State of California - Department of Fish and Wildlife

2021 ENVIRONMENTAL FILING FEE CASH RECEIPT

DFW 753.5a (REV. 01/01/21) Previously DFG 753.5a

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RECEIPT NUMBER:
21 — 11/02/21 — 233

STATE CLEARINGHOUSE NUMBER *(If applicable)*

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

LEAD AGENCY	LEAD AGENCY EMAIL	DATE
NOVATO FIRE PROTECTION DISTRICT		11/02/21

COUNTY/STATE AGENCY OF FILING	DOCUMENT NUMBER
Marin	

PROJECT TITLE

NOVATO ZONE ROADSIDE EVACUATION ROUTES PROJECT

PROJECT APPLICANT NAME	PROJECT APPLICANT EMAIL	PHONE NUMBER
NOVATO FIRE PROTECTION DISTRICT		(415) 878-2693

PROJECT APPLICANT ADDRESS	CITY	STATE	ZIP CODE
95 ROWLAND WAY	NOVATO	CA	94945

PROJECT APPLICANT *(Check appropriate box)*

☑ Local Public Agency ☐ School District ☐ Other Special District ☐ State Agency ☐ Private Entity

CHECK APPLICABLE FEES:

☐ Environmental Impact Report (EIR)	$3,445.25	$	0.00
☐ Mitigated/Negative Declaration (MND)(ND)	$2,480.25	$	0.00
☐ Certified Regulatory Program (CRP) document - payment due directly to CDFW	$1,171.25	$	0.00

☐ Exempt from fee
- ☐ Notice of Exemption (attach)
- ☐ CDFW No Effect Determination (attach)

☐ Fee previously paid (attach previously issued cash receipt copy)

☐ Water Right Application or Petition Fee (State Water Resources Control Board only)	$850.00	$	0.00
☑ County documentary handling fee		$	50.00
☐ Other		$	

PAYMENT METHOD:

☐ Cash ☐ Credit ☐ Check ☐ Other **TOTAL RECEIVED** $ 50.00

SIGNATURE	AGENCY OF FILING PRINTED NAME AND TITLE
X	MARIN DEPUTY CLERK: J GILARDI

ORIGINAL - PROJECT APPLICANT | COPY - CDFW/ASB | COPY - LEAD AGENCY | COPY - COUNTY CLERK | DFW 753.5a (Rev. 01012021)

Notice of Exemption

21 – 2021-233

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

From (Public Agency):
Novato Fire Protection District
95 Rowland Way
Novato, CA 94945

FILED
NOV 02 2021
SHELLY SCOTT
MARIN COUNTY CLERK
BY: I.GILARDI, Deputy

Project Title: Novato Zone Roadside Evacuation Routes Project

Project Applicant: City of Novato

Project Location – Specific: Evacuation Routes within the Novato Zone (refer to Figure)

Project Location – City:
Novato

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:
The purpose of the project is to improve evacuation and ingress/egress routes throughout communities within the Novato Fire District. The project would reduce heat, flame, ember, and smoke impingement on roadways and nearby structures, which would enable safer and more efficient evacuations for residents and improve access for emergency personnel.

Name of Public Agency Approving Project: Novato Fire Protection District

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

Exempt Status (check one):

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☐ Common Sense Exemption (Sec. 15061(b)(3));
- ☒ Categorical Exemption. State type and section number: 15304(i). Minor alterations to land for fuel management activities. 15301. Existing Facilities maintenance and minor alterations for vegetation removal along roadways.
- ☐ Statutory Exemptions. State code number:_____

Reasons why project is exempt:
The project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 for Minor Alterations to Land and Section 15301, Class 1, for Existing Facilities. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1 exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The project would involve

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

vegetation reduction activities along evacuation routes in the Novato Zone. The scope of the project is consistent with a minor alteration to the condition of the vegetation along the routes shown in Figure 1. Additionally, no healthy, mature, scenic trees would be removed; no work would take place within sensitive habitat, including wetlands or waterways; and no ground disturbance, such as excavation, would take place. There are no facts or circumstances specific to this project that would support an exception to the categorical exemption. No exceptions listed under Section 15300.2 apply.

Lead Agency Contact Person:	**Area Code/Telephone/Extension:**
Lynne Osgood	415.878.2693

If filed by applicant:

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

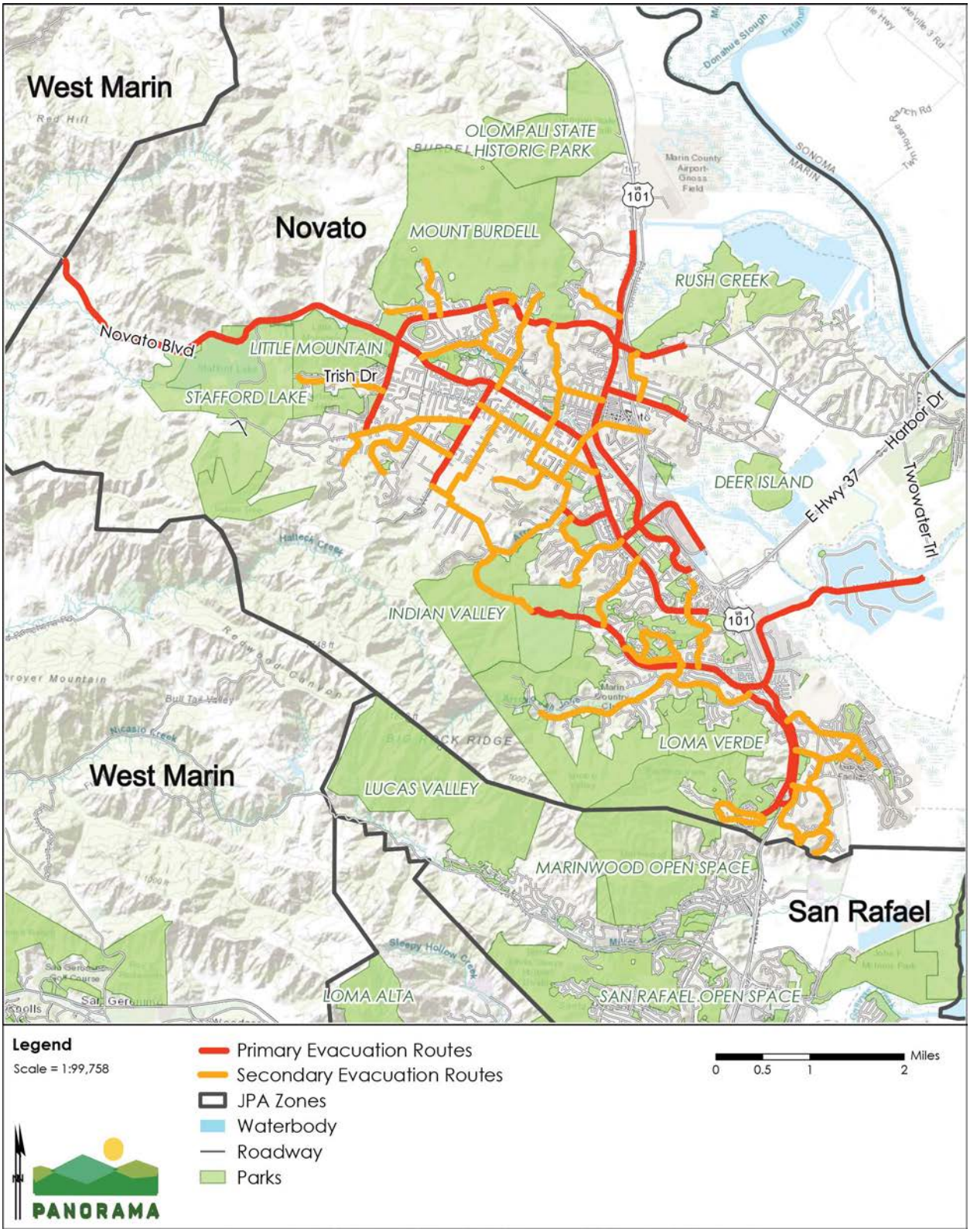
Signature: _____ Date: 11/2/21 Title: Deputy Fire Marshal

☑ Signed by Lead Agency ☐ Signed by Applicant

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

Date Received for filing at OPR: _____

Figure 1 Project Roadways



MARIN WILDFIRE PREVENTION AUTHORITY

California Environmental Quality Act Categorical Exemption Determination Memorandum

Date: October 21, 2021

Project: Novato Zone Roadside Evacuation Routes Project

Categorical Exemption Summary

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

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

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

Background

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

Purpose and Need

The purpose of the project is to improve evacuation and ingress/egress routes throughout communities within the Novato Fire District. The project would reduce heat, flame, ember, and

smoke impingement on roadways and nearby structures, which would enable safer and more efficient evacuations for residents and improve access for emergency personnel.

Project Description

Treatment Area

The project activities would occur within the designated wildland urban interface (WUI) boundary, or along primary or secondary evacuation routes in the Novato Fire District, as shown in Figure 1. The project would impact 35 neighborhoods and approximately 15,000 habitable structures in the WUI area. Approximately 64 miles of roads have been prioritized for roadside vegetation treatment.

Treatment activities would typically involve vegetation removal and mowing within 10 feet from road edge and in rare instances, up to 100 feet if adjacent to structures or where topographical or vegetation fuels necessitate greater treatment distances. Areas where fuel treatments may need to extend beyond 10 feet would be determined by a forester or otherwise qualified professional who understands forest ecology and fuel management or a fire professional, prior to treatments. Vertical vegetation clearance would occur up to 15 feet to allow safe vehicle ingress and egress of emergency personnel and residents. Treatments would include the removal of invasive, non-native, fire-hazardous, and dead vegetation along roadways. The project would enhance the health of native forest and plant communities through removal of competing invasive plants and the buildup of fire-hazardous trees up to 8 inches diameter in breast height (DBH). Typically, hazard trees are only dead and dying trees, but rarely, may include a tree that is a structural hazard and is determined to be unstable due to a defect or other factors. No healthy, mature, scenic trees would be removed under this project.

Treatment Method

Vegetation would be removed using manual and mechanical hand tools. The equipment and tools that could be used include chainsaws, pole loppers, broom pullers, chippers. A tractor with a mower head may operate from the road prism.

Disposal

Vegetative debris may be chipped on or off the work site and broadcast at work areas, where appropriate, or hauled away to a proper disposal facility. The facilities used for disposal include West Marin Compost and the Redwood Landfill. It is anticipated that an estimated 20 to 25 cubic yards of vegetative debris would be disposed of each workday.

Workers

Contractor crews would conduct the vegetation removal and chipping along roadways. Each crew would typically consist of six to eight workers. It is anticipated that two or more crews would be conducting treatment at the same time.

Site Access

Project work would occur from public and private paved roadways. Lane or partial lane closures may be needed for work along roadways. Any lane closures would either require encroachment permits, or if within the City of Novato limits and completed by the City of Novato, would be noticed appropriately. Any vegetation treatment activities that are

conducted outside the roadway right-of-way would require landowner permission and permits, depending upon the landowner.

Equipment and vehicles would be staged at the contractor's equipment yard or at pullouts in residential neighborhoods. Equipment and vehicles may be staged in additional public or private locations with landowner permission.

Schedule and Duration

Treatments would be conducted during weekdays from 8:00 am to 5:00 pm. Vegetation removal along evacuation routes is anticipated to begin in late October 2021 with an anticipated 8 to 10 miles of work completed in the 2021-2022 fiscal year and an anticipated 10 to 20 miles of work completed each year in the following years, as needed. Mowing from the roadway prism would occur annually in June, where appropriate, along evacuation routes. After initial project implementation at any one location, vegetation removal maintenance would occur every 3 years, unless tree limbs are obstructing emergency access within the evacuation routes, in which case it would occur as needed to remove obstructing vegetation.

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, that will be incorporated as applicable into the project design and implementation for each of its projects. Refer to the end of this document for citations to the documents the features were adapted from. The following specific design and implementation measures are part of the project:

CUL-1 Training[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 training will address the potential for exposing subsurface resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified including reporting the resource to a qualified archaeologist, and understanding all procedures required under 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[1]

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

[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.

culturally affiliated with the geographic area of the project site, if archaeological in nature and if the tribe has requested that such information be shared with them.

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

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

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

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

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

ET-1 Environmental Training for Biological Resources[2,3]

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

[2] 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.

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

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).

IP-1 Clean Equipment[3,4]

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[3,3]

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[3,5]

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[3,3]

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:

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

- Sow native grasses and other suitable native vegetation on denuded areas where natural colonization or other replanting will not occur rapidly; use slash or chips to prevent erosion on such areas.
- Use surface mounds, depressions, logs, rocks, trees and stumps, slash and brush, the litter layer, and native herbaceous vegetation downslope of denuded areas to reduce sedimentation and erosion, as necessary to prevent erosion or slope destabilization.
- Install approved, biodegradable erosion-control measures and non-filament-based geotextiles (e.g., coir, jute) when:
  - Conducting substantial ground-disturbing work (e.g., use of heavy equipment, pulling large vegetation) within 100 feet and upslope of currently flowing or wet wetlands, streams, lakes, and riparian areas;
  - Causing soil disturbance on moderate to steep (10 percent slope and greater) slopes; and
  - Removing invasive plants from stream banks to prevent sediment movement into watercourses and to protect bank stability.
- Sediment-control devices, if installed, will be certified weed-free, as appropriate. Sediment control devices will be inspected daily during active work to ensure that they are repaired and working as needed to prevent sediment transport into the waterbodies.

For areas with less than 50 percent ground cover:

- Any of the above measures
- Stabilize with mulch or equivalent immediately after project activities, to the maximum extent practicable.
- 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[1,3]

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[1,2,3]

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

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

NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors[3,5]

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

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

- Shut down equipment when not in use. Equipment will not be idled unnecessarily.
- Operate heavy equipment during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship).
- Locate project activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible

NSO-1 Northern Spotted Owl Nesting Season Avoidance[1]

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

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

NSO-2 Work During Northern Spotted Owl Nesting Season – Surveys[1]

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

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

1. If it is conclusively determined that there are nesting northern spotted owls, planned activities that generate noise (e.g., mowing, heavy equipment usage, crews with hand tools that generate noise) in areas without regular human disturbances from human residency (e.g., leaf blowers, home construction and remodeling, roadways), that are within 0.25-mile of an identified active nest will

not begin prior to September 1 unless the young have fledged, at which time work may begin no earlier than July 10. Prescribed burns may only occur within suitable northern spotted owl habitat (as determined by a qualified biologist) during the nesting season if protocol surveys have determined that northern spotted owl nesting is not occurring in the area of planned activity.

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

NSO-3 Northern Spotted Owl Habitat Alteration[1]

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

NSO-4 Retain Dusky-footed Woodrat Nests[1,4]

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

NB-1 Nesting Bird Season Avoidance[1,3,4,6]

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through July 31st [7]. Not all species nest between the regulatory season, and active nests that are encountered year-round are protected.

NB-2 Nesting Bird Surveys[1,3,4]

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

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

Nesting bird surveys will occur within no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7

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

[7] 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.

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

NB-3 Nesting Birds: Active Nest Avoidance[1,1,3,4,7]

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[1,3,4,7]

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[2,3]

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[2]

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[2]

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[2]

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[3,4]

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

TR-1 Emergency Access to Project Areas[1,2]

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[2]

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.
- 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 Guidelines Section 15300.2)

(a) Location:

Sensitive habitats, including watercourses and wetlands areas would be avoided. Riparian woodlands may be encountered but any vegetation trimming or thinning along watercourses would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (SH-1). Due to the scope and design of the project, the project would not adversely affect riparian habitats as the work would not affect shade or species diversity and could be beneficial if invasive species removal is needed, therefore, exception (a) does not apply.

(b) Cumulative Impact:

Vegetation treatments, similar to that proposed for this project, have occurred within the Novato Zone and greater Marin County. Ongoing maintenance of the vegetation along the project roadways would be limited to the types of activities previously described, which would be performed periodically to maintain fuel reduction areas to help slow or stop the spread of wildfire and provide safe access for emergency responders. The visual character of project work areas would be modified each time vegetation treatments are implemented to maintain emergency vehicle accessibility and fuel reduction zones as vegetation regrows, due to reduction in vegetation cover and type (e.g., broom removal), but the overall natural character

would remain, and the treatments are not considered a visual degradation. The design and implementation of this project ensures that significant effects on environmental resources are avoided over successive years of maintenance. As such, the project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

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

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

(d) Scenic Highways:

No designated California State Scenic Highways occur in the vicinity of the evacuation routes; therefore, exception (d) does not apply (Caltrans, 2021).

(e) Hazardous Waste Sites:

Per the current government database of hazardous waste sites at the time of this filing, a few open hazardous waste sites and several closed sites are located adjacent to the work areas along the roadways (SWRCB, 2021). No intense ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

(f) Historical Resources:

The project does not propose any intense ground-disturbing activities, and in the majority of areas, work would occur within 10 feet from roadways, where similar work has occurred in the past. Some hand pulling of invasive plants could occur. As part of the project, workers would participate in a cultural training prior to project implementation (CUL-1) and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource would be fully avoided or only methods allowed by a qualified cultural resource specialist/archaeologist would be implemented (CUL-2). Project activities would not alter any built environment features and would not cause a substantial adverse change in the significance of a known or previously undiscovered historical resource. Therefore, exception (f) does not apply.

Environmental Assessment

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

Equipment and trucks performing the work would be temporarily visible along the evacuation roadways. The vegetation thinning activities would be for a short period of time (a few hours to a day) in any one location and the work would be performed in limited areas within the Novato Zone at any given time.

Minor changes to the vegetation patterns and form would occur from manual and mechanical removal of small or hazard trees and shrubs in forested areas as well as weed removal within typically 10 feet, but occasionally up to 100 feet along the roadways. No healthy, mature, scenic trees would be removed as part of this project. Due to topography or fuel loads, trimming and thinning of understory vegetation may occur out to 100 feet from structures although the bulk of the work is anticipated within the roadway ROW, and limited to 10 feet from road edge. The vegetative material may be chipped and left in place or chipped and hauled away from the work area. Chipped material, if spread on site, would be visible during decomposition, but generally blends into the forest floor. Viewers in the immediate vicinity may notice changes in the density and type of the vegetation along the roadways. These methods of roadside vegetation thinning currently occur throughout Marin County to maintain ingress and egress. Views in the immediate foreground are also dominated by the man-made road itself and vegetation thinning along the sides of roadways would not be considered significant visual degradation. This type of work and vegetation management is typical of the area and a characteristic part of the existing environment. The natural characteristic of the area around the roadways would remain. Significant adverse effects to aesthetics would not occur. No State or locally designated scenic roads or vistas are located in the vicinity of the evacuation routes. Visual degradation as seen from State or locally designated scenic roads or vistas, including the Marin County ridge and upland greenbelt areas, would not occur.

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

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

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

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

Biological Resources		
Question	**Yes**	**No**
Relevant to the project?	☒	☐

Potential for significant impact?	☐	☒

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

Special-Status Plants and Sensitive Vegetation Communities

Riparian, wetland, or other sensitive habitats may occur along or near road edges. No critical habitat for sensitive plants occurs within the vicinity of the work area. Minor portions of serpentine soils are documented within the project area near San Andreas Drive and therefore some minor serpentine-associated communities could occur (USDA, 2020). Some special status plant species have a moderate to high potential to occur in the roadside work areas (refer to Table 1 for information and Figure 2 for locations of known occurrences in relation to the work area).

Vegetation trimming and removal would be conducted by hand to remove fuel loading and allow safe ingress and egress. Workers would receive training from a qualified professional prior to beginning the roadside vegetation treatments, which would include identification of special-status plant species and sensitive communities, including serpentine-associated communities, for avoidance, or, as appropriate, training for species-specific protocols for work, such as trimming methods (ET-1). Training would also include identification for avoidance by workers and equipment of sensitive communities, such as wetlands and serpentine habitats. The training for this project would involve identification of Tiburon buckwheat, fragrant fritillary, congested-headed hayfield tarplant, Marin western flax, Baker's navarretia, Mount Burdell jewelflower, and Mt. Tamalpais bristly jewelflower for avoidance if encountered along the roadways.

The blooming season for the specified plants ranges from February to November, depending on the individual plant species. Initial treatment is anticipated to begin in October 2021 and would occur mostly outside of the blooming season although roadside mowing could occur during the blooming season. The scope of the vegetation thinning and cutting activities is typically limited to 10 feet from the roadway. Roadways have been found to act as vectors for invasive plant species, with traffic volume as a key variable related to dispersal (Lemke, Buchholz, Kowarik, Starfinger, & Lippe, 2021). Areas adjacent to roadways are therefore anticipated to have a higher non-native and invasive plant species cover than other locations further than 10 feet from the roadway edges. The vegetation trimming and removal would generally focus on removing invasive and fire-hazardous species, leaving native species in place (IP-4). A reduction in roadside invasive plant species may be beneficial for native plants including the special-status species with a potential to occur in the area.

Workers would clean equipment and handle vegetation to avoid introducing or further spreading invasive species and plant pathogens if there is reason to believe the equipment came in contact with infestations of plant pathogens prior to moving to new work areas (IP-1, IP-2, IP-3). All sensitive plant species have a low to no potential to be impacted by roadside vegetation removal activities as shown in Table 1. Significant impacts on native vegetation communities and special-status plants species would not occur.

Special-Status Wildlife

Some wildlife species have a moderate or high potential to occur along the project roadways as shown in Table 1. Project activities would generally be conducted August to February,

avoiding nesting birds and maternity bat roosts. If activities must occur from February to August, appropriate nesting bird and/or maternity roosting bat surveys would be conducted (NSO-1, NSO-2, NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4) and nests or roosts avoided. Training would include avoidance of sensitive communities that provide habitats for special-status species, such as wetlands. All of the special status wildlife species that could occur in the project area have a low potential for impacts from roadside vegetation clearance activities as detailed in Table 1.

The western bumble bee has a high potential to occur in the project area. Due to the scale of the roadside vegetation treatments, the western bumble bee would not be adversely affected as bumble bees are mobile and could move away from any danger posed by equipment or humans.

The California red-legged frog has a moderate potential to occur in the project area. Less than 100 feet of California red-legged frog critical habitat is present approximately 3 miles away from the project roadways and would not be impacted by vegetation treatment (USFS, 2021; NOAA, 2021. Streams and wetlands within and adjacent to the work areas would be avoided by equipment and workers. Training would include identification of the California red-legged frog and ponds, streams, and wetland areas for avoidance. The types of activities performed, given much of the work except mowing from the road edge would be performed by hand, has very low potential to encounter or harm amphibians.

The western pond turtle and foothill yellow-legged frog both have a high potential to occur within or adjacent to the work areas. Streams and wetlands found within or adjacent to the work areas would be avoided by equipment and workers. Training would also identify habitat for the western pond turtle and foothill yellow-legged frog for avoidance (ET-1). The types of activities performed, given much of the work except mowing from the road edge would be performed by hand, has very low potential to encounter or harm amphibians. Six northern spotted owl activity centers are documented within 3 miles of the project work areas, and one documented activity center overlaps a portion of the work area. Vegetation treatment and removal would target invasive, non-native, and fire-hazardous vegetation and accumulative dead biomass along evacuation routes. Trees up to 8 inches DBH could be removed as part of clearance for horizontal spacing. This vegetation would grow back and be retreated as needed. Vegetation treatment would typically occur within 10 feet, and rarely up to 100 feet from roadways and occupied structures. Due to the sensitivity to human presence, northern spotted owls are less likely to nest within the fuel reduction zones as these areas are directly adjacent residential communities. As stated previously, vegetation treatment activities would occur outside of the northern spotted owl nesting season to the extent possible (NSO-1). If work was to occur during the nesting season, surveys would be conducted to determine if a breeding pair were located within 0.25 mile of the work area, and treatments would not occur before July 31 if an active nest was present, unless the young have fledged (NSO-2). If any large trees 10 inches DBH or greater are identified as hazard trees, a qualified northern spotted owl biologist would be consulted (NSO-3). Dusky-footed wood rat nests would be left intact wherever feasible (NSO-4). Given the work would be focused on removal of hazardous fuels near structures, the work would not be considered major habitat alteration for northern spotted owls. Significant impacts on special-status wildlife species would not occur.

Wetlands

Seasonal streams and wetlands intersect or occur adjacent to the project roadways (USFWS, 2021). Streams would be avoided by project activities. Due to the type of project and extent of the vegetation treatment activities out to typically 10 feet along roadways and occasionally up to 100 feet, wetlands may be encountered, but no activities would occur within wetlands.

Training would ensure that workers avoid wetlands, particularly in the small areas where vegetation thinning extends further than 10 feet (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					
Amorpha californica var. napensis	Napa false indigo	CNPS 1B.2	Wetland, riparian woodland	Low - Suitable habitat likely does not occur within project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities
Chloropyron maritimum ssp. palustre	Point Reyes salty bird's-beak	CNPS 1B.2	Coastal salt marsh	None - No suitable habitat included in project area	None
Chloropyron molle ssp. molle	soft salty bird's-beak	FE, CNPS 1B.2	Salt grass/pickleweed marshes at or near the limits of tidal action	None - No suitable habitat included in project area	None
Eriogonum luteolum var. caninum	Tiburon buckwheat	CNPS 1B.2	Chaparral, coastal prairie, valley grassland	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities
Fritillaria liliacea	fragrant fritillary	CNPS 1B.2	Heavy soil, open hills, fields near coast	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities
Hemizonia congesta ssp. congesta	congested-headed hayfield tarplant	CNPS 1B.2	Northern coastal scrub, valley grassland	High - Occurrence documented within project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Hesperolinon congestum	Marin western flax	FT, CT, CNPS 1B.1	Serpentine grassland	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Can be identified and avoided with training; if work that could impact flowering body occurs during blooming season, surveys would occur
Navarretia leucocephala ssp. bakeri	Baker's navarretia	CNPS 1B.2	Freshwater wetlands, northern oak woodland, foothill woodland, valley grassland, wetland-riparian	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities
Polygonum marinense	Marin knotweed	CNPS 3.1	Coastal salt, brackish marshes, swamps	None - No suitable habitat included in project area	None
Streptanthus anomalus	Mount Burdell jewelflower	CNPS 1B.1	Ecotone between oak woodland and grassland	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities
Streptanthus glandulosus ssp. pulchellus	Mt. Tamalpais bristly jewelflower	CNPS 1B.2	Chaparral, valley grassland	High - Occurrence documented within project area	Low – Can be identified and avoided with training; work is limited to roadside areas where there is existing disturbance from previously activities
Sensitive Wildlife					
Antrozous pallidus	pallid bat	SSC	Roosts in large diameter trees and abandoned buildings	Moderate - Habitat for roosting may be	Low – Work would occur outside the bat maternity roosting period

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				present in project area	or surveys conducted and roosting trees avoided
Athene cunicularia	burrowing owl	SSC	Nests in grassland burrows	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Work would occur outside nesting season or surveys conducted and active burrows avoided
Bombus occidentalis	western bumble bee	CC	Grassland	High - Occurrence documented within project area	Low – Type of work not likely to affect bumble bee, which can disperse
Charadrius nivosus nivosus	western snowy plover	FT, SSC	Nests in coastal dunes	None - No suitable habitat included in project area	None
Corynorhinus townsendii	Townsend's big-eared bat	SSC	Caves, mines, bridges, building, rock crevices, tree hollows in coastal lowlands, and cultivated valleys; prefer roosting in caves or other similar open spaces	Moderate - Potentially suitable habitat within the project area, and one occurrence nearby project area	Low – Work would occur outside the bat maternity roosting period or surveys conducted and roosting trees avoided
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 - Species is highly associated with streams in wet coastal forests, which likely does not occur within project area	Low – Can disperse from other areas, suitable breeding habitat would be avoided
Elanus leucurus	white-tailed kite	FP	open oak grassland, desert grassland, farm country, marshes with trees for perching and nesting	High - Occurrence documented within project area	Low – Work would occur outside nesting season or surveys conducted

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Emys marmorata	western pond turtle	SSC	Freshwater ponds and streams	High - Occurrence documented within project area	Low – Can disperse from other areas, suitable breeding habitat would be avoided
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	SSC	Coastal riparian and wetland areas	Low - Suitable habitat likely does not occur within project area	Low – Work would occur outside nesting season or surveys conducted
Laterallus jamaicensis coturniculus	California black rail	FT, FP	Wetlands and marshes	None - No suitable habitat included in project area	None
Melospiza melodia samuelis	San Pablo song sparrow	SSC	Marshes and wetland edges	None - No suitable habitat included in project area	None
Pogonichthys macrolepidotus	Sacramento splittail	SSC	Aquatic	None - No suitable habitat included in project area	None
Rallus obsoletus obsoletus	California Ridgway's rail	FE, CE, FP	Wetlands and marshes	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – Work would occur outside nesting season or surveys conducted and nests avoided; wetlands and marshes will be avoided
Rana boylii	foothill yellow-legged frog	CE, SSC	Rocky streams in a variety of habitats, including habitats such as valley foothill hardwood, valley-foothill riparian, coastal scrub, mixed conifer, mixed chaparral, and wet meadows	High - Occurrence documented within project area	Low – Can be identified and avoided with training, work would primarily be conducted by hand avoiding potential for impacts to this species,

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Rana draytonii	California red-legged frog	FT, SSC	Breeds in ponds/slow moving streams, may use grassland and oak woodland for dispersal and foraging	Moderate - Suitable streams and ponds mapped within project area	Low – Can be identified and avoided with training, work would primarily be conducted by hand avoiding potential for impacts to this species,
Reithrodontomys raviventris	salt-marsh harvest mouse	FE, CE, FP	Marshes and wetland edges	None - No suitable habitat included in project area	None
Spirinchus thaleichthys	longfin smelt	FC, CT	Aquatic	None - No suitable habitat included in project area	None
Strix occidentalis caurina	northern spotted owl	FT, CT	Dense canopies of mature and old-growth forests. Nests in tree hollows	High - One activity center documented overlaps a portion of project area	Low – Work would occur outside nesting season or surveys would be conducted and nests avoided, removal would focus on small trees and hazardous fuels; healthy, mature trees would not be removed; removal of larger hazard trees would not occur without consultation with a qualified biologist

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[8]		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Equipment and vehicles for roadside vegetation thinning activities would operate from existing roadways. The project would not include intense ground disturbing activities (e.g., off-road equipment use, discing). While some hand pulling of invasive species may occur, the potential to disturb cultural resources is generally low since this work results in little ground disturbance and no heavy equipment. Workers would participate in a cultural training prior to project implementation (CUL-1). If a previously unidentified cultural resource, including human remains, is discovered, work would halt in the area and the resource would be fully avoided and appropriate notification would occur (CUL-2). Significant impacts on cultural resources and human remains would not occur.

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

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

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

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

Soil erosion and loss of topsoil could occur during manual and mechanical vegetation cutting and removal through the exposure of bare soils. After the vegetation thinning is completed,

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

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

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

Vegetation thinning activities would involve manual and mechanical vegetation removal along roadways. Use of vehicles and equipment during these activities and vehicle travel to project sites would generate some greenhouse gas (GHG) emissions, but not in significant quantities due to the limited duration and types of activities[9]. The project would involve vegetation thinning and would not remove any healthy, mature trees. Thinning can result in greater sequestration rates by reducing competition for the larger, more resilient trees (CAL FIRE, 2018). These processes are not quantified but would fluctuate during initial treatment and future maintenance. Due to the current higher fuel loads, it is anticipated that a net release of carbon from removal of vegetation could occur, at least in the near-term as the ecosystem fuel loads are restored closer to pre-fire suppression conditions and wildland fire risk is minimized while ingress and egress is improved. The fluctuation would be insignificant compared to overall carbon stock in Marin County. Significant greenhouse gas emission impacts would not occur.

Hazards and Hazardous Materials		
Question	**Yes**	**No**
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

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

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

disturbed and would not pose a risk to the environment or public. Vegetation management crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). Significant impacts related to hazards and hazardous materials would not occur.

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

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

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

Implementation of roadside vegetation thinning activities would not involve any new development or changes to land uses that could physically divide a community. The project is consistent with Novato Ordinance 2019-2 Fire Code, 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?	☐	☒

Vegetation removal activities would not result in the loss availability of a known mineral resource because the work would occur along and within up to 100 feet of existing roadways and would not permanently alter any features. Vegetation clearance is intended to improve evacuation and ingress/egress and increase defensible space between communities and open space and would not alter land uses, access, or subsurface areas that could impact mineral resources.

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

The proposed vegetation thinning activities would occur during weekdays from 8:00 am to 5:00 pm. This timeframe would conform with the appropriate noise ordinance (e.g., City of Novato Noise Ordinance §19.22.070, Marin County Noise Ordinance § 6.70.030(5)) [10], which limits construction activities and other related work to Monday through Friday 7:00 am to 6:00 pm and Saturday from 10:00 am to 5:00 pm for the City of Novato Noise Ordinance and 9:00 am to 5:00 pm for the Marin County Noise Ordinance. Work would progress along the roadways, limiting noise in any one location to a few hours. Measures to minimize noise disruption to nearby neighbors would be implemented, as needed (NOI-1). Exceedances of local noise standards would not occur (given the short duration of noise generation in any one location and existing noise levels) and significant noise impacts would not occur.

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

The workers implementing the roadside vegetation clearance are anticipated to be sourced from existing contractor crews in the region. As such, this project would not induce population growth. No impact related to population and housing would occur.

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

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

Recreation		
Question	**Yes**	**No**
Relevant to the project?	☒	☐

[10] 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.

Potential for significant impact?	☐	☒

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

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

A maximum of 16 workers across two crews could be conducting vegetation management activities along roadways in the Novato Zone in a single day. An estimated 12 to 32 daily one-way vehicles trips would occur, which would not exceed the screening threshold of 110 trips per day[11]. The VMT associated with implementation of the project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b). No significant traffic impacts would occur.

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

Biomass generated from vegetation thinning activities would be processed using a chipper. Some materials may be broadcasted at the work areas. An estimated 50 cubic yards of chipped material would be generated a day. As the vegetation grows back and follow up maintenance is conducted in future years, additional vegetative materials would be chipped and hauled away. Materials would be hauled to West Marin Compost and the Redwood Landfill, which have a combined permitted capacity of 3,500 tons per day and would be able to accept the chipped material (CalRecycle, 2021). No impact related to utilities and services systems would occur.

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

[11] 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.

Some of the roadways identified for vegetation clearance and maintenance are within the State Responsibility Area (SRA), but most of the roadways are within the Local Responsibility Area (LRA). Several roadways are located within or adjacent to areas identified as very high fire hazard severity zones (CAL FIRE, 2007/2008). The purpose of the project is to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur. As stated above, vegetation management crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). As discussed previously, emergency access would be maintained and the project would not impair an adopted emergency response plan or evacuation plan, but would rather enhance evacuation. The project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The project does not involve intense ground disturbing activities or off-road vehicle use that could result in downslope or downstream flooding or landslides should a wildfire occur.

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Figure 1 Project Roadways

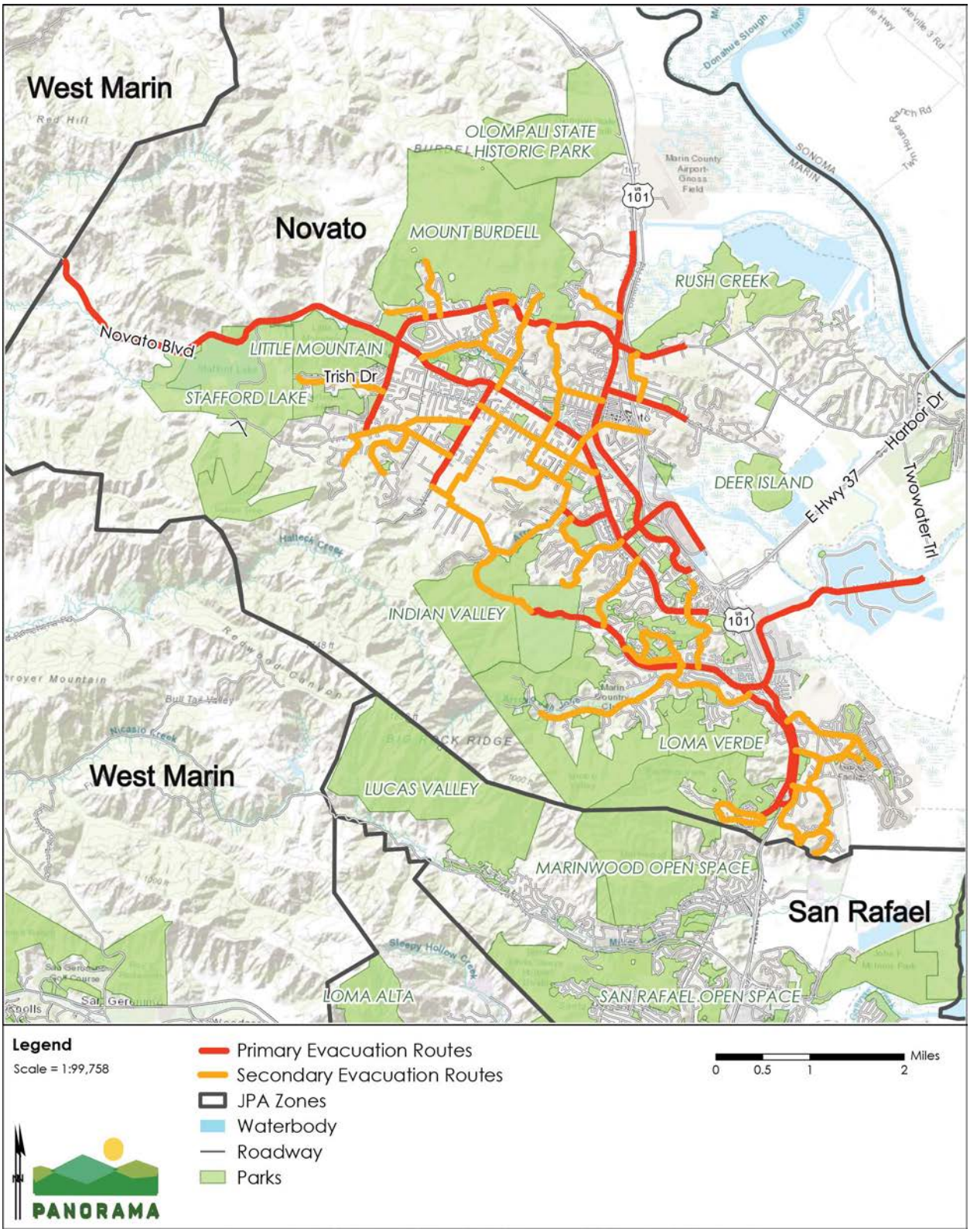
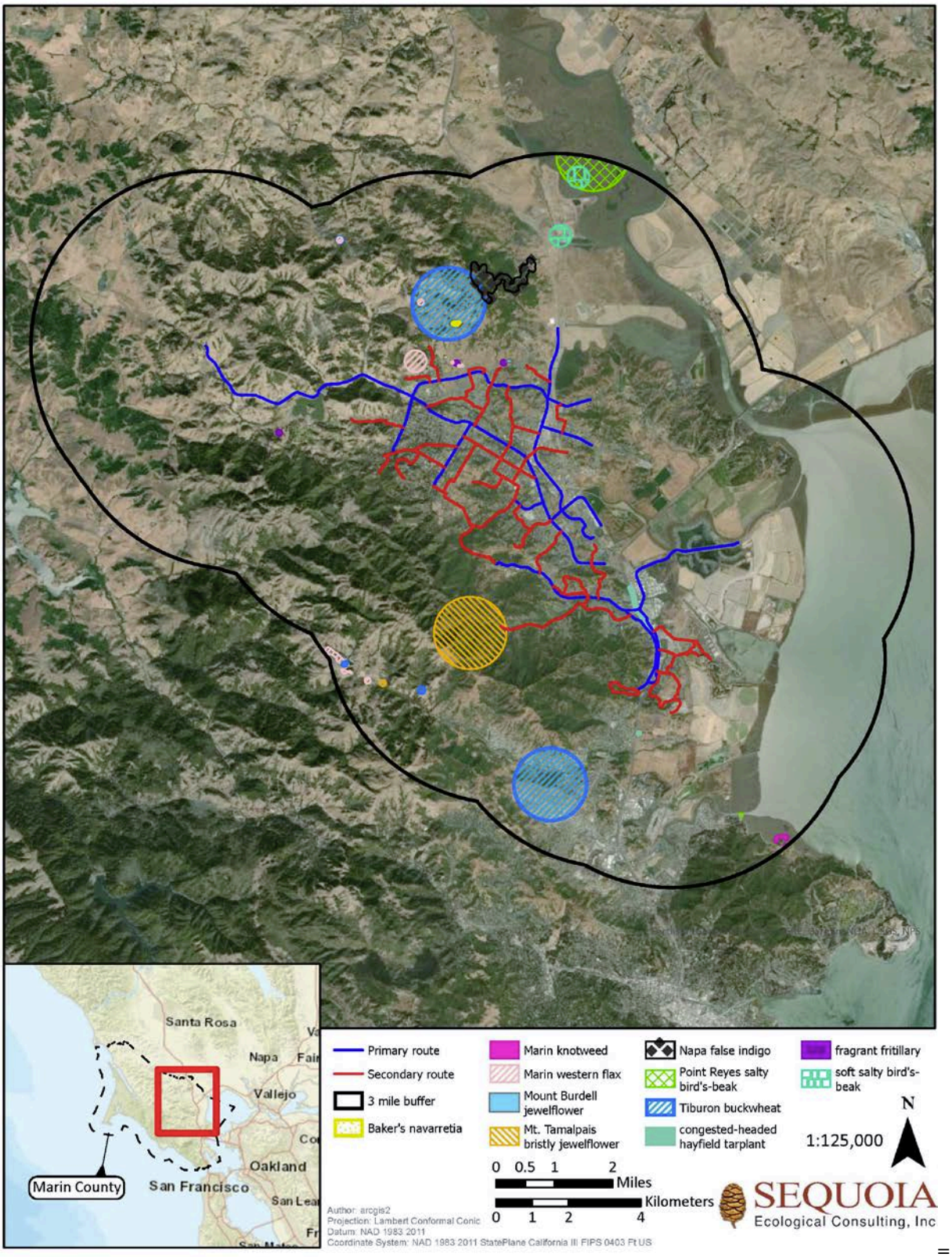


Figure 2 Special-Status Plant Occurrences



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Figure 3 Special-Status Wildlife Occurrences

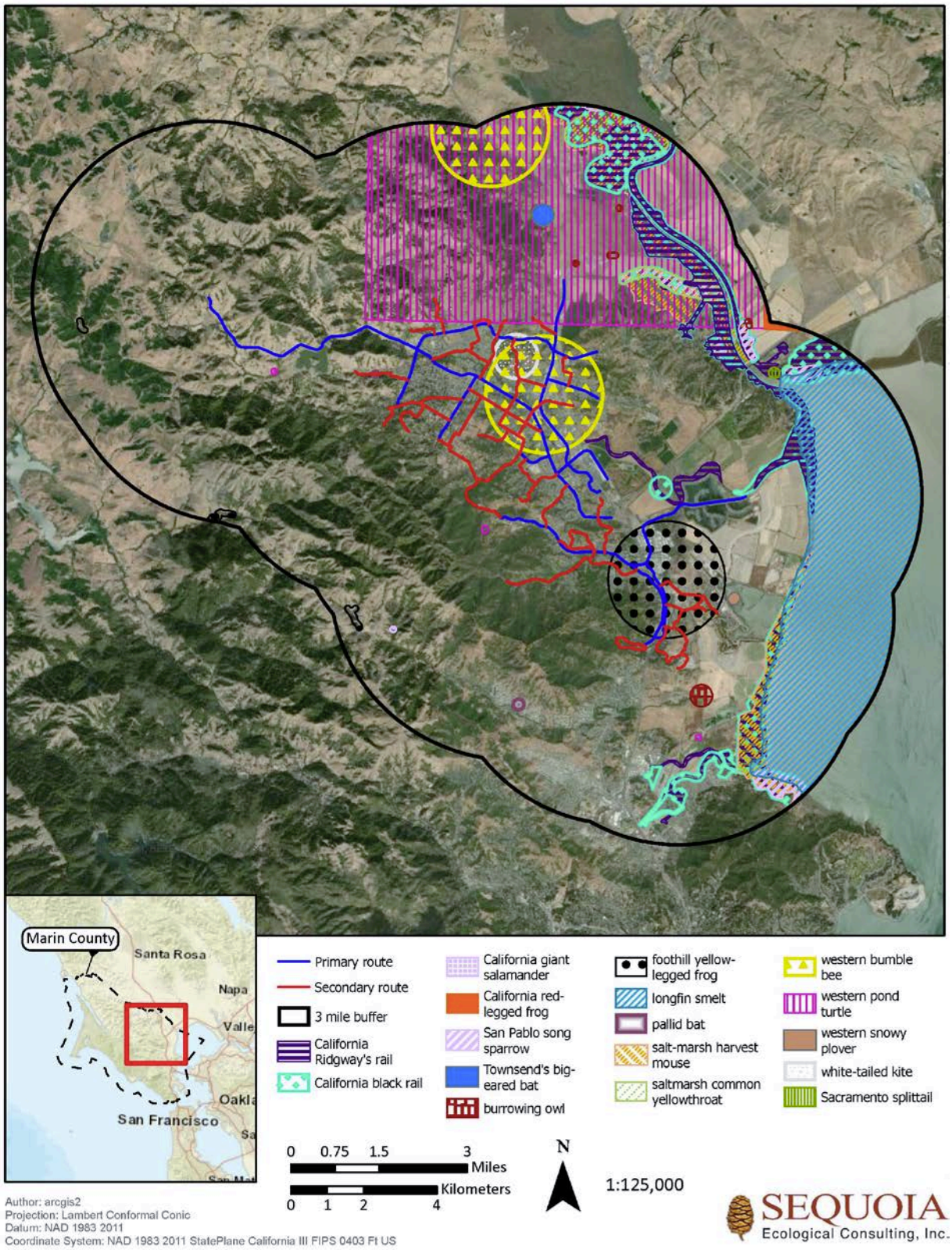


Figure 4 Wetlands and Waterways

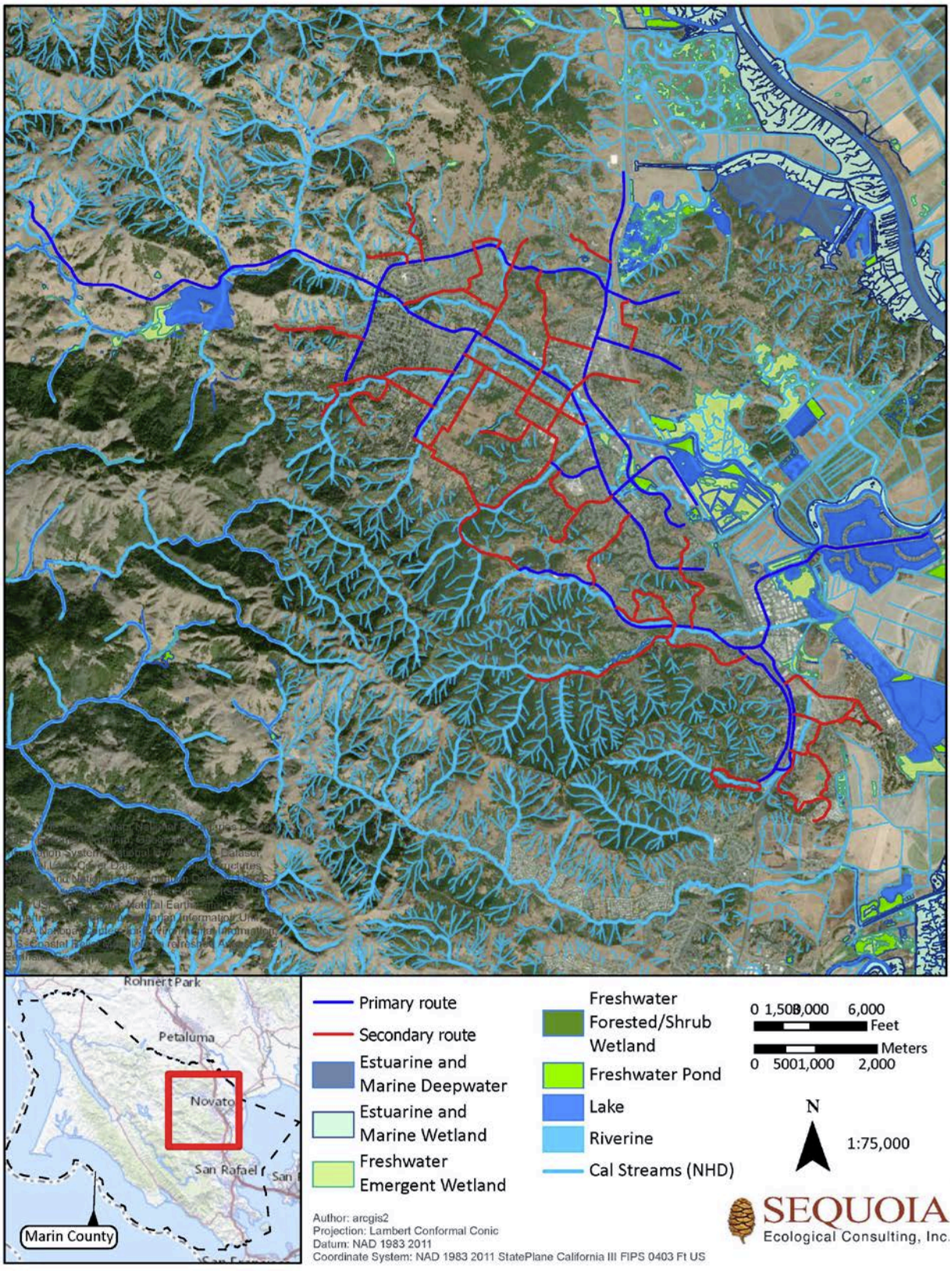


Figure 4 Serpentine Soils

