Notice of Exemption

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):
Southern Marin Fire District
28 Liberty Ship Way
Sausalito, CA 94965

Project Title: Southern Marin Zone SMFD Fuel Break Project

Project Applicant: Southern Marin Fire District (SMFD)

Project Location – Specific: The proposed project is a fuel break along highway 101 in the City of Sausalito and unincorporated Marin County.

Project Location – City:
The City of Sausalito, CA 94965

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:

The purpose of the proposed project is to establish and maintain a defensible space zone along the perimeter of the City of Sausalito residential hillside communities between homes and open space areas. These communities are located on steep slopes, where a wildfire, if ignited, would rapidly escalate, and fire suppression activities would be challenging due to limited road access. By creating a fuel break, the proposed project would slow wildfire spread, reduce wildfire intensity, extend the time residents would have to evacuate, and provide firefighters better access to the fire's edge if a wildfire were to occur.

Name of Public Agency Approving Project: SMFD

Name of Person or Agency Carrying Out Project: SMFD

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.
- ☐ Statutory Exemptions. State code number:_____

Reasons why project is exempt:
The Southern Marin Fire District (SMFD) has determined that the Southern Marin Zone SMFD Fuelbreak Project (project) is categorically exempt under the California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4, for Minor Alterations to Land. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or

vegetation that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The project would involve fuels treatment by removing and thinning vegetation within up to 150 feet of structures in the City of Sausalito, in accordance with the local fire code (Southern Marin Fire Protection District Fire Code § 4907.2). The buildup of fire hazardous vegetation in certain portions of the open areas, number of homes in the communities surrounding the open spaces and intensity of uses adjacent to the open spaces, such as roads, houses, U.S. Route 101, and trails, increases the likelihood of anthropogenic ignitions in these areas designated as moderate to high fire hazard severity[1]. The scope of the proposed project is consistent with a minor alteration to the condition of the vegetation around these structures shown in Figure 1. The overall contiguous fuelbreak shown in Figure 1 includes treatments on National Park Service (NPS) Golden Gate National Recreation Area (GGNRA) lands, which will be processed separately.

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 proposed project that would support an exception to the categorical exemption. No exceptions listed under Section 15300.2 apply.

Lead Agency Contact Person: Jesse Figoni

Area Code/Telephone/Extension: (415) 906-4471

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: 4/5/22 Title: Fire Inspector

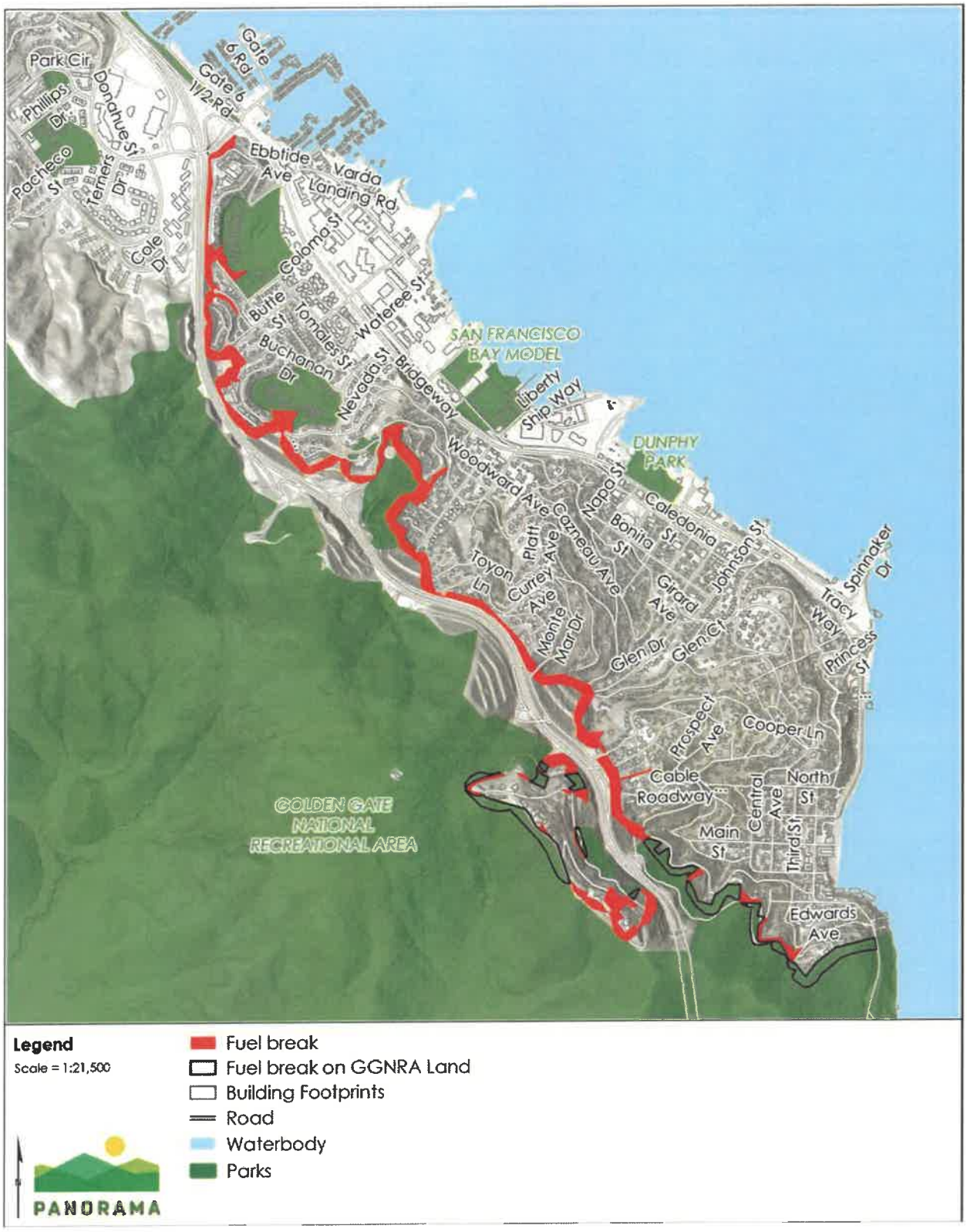
☒ Signed by Lead Agency ☐ Signed by Applicant

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: _____

[1] CAL FIRE. (2007/2008). Fire Hazard Severity Zones Maps.

Figure 1 Project Location



Date: April 6, 2022

Project: Southern Marin Zone SMFD Fuel Break Project

Categorical Exemption Summary

The Southern Marin Fire District (SMFD) has determined that the Southern Marin Zone SMFD Fuel Break Project (project) is categorically exempt under the California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4, for Minor Alterations to Land. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The project would involve fuels treatment by removing and thinning vegetation within up to 150 feet of structures on the boundary of the City of Sausalito and United States (U.S.) Route 101, in accordance with the local fire code (Southern Marin Fire Protection District Fire Code § 4907.2). The buildup of fire hazardous vegetation in certain portions of open spaces, number of homes in the communities surrounding the open spaces and intensity of uses adjacent to the open spaces, such as roads, houses, U.S. Route 101, and trails, increases the likelihood of anthropogenic ignitions in these areas designated as moderate to high fire hazard severity (CAL FIRE, 2007/2008). The scope of the project is consistent with a minor alteration to the condition of the vegetation around the existing structures on the outskirts of the City of Sausalito shown in Figure 1.

The overall contiguous fuel break shown in Figure 1 would be within 62.5 acres and includes treatments on National Park Service (NPS) Golden Gate National Recreation Area (GGNRA) lands. The NPS certified the GGNRA, Muir Woods National Monument, and Fort Point National Historic Site Fire Management Plan (GGNRA FMP) Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) on February 23, 2006, which covers fuel reduction projects on GGNRA land (NPS, 2006). In accordance with Sections 2.2 and 3.6 of the 2015 NPS NEPA Handbook, it is anticipated that the project satisfies the requirements for a Memorandum to File that will be reviewed by the appropriate GGNRA Interdisciplinary Team (IDT). Once determined to be consistent with a fuel reduction and thinning project on federal land for which NEPA was already conducted, a Memorandum to File will be filed with NPS and treatment activities can commence on GGNRA lands.

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

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

Background

Marin County voters passed Measure C in 2020, which established a 17-member Joint Powers Authority, the MWPA, to fund and oversee proactive state-of-the-art wildfire prevention and preparedness efforts within the County. Members include several cities and towns, fire protection districts, and community service districts. The MWPA was formed to develop and implement a comprehensive wildfire prevention and emergency preparedness

plan throughout almost all of Marin County. This project is a 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.

Purpose and Need

The purpose of the project is to establish and maintain a defensible space zone and fuel break along the perimeter of the City of Sausalito residential hillside communities between homes and open space areas. These communities are located on steep slopes, where a wildfire, if ignited, would rapidly escalate, and fire suppression activities would be challenging due to limited road access. By creating a fuel break, the project would slow wildfire spread, reduce wildfire intensity, extend the time residents would have to evacuate, and provide firefighters better access to the fire's edge should a wildfire occur.

Project Description

Treatment Area

The fuel break would be located at the boundary of the residential communities in the City of Sausalito and open space areas including the GGNRA. The term "fuel break" in this document refers to a strategic area where flammable vegetation is modified. In forested areas, ladder fuels and woody understory vegetation are thinned by removing dead and dying shrubs, limbing of trees, and other vegetation trimming and removal.

Work completed under this exemption would occur on approximately 45.7 acres and would involve vegetation thinning and removal within up to 150 feet from structures on non-GGNRA lands. Some of the treatment areas would be adjacent to U.S. Route 101 within California Department of Transportation (Caltrans) right-of-way (ROW) between post mile markers PM 1.10 and PM 3.30 (Caltrans, 2020). Invasive, non-native species, hazardous trees, and fire-hazardous vegetation would be targeted. No healthy, mature, scenic trees would be removed under this project. Fuel reduction treatments would avoid wetted streams and wetlands within the project area. The project area is primarily characterized by annual grassland, chaparral, mixed woodlands, and non-native eucalyptus. Treatments vary depending on the cover type, as described in the following sections.

Treatment Type

Grassland and Chaparral

Treatment within annual grassland and chapparal communities would be limited to handheld manual and mechanical removal of grasses, dead woody vegetation, and removal of low-lying shrubs and brush to achieve horizontal spacing and reduce overall fuel loading. Native stands of brush would be thinned to a spacing of 5 to 10 feet, depending upon the site conditions. Non-native plant species such as broom would be removed. Typically, non-native species would be pulled by hand for removal, although larger individuals may be cut.

Oak and Mixed Woodland

Treatment within woodland communities would be limited to manual and mechanical thinning using a hand crew. Fuel reduction work within woodland treatment areas would involve pruning tree branches 8 to 10 feet above ground (not to exceed 1/3 of the tree's height),

removal of dead/downed branches, and the removal of small diameter (less than 8 inches diameter at breast height [DBH]) live trees to achieve appropriate horizontal spacing. Understory ladder fuels including non-native, invasive Scotch broom and French broom, coyote brush shrubs, and shrub-like understory tree saplings would be removed or thinned, preferably by hand pulling. Hazardous trees (e.g., dead or dying trees), dead standing trees, and non-native trees would be removed where deemed appropriate in coordination with an arborist or qualified fire professional. In general, one snag (i.e., standing dead tree) would be retained per acre for habitat if the retained snag would not be a hazard. A hazard tree generally poses a risk of failure or fracture with the potential to cause injury to people or damage to property.

Eucalyptus

Treatment within eucalyptus groves would be conducted by a hand crew using manual and mechanical tools. Treatment would include removing eucalyptus duff and litter beneath the trees. Branches of mature, healthy trees would be thinned 8 to 10 feet above ground (not to exceed 1/3 of the tree's height) to reduce ladder fuels. Small diameter (less than 10 inches DBH) trees would be removed to achieve horizontal spacing and the stumps treated to prevent resprouting, if permitted per land managers/owners. Hazardous trees (e.g., dead or dying trees), dead standing trees, and non-native trees would be removed where deemed appropriate in coordination with an arborist or qualified fire professional.

Treatment Method

Project treatments would include handheld manual and mechanical fuel reduction using chainsaws, brush cutters, string trimmers, loppers, pole pruners, and other similar handheld tools. The treatment activities would be conducted by hand crews to create vertical and horizontal clearance. No heavy equipment would be used due to steep slopes and limited access to the work area. A trailer-mounted chipper would be operated from nearby paved roads and fire roads.

Non-native, invasive shrubs, notably broom, 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 Chapter 11.16 Pest Control of the City of Sausalito Municipal Code. 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

Project debris and cut material would be disposed of through chipping and hauling, chipping and broadcasting, or pile burning depending upon the location and condition of the work area. If chipped, the vegetative material would be fed through the chipper and broadcast at treatment areas or hauled away for disposal. Chipped material spread on site would be chipped to under 3 inches in size and would be applied at most to 2 to 4 inches in depth to minimize wildfire risk. Disposed debris would be hauled to the Marin Resource Recovery Center. Approximately 2 to 10 tons (estimated 1.4 to 7 cubic yards) of material could be disposed of each workday.

Cut material may be pile burned depending upon the conditions of the work area. Suitable pile burning treatment areas are typically flat or have gentle slopes and have open areas away from tree canopies and power lines. Areas selected for pile burning would be away from waterways. Piles would generally be 4 feet in diameter and 4 feet in height but 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

A single contractor crew would consist of 4 to 8 workers at a single location. Up to four crews may work at the same time across the fuel break.

Site Access

Treatment areas would be accessed via existing roads, fire roads, and trails to the maximum extent feasible. Private residences may be used as access points with the landowner's permission. Vehicles and equipment would be staged at the contractor's yard daily.

Schedule and Duration

All work would be performed weekdays between 8:00 am and 5:00 pm. The project is anticipated to start in April or May 2022. Following project implementation, the condition of the fuel break would be monitored and reassessed by fire district staff every year to evaluate if maintenance is needed. Maintenance treatments are anticipated to be similar to the proposed activities but are subject to change depending on the condition of the fuel break and response to initial treatment.

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 [1]

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,

[1] 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

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[2]

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.

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[2]

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

[2] Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021

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, 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[3, 4]

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 CE Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).

[3] 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.

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

IP-1 Clean Equipment[5]

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[5]

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 [4,5]

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[4,5]

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[2]

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:

[5] Adapted from measures in the Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

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

For areas with less than 50 percent ground cover:

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

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

HAZ-1 Leak Prevention and Spill Cleanup[1,5]

- The project proponent will, at a minimum, implement measures that address the following procedures related to the use of hazardous materials during work:
- Proper disposal or management of contaminated soils and materials (i.e., clean up materials)
- Daily inspection of vehicles and equipment for leaks and spill containment procedures
- Emergency response and reporting procedures to address hazardous material releases
- Emergency spill supplies and equipment will be available to respond in a timely manner if an incident should occur
- Response materials such as oil-absorbent material, tarps, and storage drums will be available in the plan area at all times during management activities and will be used as needed to contain and control any minor releases
- The absorbent material will be removed promptly and disposed of properly
- Use of secondary containment and spill rags when fueling
- Discourage “topping-off” fuel tanks
- 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 [1,3,4]

- 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[3]

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 Error! Bookmark not defined.

- 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.
- 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 Error! Bookmark not defined.

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[6] and II[7] 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.
- 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 [4,8]

[6] 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.

[7] 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.

[8] San Francisco Public Utilities Commission (SFPUC), Standard Construction Measures, July 2015.

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[1,4,5,9]

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through July 31st[10]. Not all species nest between the regulatory season, and active nests that are encountered year-round are protected.

NB-2 Nesting Bird Surveys [1,4,5]

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. 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

[9] Marin County Parks (MCP), Bird Nesting Survey Training Manual, 2017.

[10] 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.

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[1,4,5,9]

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 [1,4,5,9]

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 Prework Survey [3]

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[3]

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[3]

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[3]

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[4,5]

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 (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. 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.

SH-3 Minimization of Pile Burning Disturbance[11,12]

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[1,4]

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[3]

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 worker.
- 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.

[11] Marin County Open Space District (MCOSD). (2015, April). Vegetation and Biodiversity Management Plan. Best Management Practices.

[12] 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

- 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 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 would avoid alteration to and deposition of debris 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:

Fuel reduction treatments are planned for the adjacent Caltrans ROW and GGNRA lands. Other defensible space and fuel reduction treatments between communities is occurring in the Southern Marin 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 break 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 break 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 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. 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:

A California State Scenic Highway, U.S. Route 101, occur in the vicinity of the fuel break adjacent to the work areas (Caltrans, 2021). The proposed vegetation management activities would result in minor changes to the vegetation patterns and would only occur within 150 feet of structures. Views from motorists along U.S. Route 101 would not be degraded, because the visual change would be minimal, and the natural vegetation and characteristics of the area would remain. Equipment and vehicles may be visible along the fuel reduction areas for

short durations, but vegetation management activities would occur in any one area for a short period of time, 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, there are no hazardous waste sites located within or adjacent to the fuel break (SWRCB, 2021). No substantial ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

(f) Historical Resources:

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?	☒	☐
Potential for significant impact?	☐	☒

The visual character within the proposed fuel break 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 break would primarily be homeowners that are adjacent to the fuel break. The fuel break is along U.S. Route 101, and motorists would be able to see segments of the fuel break for brief durations.

Equipment and trucks performing the work would be temporarily visible along or staged near these fuel break. 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 break 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, as well as weed removal within up to 150 feet of structures. Some nonnative eucalyptus trees will 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 break. These methods of vegetation thinning currently occur in the Southern Marin 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 extend up to 150 feet from structures. The natural vegetation and characteristics of the areas would remain. 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.

Pile burning, if conducted, 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 which 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?	☒	☐
Potential for significant impact?	☐	☒

The proposed vegetation thinning activities would not convert designated farmland to non-agricultural uses. Project activities would primarily involve thinning and removal of small fire-hazardous trees, shrubs, and underbrush. Healthy, mature, native trees would not be removed and as such would not result in the loss of forest land, nor would it convert forestry land to non-forestry use. Adverse effects on agriculture and forestry resources would not occur.

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

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, chipper, and mechanical hand tools would operate for a few hours per crew and up to one off-haul truck 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 be used to dispose of vegetative debris instead of chipping 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 (USFS, 2021; USDA, 2014; Urbanski, 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?	☒	☐

Potential for significant impact?	☐	☒

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

Special-Status Plants and Sensitive Vegetation Communities

Riparian, wetland, or other sensitive habitats may occur along or near the fuel break but would not be impacted by the project activities because vegetation trimming or thinning would be conducted by hand and would avoid alteration to and deposition of debris within the bed, channel, or bank of a waterway (SH-1). No critical habitat for sensitive plants occurs within the vicinity of the work area. No serpentine soils are documented within the project area and therefore serpentine-associated communities are not present (USDA, 2020). There are no special-status plant species with a moderate potential to occur in the fuel break (refer to Table 1 for information and Figure 2 for locations of known occurrences in relation to the proposed fuel break).

Pile burning may be conducted 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.

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 coastal bluff morning glory, Franciscan Thistle, San Francisco collinsia, Marin checker lily, island tube lichen, small-groundcone, Oregon polemonium, and coastal triquetrella for avoidance if encountered within the fuel break.

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 project locations (IP-1, IP-2, IP-3). All sensitive plant species have a low to no potential to be impacted by vegetation removal activities with the worker training, as shown in Table 1. Significant impacts on native vegetation communities and special-status plants species would not occur

Special-Status Wildlife

Two wildlife species, the monarch butterfly and mission blue butterfly, have a moderate potential to occur within the fuel break (refer to Table 1 for information and Figure 3 for locations of known occurrences in relation to the proposed project). Training would also identify host plants, milkweed and lupine, as well as the life stages of the butterflies for avoidance (ET-1). Due to the scale and scope of the fuel reduction treatments, the butterflies would not be adversely affected as these species are mobile and could move away from any danger posed by equipment or humans.

Workers would be trained to identify and avoid the types of wildlife species with a potential to occur in the work areas (ET-1). 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 (per PDIFs NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4).

Critical habitat for northern spotted owl is not present within the project area. Several activity centers and nests are documented within 3 miles of the proposed fuel break, but none within 1 mile of the fuel break. As such, there is a low potential for northern spotted owl to occur within the project area. Vegetation treatment and removal would target invasive, non-native, and fire-hazardous vegetation and accumulative dead biomass along the fuel break. 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 up to 150 feet from structures. 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). Given the work would be focused on removal of hazardous fuels near structures and adjacent to U.S. Route 101 and the relatively low intensity of the vegetation thinning activities and the lack of suitable habitat under existing conditions, the work would not be considered major habitat alteration for northern spotted owls.

Piles for burning 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 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 project work areas as shown in Figure 5 (USFWS, 2021). Treatment activities within streams or wetlands would be limited (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). Training would ensure that workers conducting manual and mechanical activities to 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 treatment
Sensitive Plants					
Arenaria paludicola	marsh sandwort	FE, CE, CNPS 1B.1	Wet meadows, marshes	None, suitable habitat does not occur in the project footprint.	None
Calochortus tiburonensis	Tiburon mariposa-lily	FT, CT, CNPS 1B.1	Serpentine grassland	None, serpentine habitat is not expected to occur in the project footprint.	None
Calystegia purpurata ssp. saxicola	coastal bluff morning-glory	CNPS 1B.2	Rocky coastal scrub	Low; one occurrence is documented within three miles of the project area. Habitat is not expected to be suitable, but some marginal habitat may be present.	Low; can be identified and avoided with training (ET-1).
Castilleja affinis var. neglecta	Tiburon paintbrush	FE, CT, CNPS 1B.2	Serpentine grassland	None, serpentine habitat is not expected to occur in the project footprint.	None
Chloropyron maritimum ssp. palustre	Point Reyes salty bird's-beak	CNPS 1B.2	Coastal salt marsh	None, suitable habitat does not occur in the project footprint.	None
Cirsium andrewsii	Franciscan thistle	CNPS 1B.2	Bluffs, ravines, seeps, occasionally on serpentine	Low; several occurrences are documented within three miles of the project area, but suitable habitat is not expected to occur within 10 feet of roads where work will occur	Low; can be identified and avoided with training (ET-1).
Collinsia multicolor	San Francisco collinsia	CNPS 1B.2	Shady scrub, forest, occasionally on serpentine	Low, closest occurrences are on angel island.	Low; can be identified and avoided with training (ET-1).

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Eriogonum luteolum var. caninum	Tiburon buckwheat	CNPS 1B.2	Chaparral, coastal prairie, valley grassland, serpentine endemic	None, serpentine habitat is not expected to occur in the project footprint.	None
Fritillaria lanceolata var. tristulis	Marin checker lily	CNPS 1B.1	Oak or pine scrub, grassland	Low; suitable habitat present, occurrence documented near Rodeo Beach	Low; can be identified and avoided with training (ET-1).
Gilia capitata ssp. chamissonis	blue coast gilia	CNPS 1B.1	Coastal sandhills	None, suitable habitat does not occur in the project footprint.	None
Gilia millefoliata	dark-eyed gilia	CNPS 1B.2	Coastal dunes	None, suitable habitat does not occur in the project footprint.	None
Hesperolinon congestum	Marin western flax	FT, CT, CNPS 1B.1	Serpentine, grassland	None, serpentine habitat is not expected to occur in the project footprint.	None
Hypogymnia schizidiata	island tube lichen	CNPS 1B.3	Oak or pine forests	Low, suitable habitat present.	Low; can be identified and avoided with training (ET-1).
Kopsiopsis hookeri	small groundcone	CNPS 2B.3	Open woodland, mixed conifer forest	Low; occurrences are greater than 2 miles from project area, but suitable habitat is present.	Low; can be identified and avoided with training (ET-1).
Polemonium carneum	Oregon polemonium	CNPS 2B.2	Open areas	Low, closest occurrences are on angel island.	Low; can be identified and avoided with training (ET-1).
Stebbinsoseris decipiens	Santa Cruz microseris	CNPS 1B.2	Open, sandy, shaly, or serpentine sites, costal	None, suitable habitat does not occur in the project footprint.	None
Streptanthus glandulosus ssp. niger	Tiburon jewelflower	FE, CE, CNPS 1B.1	Serpentine, outcrops in grassland	None, serpentine habitat is not expected to occur in the project footprint.	None

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Triquetrella californica	coastal triquetrella	CNPS 1B.2	Pine forests, grasslands, chaparral	Low, suitable habitat present.	Low; can be identified and avoided with training (ET-1).
Sensitive Wildlife					
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; potentially suitable habitat within the project area, and there are known occurrences within the 3 mile buffer but not in proximity to work area.	Low; work will occur outside the bat maternity roosting period or surveys conducted 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).
Danaus plexippus	Monarch butterfly	FC	Grassland, woodland	Moderate, some potentially suitable habitat is present, and two occurrences are documented approximately 0.3 mile from the southern end of the project.	Low; adults can disperse from other areas; species life stages and milkweed will be included in environmental training to ensure avoidance (ET-1).
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; some potentially suitable habitat.	Low - can disperse from other areas, and suitable breeding habitat would be avoided. Species will be included in environmental training to ensure avoidance (ET-1).
Enhydra lutris nereis	southern sea otter	FT	Marine coastal habitat	None; aquatic species. Aquatic areas are excluded from the project footprint.	None

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Eucyclogobius newberryi	tidewater goby	FE	Brackish water habitats. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	None; aquatic species. Aquatic areas are excluded from the project footprint.	None
Falco peregrinus anatum	American peregrine falcon	FP	Nests in woodland, forest and coastal habitats, on cliffs or banks, and usually near wetlands, lakes, rivers, sometimes on human-made structure. In non-breeding seasons found in riparian areas and coastal and inland wetlands.	Low; suitable habitat not present in project area but occurs within 3 miles.	Low - work would occur outside nesting season or surveys will be conducted and active nests avoided (NB-1, NB-2, NB-3, NB-4).
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	SSC	Requires thick continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting	None, suitable marsh and wetland habitat is not present in the project area.	None
Laterallus jamaicensis coturniculus	California black rail	CT, FP	Tidal saltmarshes, freshwater marshes, and wetlands	None, suitable marsh and wetland habitat is not present in the project area.	None

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Melospiza melodia samuelis	San Pablo song sparrow	SSC	Marshes and wetland edges	None, suitable marsh and wetland habitat is not present in the project area.	None
Icaricia icarioides missionensis	Mission blue butterfly	FE	Coastal scrub and grassland with suitable cover of its host plant, silver lupine (*Lupinus albifrons)* and summer lupine (*Lupinus formosus*).	Moderate; the species is documented to occur in the southern portion of the project area. The 1981 occurrences notes that it represents the northern limit of the species distribution, and that no Mission blue butterflies were detected when re-surveyed in 1984 and 1985. However, this species is known to occur in the Marin Headlands, near the project footprint.	Moderate; adults can disperse from other areas; species life stages and lupine will be included in environmental training to ensure avoidance (ET-1).
Rallus obsoletus	California Ridgway's rail	FE, CE	Saltwater marshes, freshwater marshes, and mangrove swamps	None, suitable marsh and wetland habitat is not present in the project area.	None
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; species may use forested or grassland habitat as upland dispersal. Suitable breeding habitat is not present in project area but occurs within 3 miles.	Low - can disperse from other areas, and suitable breeding habitat would be avoided. Species will be included in environmental training to ensure avoidance (ET-1).
Spirinchus thaleichthys	longfin smelt	FC, CT	Found in open waters of estuaries, mostly in the middle or bottom of the water column.	None; project is not within suitable habitat	None
Strix occidentalis caurina	Northern spotted owl	FT, CT	Dense canopies of mature and old-	Low - Activity centers and nests are documented within	Low; Species will be included in environmental training to ensure

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			growth forests. Nests in tree hollows	3-mile buffer around project area, but suitable nesting habitat does not appear to be present in the vicinity of the project area.	avoidance (ET-1). Work would occur outside nesting season or surveys will be conducted (NB-1, NB-2, NB-3).

Notes:

Species with occurrences within 3 miles of project areas were examined. Species which are considered "extirpated" or those with occurrence data greater than 75 years old were removed from the analysis as they are not anticipated to occur in the vicinity of the work area. Species with occurrence data which was greater than 50 years old was examined for inclusion on a case-by-case basis.

FE	Federally Endangered	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: (CDFW, 2021; CNPS, 2021; CDFG, 2003; Hickman, 1993; Stebbins, 2003)

Cultural Resources and Tribal Cultural Resources[13]		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Equipment and vehicles for the fuel reduction activities would operate from existing roadways. No intense ground disturbing activities (e.g., discing) would occur. While some hand pulling of invasive species may occur, the potential to disturb cultural resources is generally low since this work results in little ground disturbance and no heavy equipment. 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 unless additional cultural work is conducted (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). Significant impacts on cultural resources and human remains would not occur.

A cultural resources records search was completed for the fuel treatment zone (CUL-3). Several historic properties were identified within or directly adjacent to the treatment areas and one prehistoric resource was identified (Far Western, 2022). The prehistoric site has not been evaluated for listing in the National Register of Historic Resources (NRHR) of the California Register of Historical Resources (CRHR). While the resource is outside the proposed fuel break, a pedestrian survey of the work area closest to the recorded resource would be conducted prior to treatment activities to identify if there are any visible archaeological deposits to ensure full avoidance (CUL-3). The type of vegetation treatment would not change the character of the natural wooded landscape surrounding the recorded historic resources and nor alter the physical structures.

Pile burning 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?	☒	☐
Potential for significant impact?	☐	☒

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

The vehicles and equipment conducting the fuel reduction 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 create defensible space between occupied structures and open space areas. Implementation of fuel reduction activities 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 to the work areas would generally occur on existing paved roads. Work areas would be accessed on foot, and operation of equipment would occur using existing paved roads adjacent to the work areas.

Soil erosion and loss of topsoil could occur during manual and mechanical vegetation cutting and removal through the exposure of bare soils or ground disturbance from pulling large vegetation. After the vegetation thinning is completed, erosion and topsoil loss through loss of root-soil matrix strength if root systems die is expected to be minimal. Root systems of larger vegetation would generally be left in place, minimizing the potential for erosion. No serpentine soils, which are typically vulnerable to erosion, are documented within the project area (Figure 1). While some soil types present in work areas may be more prone to erosion than others, vegetation removal and cutting that maintain at least 70 percent of groundcover would not result in substantial erosion (Lang & McDonald, 2005). Erosion control devices would be installed (GEO-1) in areas where erosion could occur. 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?	☒	☐
Potential for significant impact?	☐	☒

Vegetation thinning activities would involve manual and mechanical vegetation removal and pile burning within the fuel break. 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[14].

The proposed 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 defensible space 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?	☐	☒

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 Chapter 11.16 Pest Control of the City of Sausalito Municipal Code 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 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.

[14] 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).

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

Work areas would be mostly accessed using existing paved roads adjacent to the work areas. 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). 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 of invasive species would occur within the fuel break. The majority of the proposed manual 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). 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?	☐	☒
Potential for significant impact?	☐	☒

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 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?	☐	☒
Potential for significant impact?	☐	☒

Fuel reduction activities would not result in the loss of availability of a known mineral resource because the work would occur within up to 150 feet of existing structures and would not permanently alter any features. Vegetation clearance is intended to 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?	☒	☐
Potential for significant impact?	☐	☒

The proposed fuel reduction activities would occur on weekdays between 8:00 am and 5:00 pm. This timeframe would conform with the appropriate noise ordinance (Marin County Noise Ordinance § 6.70.030; Sausalito Noise Ordinance § 12.16.140)[15] which allows construction activities Monday through Friday 7:00 am or 8:00 am to 6:00 pm depending upon the ordinance. Work would progress along the fuel break. Most recreationalists or motorists are only in a single area for a short duration and would be able to move away from noisy areas with little impact on their experience. Residences would experience noise associated with activities, but it is anticipated that activities in any one location would only occur for a few hours. A single residence may be able to hear equipment operating for a day as activities progress along the fuel break. 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?	☐	☒
Potential for significant impact?	☐	☒

The workers implementing the fuel reduction activities are anticipated to be sourced from the existing contractor and conservation 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?	☐	☒
Potential for significant impact?	☐	☒

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?	☒	☐
Potential for significant impact?	☐	☒

[15] 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.

Treatments would occur adjacent to GGNRA lands, primarily outside of recreational and publicly accessible areas (see Figure 1). Recreational areas within Cypress Ridge Open Space, a City of Sausalito park, would be unavailable 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. 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 Southern Marin Zone (e.g., Muir Woods National Monument, MCOSD open space preserves) that the few displaced recreationalists could use if discrete areas are unavailable due to vegetation management activities. The proposed 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?	☐	☒

Multiple crews could conduct vegetation management activities within the fuel break in a single day. A single crew of up to 8 workers would likely be working at a single work area and up to four crews may operate at a time. An estimated 10 to 66 daily one-way vehicle trips would occur, which would not exceed the screening threshold of 110 trips per day[16]. 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. 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?	☒	☐
Potential for significant impact?	☐	☒

Biomass generated from vegetation removal activities may be processed using a chipper and hauled to a processing facility 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 the Marin Resource Recovery Center, which has a permitted capacity of 2,640 tons per day and would be able to accept the

[16] 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.

chipped material (CalRecycle, 2021). No impact related to utilities and service systems would occur.

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

The fuel break is within the Local Responsibility Area (LRA) 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., 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. Impacts to people and structures from increased fire risk would not occur.

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Figure 1 Project Location

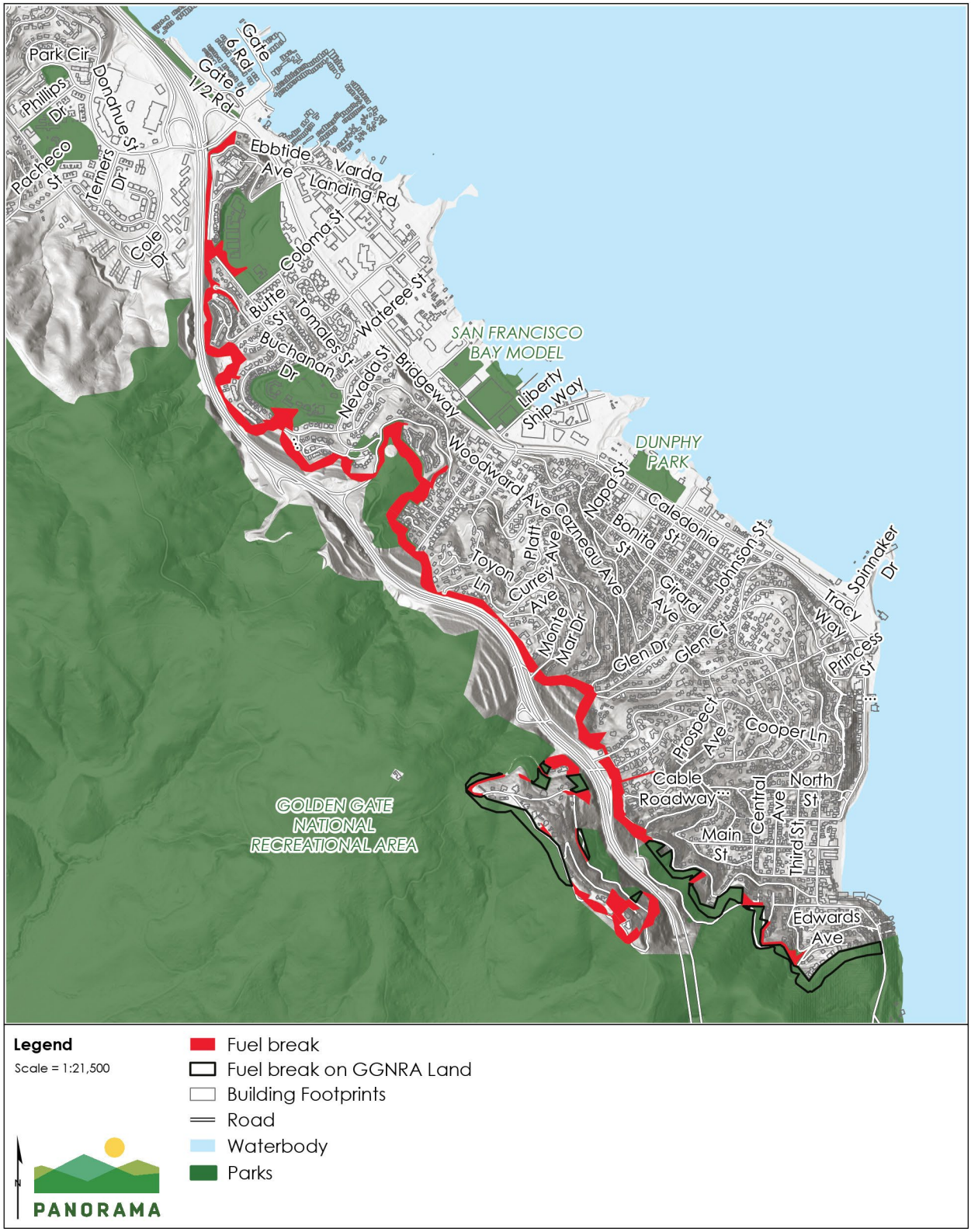

Figure 2 Special-Status Plant Occurrences

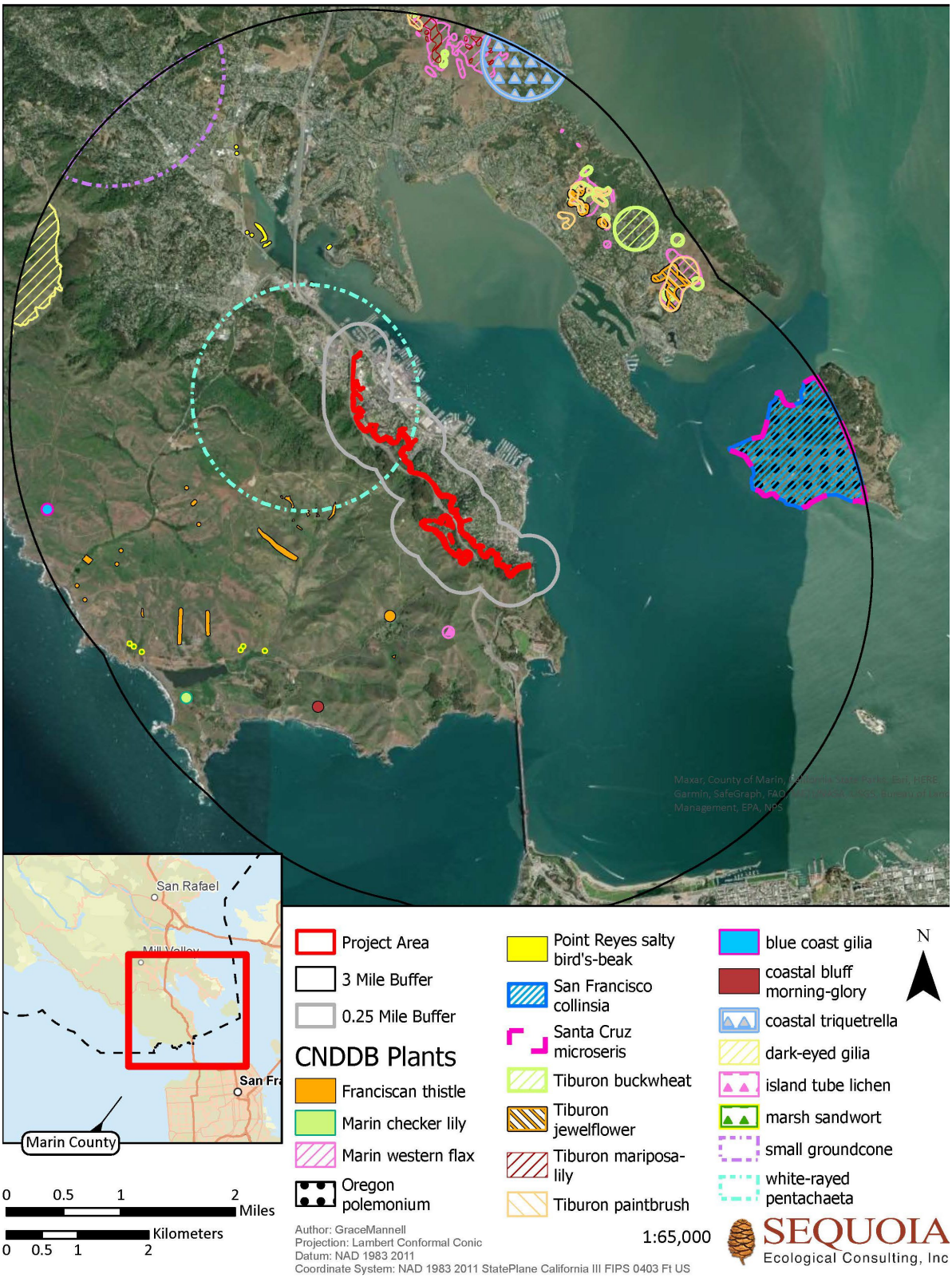

Figure 3 Special-Status Wildlife Occurrences

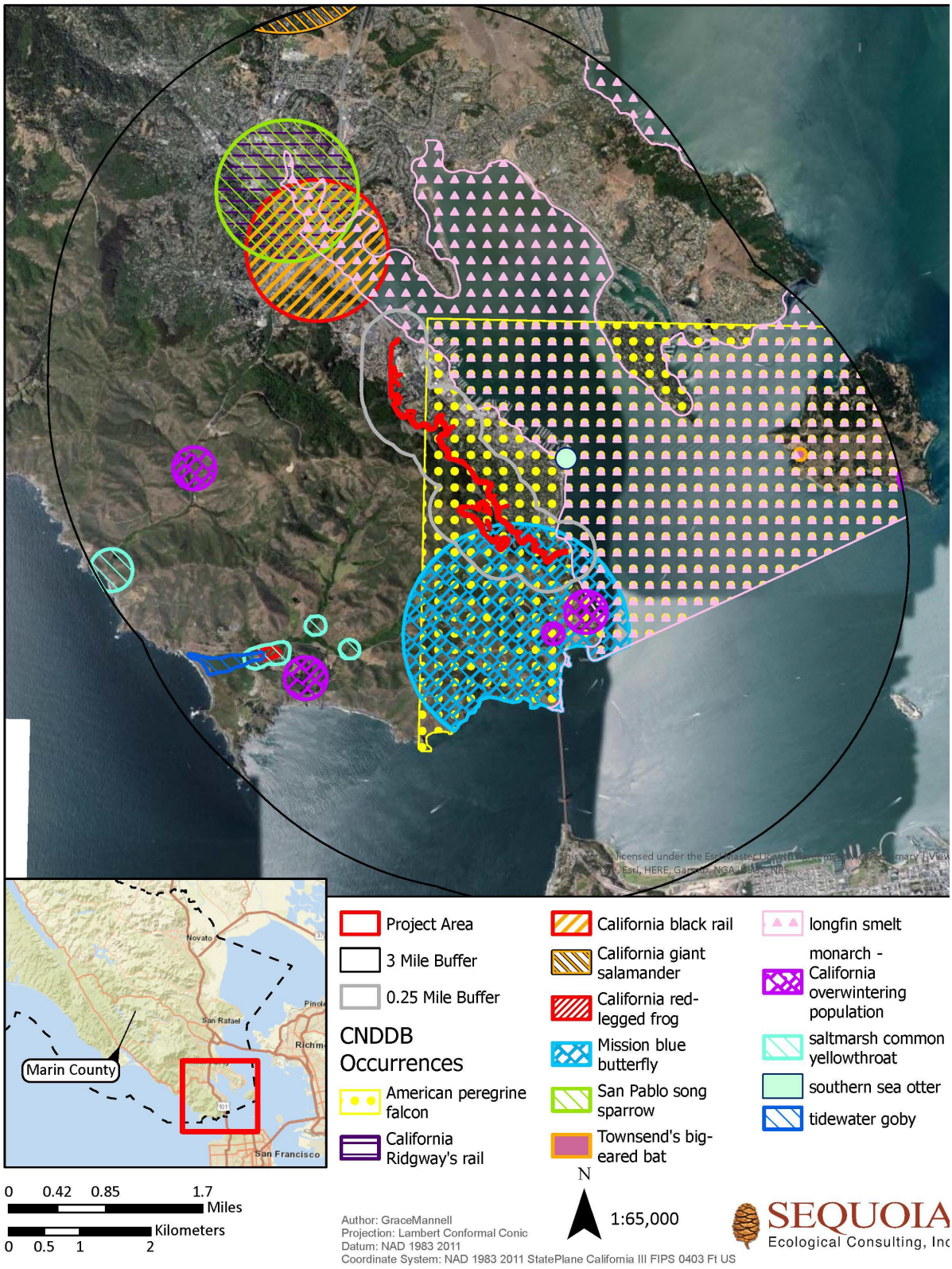

Figure 4 Northern Spotted Owl Observations

Figure omitted to protect northern spotted owl nest locations.

Figure 5 Wetlands and Waterways