equipment and handle vegetation to avoid spreading invasive species and plant pathogens (IP-1, IP-2, IP-3). All sensitive plant species have a low to no potential to be impacted by roadside vegetation removal activities 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 or high potential to occur along the project roadways. Project activities would generally be conducted August to February avoiding nesting birds and roosting bats. If activities must occur from February to August appropriate nesting bird and/or bat surveys would be conducted (NSO-1, NSO-2, NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4). Training would include identification for avoidance of sensitive communities that provide habitats for several special-status species, such as wetlands. Training would also identify host plants for the monarch for avoidance (ET-1). Due to the scale and scope of the roadside vegetation treatments, the western bumble bee and monarch would not be adversely affected as these species are mobile and could move away from any danger posed by equipment or humans. Substantial thinning of eucalyptus groves would not occur as activities would occur within 10 feet of the roadway. Burrowing owl, northern spotted owl, or yellow warbler also would not be impacted since work would occur outside nesting season or surveys conducted and nests avoided. All wildlife species reviewed had a low potential for impacts from roadside vegetation clearance activities as shown in Table 1.

Critical habitat for marbled murrelet, northern spotted owl, and tidewater goby occurs within or adjacent to the work areas (USFS, 2021; NOAA, 2021). Vegetation treatment and removal would target invasive, non-native, and fire-hazardous vegetation and accumulative dead biomass along the roads. Individual mature trees may be removed if they pose a hazard, but

generally small trees, 8 inches DBH and smaller, would be removed as part of clearance for ingress and egress and ladder fuel removal. This vegetation would grow back and be retreated as needed. Given the work would be conducted in very close proximity to roads and focused on removal of hazardous fuels near roads, the work would not be considered habitat alteration. Significant impacts on special-status wildlife species would not occur.

Wetlands

Seasonal streams intersect or occur adjacent to the project roadways (USFWS, 2021). Existing infrastructure including culverts would not be altered as part of the project. Streams would be avoided by project activities. Due to the type of project and extent of the vegetation treatment activities out to 10 feet along roadways, wetlands are not anticipated to be encountered and no activities would occur in wetlands. Training would ensure that workers avoid wetlands (ET-1). Significant impacts on wetlands would not occur.

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

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Sensitive Plants					
Abronia umbellata var. breviflora	pink sand-verbena	CNPS 1B.1	Coastal dunes and scrub, disturbed sandy areas	Low	Low – not likely to be encountered
Agrostis blasdalei	Blasdale's bent grass	CNPS 1B.2	Dunes, coastal bluffs and scrub	Low	Low – not likely to be encountered
Amorpha californica var. napensis	Napa false indigo	CNPS 1B.2	Wetland, Riparian woodland	Low	Low – not likely to be encountered
Amsinckia lunaris	bent-flowered fiddleneck	CNPS 1B.2	Grassland, serpentine, gravelly slopes	Low	Low – not likely to be encountered
Arctostaphylos montana ssp.montana	Mt. Tamalpais manzanita	CNPS 1B.3	Chaparral, Valley Grassland	Low	Low – not likely to be encountered
Arctostaphylos virgata	Marin manzanita	CNPS 1B.2	Closed-cone Pine Forest, Redwood Forest, Mixed Evergreen Forest, Chaparral	Moderate, species is known to occur in project area north of Inverness	Low – can be identified and avoided with training
Astragalus pycnostachyus var. pycnostachyus	coastal marsh milk-vetch	CNPS 1B.2	Coastal marshes, seeps	Moderate, species occurs in project area near Stinson Beach, but is likely to be found near marsh not along roadside	Low – suitable habitat would be avoided
Blennosperma nanum var. robustum	Point Reyes blennosperma	CR, CNPS 1B.2	Sandy bluffs, wetlands	Low	Low – not likely to be encountered
Calamagrostis crassiglumis	Thurber's reed grass	CNPS 2B.1	Slopes, meadows, coastal marshes	Low	Low – not likely to be encountered
Campanula californica	swamp harebell	CNPS 1B.2	Freshwater marshes	Moderate, species known to occur in	Low – suitable habitat would be avoided

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
				project area near Inverness	
Carex leptalea	bristle-stalked sedge	CNPS 2B.2	Wet meadows, swamps	Low	Low – suitable habitat would be avoided
Carex lyngbyei	Lyngbyei's sedge	CNPS 2B.2	Coastal, salt marshes	Low	Low – suitable habitat would be avoided
Castilleja ambigua var. humboldtiensis	Humboldt Bay owl's clover	CNPS 1B.2	Salt-marsh wetlands, coastal	Low to Moderate, species occurs near project area east of Kent Lake	Low – suitable habitat would be avoided
Ceanothus gloriosus var. porrectus	Mt. Vision ceanothus	CNPS 1B.3	Coastal bluffs, scrub, closed-cone pine forest	Moderate; species known to occur in project area south of Inverness	Low – can be identified and avoided with training
Ceanothus masonii	Mason's ceanothus	CR, CNPS 1B.2	Chaparral	Low	Low – not likely to be encountered
Chloropyron maritimum ssp. palustre	Point Reyes salty bird's-beak	CNPS 1B.2	Coastal salt marsh	Low, species occurs in project area west of Bolinas Lagoon	Low – suitable habitat would be avoided
Chorizanthe cuspidata var. villosa	woolly-headed spineflower	CNPS 1B.2	Coastal prairie, sand	Moderate	Low – can be identified and avoided with training
Chorizanthe valida	Sonoma spineflower	FE, CE, CNPS 1B.1	Coastal prairie, sand	Moderate, species known to occur in project area west of Inverness, but highly unlikely to occur in the disturbed areas adjacent to roadways	Low – not likely to be encountered along roadways, can be identified and avoided with training
Cicuta maculata var. bolanderi	Bolander's water-hemlock	CNPS 2B.1	Coastal wetlands	Low	Low – suitable habitat would be avoided

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Cirsium andrewsii	Franciscan thistle	CNPS 1B.2	Bluffs, seeps, occasionally serpentine	Low	Low – not likely to be encountered, project activities would be low risk
Cirsium hydrophilum var. vaseyi	Mt. Tamalpais thistle	CNPS 1B.2	Serpentine seeps	Low	Low – suitable habitat would be avoided
Dirca occidentalis	western leatherwood	CNPS 1B.2	Riparian	Moderate, species occurs in project area south of Inverness	Low – can be identified and avoided with training
Entosthodon kochii	Koch's cord moss	CNPS 1B.3	Riverbanks on newly exposed soil	None, riverbanks avoided by project design	None
Eriogonum luteolum var. caninum	Tiburon buckwheat	CNPS 1B.2	Chaparral, Coastal Prairie, Valley Grassland	Low	Low – not likely to be encountered
Erysimum concinnum	bluff wallflower	CNPS 1B.2	Cliffs, coastal bluffs, dunes, prairies	Low	Low – not likely to be encountered
Fissidens pauperculus	minute pocket moss	CNPS 1B.2	Seasonally moist hard-packet soils on steep faces, gullies, or cut banks	Low	Low – not likely to be encountered
Fritillaria lanceolata var. tristulis	Marin checker lily	CNPS 1B.1	Oak or pine scrub, grassland	Moderate; species is known to occur in project area near Inverness	Low – can be identified and avoided with training
Fritillaria liliacea	fragrant fritillary	CNPS 1B.2	Heavy soil, open hills, fields near coast	Low	Low – not likely to be encountered
Gilia millefoliata	dark-eyed gilia	CNPS 1B.2	Coastal dunes	Low	Low – not likely to be encountered
Hemizonia congesta spp. congesta	congested-headed hayfield tarweed	CNPS 1B.2	Northern Coastal Scrub, Valley Grassland	Moderate to High, species occurs in project area east of Kent Lake, and known	Low – can be identified and avoided with training

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
				to occur along roadsides	
Hesperevax sparsiflora var. brevifolia	short-leaved evax	CNPS 1B.2	Coastal dunes and bluffs	Low	Low – not likely to be encountered
Hesperolinon congestum	Marin western flax	FT, CT, CNPS 1B.1	Serpentine, grassland	Low	Low – not likely to be encountered
Heteranthera dubia	water star-grass	CNPS 2B.2	Wetland	Low	Low – suitable habitat would be avoided
Holocarpha macradenia	Santa Cruz tarplant	FT, CE, CNPS 1B.1	Grassy areas, clay soil	Low	Low – not likely to be encountered
Horkelia cuneata var. sericea	Kellogg's horkelia	CNPS 1B.1	Coastal sandhills, old dunes	Low	Low – not likely to be encountered
Horkelia marinensis	Point Reyes horkelia	CNPS 1B.2	Coastal dunes	Low	Low – not likely to be encountered
Horkelia tenuiloba	thin-lobed horkelia	CNPS 1B.2	Open chaparral	Low	Low – not likely to be encountered
Hypogymnia schizidiata	island tube lichen	CNPS 1B.3	Grows on bark and wood of hardwoods and conifers in woodlands, isolated groves, and forests	Low	Low – not likely to be encountered
Kopsiopsis hookeri	small groundcone	CNPS 2B.3	Open woodland, mixed conifer forest	Low	Low – not likely to be encountered
Lasthenia californica ssp. macrantha	perennial goldfields	CNPS 1B.2	Grassland, dunes	Low	Low – not likely to be encountered
Leptosiphon rosaceus	rose leptosiphon	CNPS 1B.1	Open grassy slopes, coastal bluffs	Low	Low – not likely to be encountered
Lessingia micradenia var. micradenia	Tamalpais lessingia	CNPS 1B.2	Thin, gravelly soil of serpentine outcrops, roadcuts	Low, serpentine outcrops will be avoided	Low – suitable habitat would be avoided

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Microseris paludosa	marsh microseris	CNPS 1B.2	Moist grassland, open woodland	Moderate, species occurs in project area west of Bolinas Lagoon	Low – can be identified and avoided with training
Mielichhoferia elongata	elongate copper moss	CNPS 4.3	Rock, mineral enriched substrates	Low	Low – suitable habitat would be avoided
Navarretia rosulata	Marin County navarretia	CNPS 1B.2	Rocky, serpentine	Low	Low – suitable habitat would be avoided
Pleuropogon hooverianus	North Coast semaphore grass	CT, CNPS 1B.1	Meadows, vernal-pools	Low; meadows and vernal pools will be avoided by project design	Low – suitable habitat would be avoided
Polygonum marinense	Marin knotweed	CNPS 3.1	Coastal salt, brackish marshes, swamps	Low	Low – suitable habitat would be avoided
Quercus parvula var. tamalpaisensis	Tamalpais oak	CNPS 1B.3	Understory conifer woodland	Low	Low – not likely to be encountered
Sidalcea calycosa ssp. rhizomata	Point Reyes checkerbloom	CNPS 1B.2	Marshes	Low	Low – suitable habitat would be avoided
Silene scouleri ssp. scouleri	Scouler's catchfly	CNPS 2B.2	Rocky slopes, coastal bluffs	Low	Low – not likely to be encountered
Stebbinsoseris decipiens	Santa Cruz microseris	CNPS 1B.2	Open coastal, serpentine, sandy	Low	Low – not likely to be encountered
Streptanthus batrachopus	Tamalpais jewelflower	CNPS 1B.3	Serpentine barrens, chaparral	Low	Low – suitable habitat would be avoided
Streptanthus glandulosus ssp. pulchellus	Mt. Tamalpais bristly jewelflower	CNPS 1B.2	Chaparral, Valley Grassland	Low	Low – not likely to be encountered

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Trifolium amoenum	two-fork clover	FE, CNPS 1B.1	Moist, heavy soils, disturbed areas	Moderate; species occurs in project area near Stinson Beach	Low – can be identified and avoided with training
Trifolium polyodon	Pacific Grove clover	CR, CNPS 1B.1	Meadows, closed-cone pine forest	Low	Low – not likely to be encountered
Triphysaria floribunda	San Francisco owl's-clover	CNPS 1B.2	Coastal grassland, serpentine slopes	Moderate; species known to occur in project area near Inverness	Low – can be identified and avoided with training
Sensitive Wildlife					
Falco peregrinus anatum	American peregrine falcon	FP	Nests on cliff ledge or hollow of broken tree snag, also uses ledges of buildings or other structures	Low	Low – not likely to be encountered
Cypseloides niger	black swift	SSC	Nests on ledges or in crevices in steep cliffs along coast or near streams or waterfalls in mountains	Low, species occurs in project area near Stinson Beach	Low – not likely to be encountered
Athene cunicularia	burrowing owl	SSC	Nests in grassland burrows	Moderate	Low – work would occur outside nesting season or surveys conducted
Laterallus jamaicensis coturniculus	California black rail	FT, FP	Wetlands and marshes	Low	Low – not likely to be encountered along roadways, suitable habitat would be avoided
Syncaris pacifica	California freshwater shrimp	FE, CE	Perennial freshwater streams with submerged undercut banks, overhanging plants, and exposed live roots of willow or alder	None, Wetland species	None

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Dicamptodon ensatus	California giant salamander	SSC	Wet coastal forests, such as coastal redwoods, in or near clear, cold permanent and semi-permanent streams and seepages	Low to moderate, may use roadside as dispersal or foraging	Low – can disperse from other areas, suitable breeding habitat would be avoided
Rana draytonii	California red-legged frog	FT, SSC	Breeds in ponds/slow moving streams, may use grassland and oak woodland for dispersal and foraging	Low to moderate, may use roadside as dispersal or foraging	Low – can disperse from other areas, suitable breeding habitat would be avoided
Rallus obsoletus obsoletus	California Ridgway's rail	FE, CE, FP	Wetlands and marshes	Low to moderate, species occurs in project area near Bolinas	Low – can disperse from other areas, suitable habitat would be avoided
Oncorhynchus kisutch pop. 4	coho salmon - central California coast ESU	FE, CE	Aquatic	None, aquatic species	None
Rana boylii	foothill yellow-legged frog	CE, SSC	Rocky streams in a variety of habitats, including habitats such as valley foothill hardwood, valley-foothill riparian, coastal scrub, mixed conifer, mixed chaparral, and wet meadows	Low to moderate, species occurs in project area near Bolinas	Low – can disperse from other areas, suitable breeding habitat would be avoided
Spirinchus thaleichthys	longfin smelt	FC, CT	Aquatic	None, aquatic species	None
Brachyramphus marmoratus	marbled murrelet	FT, CE	Breeds inland on mountains near coast	Low, critical habitat present in project area, but no occurrences recorded	Low – not likely to be encountered

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Danaus plexippus pop. 1	monarch - California overwintering population	FC	Grassland, woodland	Low to moderate, species occurs in project area near Bolinas	Low – not likely to be encountered, work would not substantially thin eucalyptus groves, host plants can be identified and avoided with training
Speyeria zerene myrtleae	Myrtle's silverspot butterfly	FE	Coastal dunes, scrub and grassland	Low	Low – not likely to be encountered
Circus hudsonius	northern harrier	SSC	Marshes, fields, prairies. Nests on ground in dense field or marsh	Low	Low – not likely to be encountered, suitable habitat would be avoided
Strix occidentalis caurina	northern spotted owl	FT, CT	Dense canopies of mature and old-growth forests. Nests in tree hollows	High	Low – work would occur outside nesting season or surveys conducted, nests not likely to occur in close proximity to roads and removal would focus on small trees and hazardous fuels
Antrozous pallidus	pallid bat	SSC	Roosts in large diameter trees and abandoned buildings	Low to moderate - there is some potentially suitable trees within or nearby the project area	Low – work would occur outside the bat maternity roosting period or surveys conducted
Zapus trinolatus orarius	Point Reyes jumping mouse	SSC	Wet, marshy coastal meadows	None, wetland species	None
Aplodontia rufa phaea	Point Reyes mountain beaver	SSC	Lives in underground burrows in north-facing slopes in moderately dense coastal scrub	Moderate, habitat present in project area	Low – not likely to be encountered, project activities would be low risk
Oncorhynchus mykiss irideus pop. 8	steelhead - central California coast DPS	FT	Aquatic	None, aquatic species	None

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments
Eucyclogobius newberryi	tidewater goby	FE	Aquatic	None, aquatic species	None
Lavinia symmetricus ssp. 2	Tomales roach	SSC	Aquatic	None, aquatic species	None
Corynorhinus townsendii	Townsend's big-eared bat	SSC	Caves, mines, bridges, building, rock crevices, tree hollows in coastal lowlands, and cultivated valleys; prefer roosting in caves or other similar open spaces	Low	Low– work would occur outside the bat maternity roosting period or surveys conducted
Bombus occidentalis	western bumble bee	CC	Grassland	Moderate	Low – type of work not likely to affect bumble bee, which can disperse
Emys marmorata	western pond turtle	SSC	Freshwater ponds and streams	None	None
Lasiurus blossevillii	western red bat	SSC	Edge habitats. Roosts in trees, generally in the open on in leaf litter in winter	Low	Low– work would occur outside the bat maternity roosting period or surveys conducted
Charadrius nivosus nivosus	western snowy plover	FT, SSC	Nests in coastal dunes	None, nests in coastal dunes	None
Coturnicops noveboracensis	yellow rail	SSC	Grassy marshes, meadows. Nests in shallow cup with concealing plants above it, in shallow part of marsh or on damp soil	None, wetland species	None
Setophaga petechia	yellow warbler	SSC	Bushes, swamp edges, streams, gardens. Nests places in upright fork of branches in shrubs, small trees, and briars	Moderate	Low – work would occur outside nesting season or surveys conducted

Notes:

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatments

Species with occurrences within 3 miles of treatment area were examined. Species which are considered "extirpated" or those with occurrence data greater than 75 years old were removed from the analysis as they are not anticipated to occur in the vicinity of the treatment area.

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		

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

Cultural Resources and Tribal Cultural Resources[3]		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Equipment and vehicles for the roadside vegetation thinning activities would operate from existing roadways. No intense ground disturbing activities would occur nor would off-road equipment use. While some hand pulling of invasive species may occur, the potential to disturb cultural resources is low since this work results in little to no new ground disturbance. Workers would participate in a cultural training prior to project implementation (CUL-1) and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided conducted (CUL-2). Significant impacts on cultural resources and human remains would not occur.

Energy		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

The vehicles and equipment conducting the roadside vegetation thinning activities would consume energy, including gas, diesel, and motor oil. Vehicle engines and fuel used during implementation of the project would comply with State and local energy reduction and efficiency requirements. The use of fuel to implement the project would be minimal and the proposed fuel consumption would, additionally, be considered beneficial and not wasteful given the positive outcome of the work to improve routes for evacuation and ingress/egress. Implementation of roadside vegetation thinning would not cause a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Geology and Soils		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vehicle travel and operation of equipment would occur on existing roads. Most roads are paved but some roads may be gravel or dirt. While the use of established unpaved roadways

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

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

Greenhouse Gas Emissions		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vegetation thinning activities would involve manual and mechanical vegetation removal along roadways. Use of vehicles and equipment during these activities and vehicle travel to project sites would generate some greenhouse gas (GHG) emissions, but not in significant quantities due to the limited duration and types of activities[4]. The project would involve vegetation thinning and would not typically remove any healthy, mature trees. Thinning can result in greater sequestration rates by reducing competition for the 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?	☒	☐
Potential for significant impact?	☐	☒

[4] BAAQMD has established thresholds of significance for GHG emissions meant primarily for evaluating GHGs associated with land-use development or stationary-source projects and are not recommended for vegetation-management projects (Flores, 2020).

Trucks, vehicles, and equipment are used for ongoing vegetation management along Marin County roadways. Vehicle and equipment use at work areas and vehicle travel to and from work areas could result in a minimal risk of accidental spills of fuels or lubricants from these vehicles. Workers handling hazardous materials are required to adhere to OSHA and Cal/OSHA health and safety requirements to protect workers. As part of the project, spill prevention and response measures would be implemented that would ensure that hazardous materials are properly stored on-site and that any accidental releases of hazardous materials would be properly controlled and quickly cleaned up (HAZ-1). Off-road grading or other intense ground disturbance would not occur, ensuring that any potential existing contamination would not be disturbed and would not pose a risk to the environment or public. Vegetation management crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). Significant impacts related to hazards and hazardous materials would not occur.

Hydrology and Water Quality		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vehicles and tracked equipment would be confined to existing roads. Any streams or riparian areas that may intersect with the project roadways would be avoided. Riparian woodlands may be encountered but any vegetation trimming or thinning would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (RR-1). Some hand pulling could occur, such as removal of invasive broom within 10 feet of roadways. No intense ground disturbance such as grading or off-road equipment use would occur. Generally, soil-disturbing work resulting in groundcover of less than 70 percent and 100 feet or less upslope of a waterway or riparian corridor could have some potential to cause more substantial sedimentation of the waterway or habitat (Lang & McDonald, 2005). The majority of the proposed manual and mechanical vegetation removal activities would not result in circumstances that would result in significant ground cover removal and, thus, significant erosion and subsequent sedimentation. For the rare instances where erosion could occur, erosion control measures would be implemented (GEO-1). Significant water quality impacts would not occur.

Land Use and Planning		
Question	**Yes**	**No**
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

Implementation of roadside vegetation thinning would not involve any new development or changes to land uses that could physically divide a community. The project is consistent with

the objectives of the Marin Wildfire Prevention Authority, Marin County Fire Code, and the Marin County Community Wildfire Protection Plan (2020). All activities conducted would comply with local land use regulations and policies.

Mineral Resources		
Question	**Yes**	**No**
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

Vegetation removal activities would not result in the loss of availability of a known mineral resource because the work would occur along and within 10 feet of existing roadways and would not permanently alter any features. Roadside vegetation clearance is intended to allow evacuation and ingress/egress and would not alter land uses, access, or subsurface areas that could impact mineral resources.

Noise		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

The proposed vegetation thinning activities would occur weekdays from 8:30am to 4:30pm. This timeframe would conform with the Marin County Noise Ordinance § 6.70.030(5)[5], which limits construction activities and other related work to Monday through Friday 7:00am to 6:00pm and Saturday from 9:00am to 5:00pm. Work would progress along the roadway, limiting noise in any one location to a few hours. The type of noise is not uncommon in the built environment. Measures to minimize noise disruption to nearby neighbors and sensitive receptors 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?	☐	☒
Potential for significant impact?	☐	☒

[5] 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_{max} at 50 feet (USDOT, 2008) such that a comparison could be made and justification for ensuring work hours conform.

The workers implementing the roadside vegetation clearance are anticipated to be sourced from the existing contractor businesses in the region or the existing crews at County Fire. County Fire crews would only be deployed to conduct the vegetation clearance if they are available. No new County Fire staff would be hired as part of this project. As such, this project would not induce population growth. No impact related to population and housing would occur.

Public Services		
Question	**Yes**	**No**
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

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

Recreation		
Question	**Yes**	**No**
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

Vegetation removal activities would be conducted along and within 10 feet of existing roadways and would not affect recreational facilities. The project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

Transportation		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Daily one-way vehicle trips would be range from 14 to 64 (2 to 8 average daily trips over the whole year), depending upon the number of crews operating and would not exceed screening

threshold of 110 trips per day[6]. The VMT associated with implementation of the project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b).

Vegetation removal activities may require a partial or full lane closure to ensure crews have adequate buffer from passing vehicles. Contractors would acquire an encroachment permit from the County for work on the roadway. Lane closures could also slow or impede emergency access and responders. Notification or emergency response agencies and traffic control measures would be implemented including compliance with the latest Manual on Uniform Traffic Control Devices (MUTCD) (TR-1 and TR-2). The MUTCD requires crews to wear safety equipment, such as high-visibility vests, when operating vehicles or equipment near public roads and use of flaggers and signage. No significant traffic impacts would occur.

Utilities and Service Systems		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Biomass generated from vegetation removal activities would be processed using a chipper. Some materials may be spread on the work areas. Less than 16 cubic yards (estimated at 20 to 23 tons) of chipped material would be generated a day for a total of 395 cubic yards (estimated at 495 to 550 tons) over the course of the first year of project implementation. As the vegetation grows back and follow up maintenance is conducted in future years, additional vegetative materials would be chipped and trucked away. Materials would be trucked to West Marin Compost and Marin Resource Recovery Center, which have a permitted capacity of over 2,670 tons per day and would be able to accept the chipped material (CalRecycle, 2021). Any waste generated by the workers, such as spent vehicle batteries or refuse would be properly disposed of at the appropriate facility. No impact related to utilities and service systems would occur.

Wildfire		
Question	**Yes**	**No**
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

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

Most of the roadways identified for vegetation clearance and maintenance are within the State Responsibility Area (SRA) and some are within areas identified as very high fire hazard severity zones (CAL FIRE, 2007/2008). The purpose of the project is to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur. As discussed previously, emergency access would be maintained and the project would not impair an adopted emergency response plan or evacuation plan, but would rather enhance evacuation. The project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The project does not involve intense ground disturbing activities or off-road vehicle use that could result in downslope or downstream flooding or landslides should a wildfire occur.

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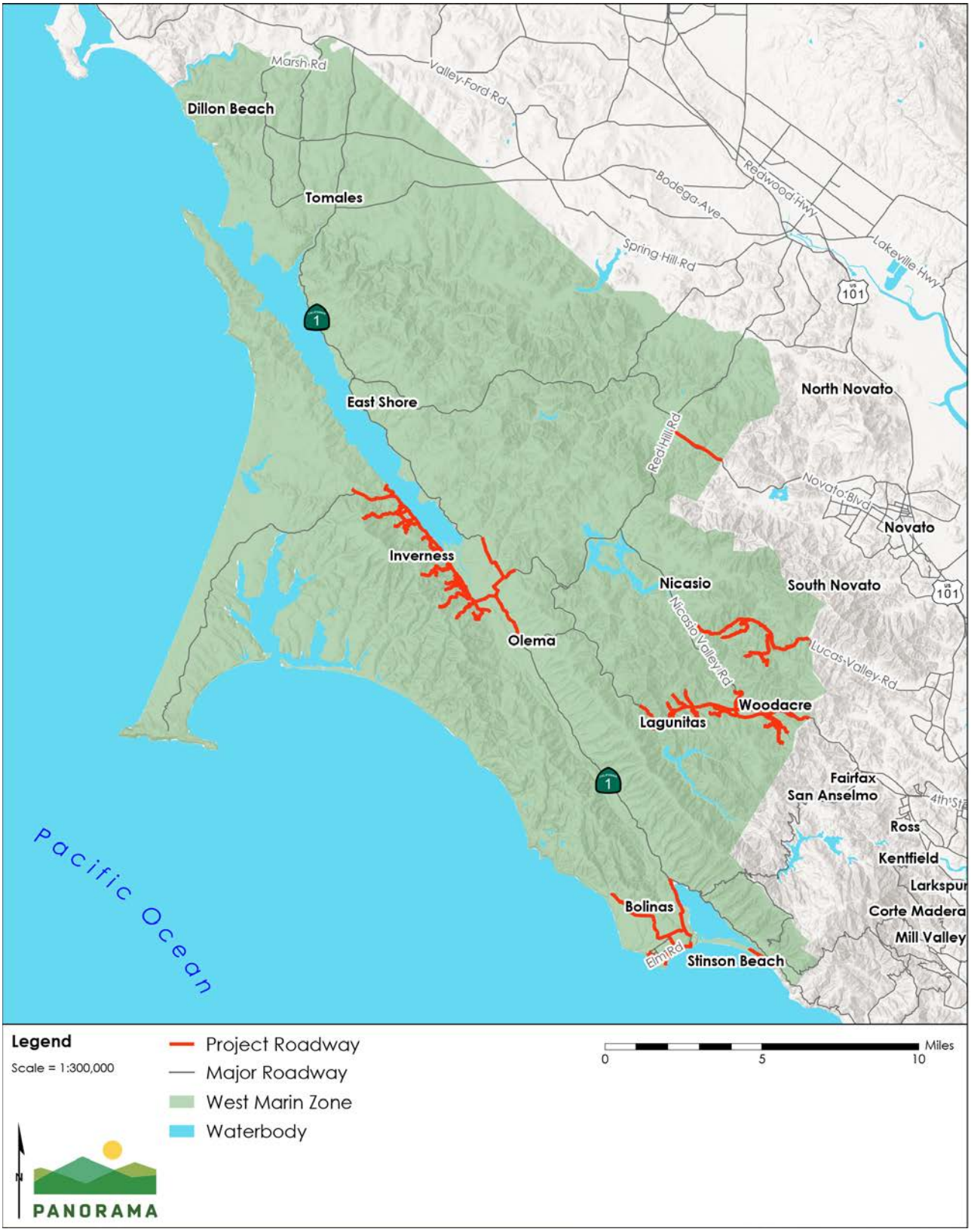
Figure 1 Project Roadways