

**ATTACHMENT A: BOLINAS EUCALYPTUS REMOVAL PROJECT INITIAL STUDY  
SCHEDULE AND BUDGET**

Ms. Rachel Reid  
Environmental Planning Manager  
Marin County Community Development Agency  
3501 Civic Center Drive, Suite 308  
San Rafael, CA 949038

December 2, 2025

**SUBJECT: PROPOSAL TO PREPARE CEQA INITIAL STUDY FOR BOLINA EUCALYPTUS  
REMOVAL AND RESTORATION PROJECT**

Dear Ms. Reid;

Grassetti Environmental Consulting (GECo) appreciates the opportunity to present this proposal for preparation of the California Environmental Quality Act (CEQA) Initial Study (IS) for the Bolinas Eucalyptus Removal and Restoration Project ("Project"). We understand the property is owned primarily by the Bolinas Community Public Utilities District (BCPUD) and also includes parcels under private ownership. We understand that the applicants include both the BCPUD and the other landowners. The CEQA lead agency is the Marin County Community Development Agency (MCCDA).

We understand the proposed project to consist of removal of approximately 1150 mature eucalyptus trees on about 18 on parcels totaling about 100 acres, and implementation of a subsequent restoration plan near the town of Bolinas in unincorporated western Marin County. The restoration plan would create oak savanna, grasslands, pollinator prairie, oak woodland, coastal scrub, and wetland/wet meadow areas. The application includes a restoration plan and plant palette, but no details of any grading, construction information, or adaptive management plan. Such information would be required to complete this work.

The eucalyptus trees on the site have been identified as an important component of monarch butterfly overwintering in the Bolinas area. The restoration plan in part responds to the loss of monarch butterfly habitat that would result from removal of the large eucalyptus trees. The applicant also submitted arborists' studies and butterfly expert reports regarding the site.

We also understand that two ongoing projects may affect the project considered in this IS. These are an ongoing study by the Bolinas Fire Protection District which would remove 50-100 of the trees that pose hazards to the roadway passing through the site, as part of a CEQA exemption

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enacted for fire protection projects by the Governor. The second is a proposed BCPUD bicycle path that would cross the grove, which may require removal of another approximately 11 trees to avoid root damage to the pathway.

At the County's request, we are proposing to prepare an IS to determine whether a Mitigated Negative Declaration (MND) or focused Environmental Impact Report (EIR) is the appropriate CEQA pathway for the project. Should our review identify potentially significant impacts that cannot clearly be mitigated to a less-than-significant level, we will inform your staff immediately and work with you to revise the work scope and cost estimate accordingly.

Our proposed scope, of work, budget, and schedule are described below.

### **PROJECT APPROACH AND SCOPE OF WORK**

#### **PROJECT APPROACH**

A number of technical studies have been prepared by/for the applicant. Our approach will be to conduct peer reviews of the biological resources studies and identify any additional necessary site-specific analyses. The peer reviews will check for data gaps, fill in those gaps as feasible from existing available information, review and update sensitive species lists as necessary, and assimilate the various biological resources reports into a biological resources memo and the IS section. At that point the MCCDA would determine whether our consultants or the applicants would prepare the needed additional studies.

Richard Grassetti, GECo Principal, will manage preparation of the IS. ALTA Archaeological Consulting will prepare the Cultural and Tribal Resources assessments (based on Assembly Bill [AB] 52 consultation in progress by County staff). Geoffrey Hornek, Atmospheric Scientist, will prepare the Air Quality/GHG and Noise sections of the IS. Cassie Pinnell of Vollmar Natural Lands Consulting will manage preparation of the biological resources section of the IS.

#### **SCOPE OF WORK**

GECo will perform all work necessary to prepare and submit a complete Initial Study to satisfy CEQA requirements

**TASK 1. Project Start Up/Project Description:** GECo's Project Manager will meet with County staff to gather relevant information. After reviewing available information and plans, we will prepare a data request memo to obtain additional information required to prepare the Project

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Description and environmental analyses. Our Project Manager will conduct a field reconnaissance of the project site. Once the additional information from the applicant is received, we will then prepare the preliminary IS Project Description for your review. County comments on the preliminary Project Description will be addressed and the final project description will be prepared for use in the IS. Prior to the project description being deemed final and the environmental impact analysis being initiated, the County will send the draft project description to the applicant for review and confirmation on accuracy and completeness.

**Deliverables:** electronic versions of preliminary and final project descriptions, including figures.

**TASK 2. Prepare Administrative Draft Initial Study:** Upon completion of the final Project Description, we will develop responses to all issues identified in the current CEQA checklist. These responses will explain the potential impacts and identify applicable mitigations for all items on that list, and a discussion of the Mandatory Findings of Significance. This IS will use the County's Checklist form. The technical analyses will be prepared on the basis of existing available information and additional information to be provided by the applicant, and the following additional studies:

**A. Aesthetics.** GECo will take up to 6 photographs of the site and describe existing site visual characteristic, prominent viewpoints of the site, and potential sensitive receptors to aesthetic changes. Based on this information, we will qualitatively describe the project's effects on views from sensitive vantage points and determine the impact's significance on these views. We assume that no night-lighting is proposed for the proposed tree removal and restoration plan, and no lighting analysis is proposed in this scope. No photo-simulations are proposed.

**B. Air Quality and Greenhouse Gasses.** The project will be primarily tree removal with some associated grading for the restoration plan, and will have no post-project operational emissions. Quantification of air pollutant, toxic air contaminant (TAC) and greenhouse gas (GHG) impacts will be done in accordance the Bay Area Air Quality Management District CEQA *Air Quality Guidelines* screening methodology. The CalEEMod model will be used for the removal/restoration equipment emissions estimates as initialized with project-specific equipment/phasing data provided by the project engineer/contractor. Exposures of nearby existing pollutant-sensitive receptors (i.e., existing residences to the north of Mesa Road) to TACs from project sources will be estimated by the application of Bay Area Air Quality Management District (BAAQMD) screening models. The significance of all identified impacts will be evaluated using the criteria developed by the BAAQMD. Strategies for mitigating any removal/restoration-phase impacts will be developed/identified.

### **C. Biological Resources:**

The applicant has prepared biological resources and arborist's studies for the site. Our approach to this project is to peer review and incorporate those studies into the IS document and identify any other such studies that may be required at this time. Any additional studies determined to be required would be conducted either by the applicant or by our team under separate contract.

The various biological resources reports prepared by the applicant's consultants will be reviewed by Vollmar Natural Lands Consulting's (VNLC) biologists, and summarized in the Biological Resources section of the draft IS. We will identify impacts and mitigation measures based on the findings of the available biological studies and proposed additional surveys. This work will include the following sub-tasks:

#### ***Task 1. Database and Literature Review***

The most recent version of appropriate databases (such as California Natural Diversity Database, California Native Plant Society, and U.S. Fish & Wildlife Service Information for Planning and Consultation) will be reviewed, as well as relevant prepared reports provided by the client, including but not limited to the Biological Report produced by WRA in 2023, the two existing reports detailing butterfly occupancy, and the arborist reports that detail the condition and status of the grove. The review will serve to determine the location of documented special-status plant and wildlife species relative to the project site, especially given that more than 1,000 monarch butterflies (*Danaus plexippus*) were documented within the grove in 2023. Additional information reviewed will include the habitat types present on and bordering the site, the potential for other special-status plant and wildlife species to be impacted by the proposed project, and the potential for any potentially jurisdictional resources (e.g., wetlands, drainages) or sensitive plant communities to be impacted by the proposed project.

#### ***Task 2. Identify and Address Data Gaps***

If the literature review does not contain sufficient information on existing conditions, potential for resources to occur, or potential impacts of the proposed project, we will gather and compile information. This would include a site visit to verify field conditions and ensure they have not changed since WRA completed its assessment in 2023.

#### ***Task 3. Preparation of the Initial Study Checklist Section***

This task includes drafting the biological section of the IS/MND report, which will describe the biological resources occurring on and bordering the project site as

mentioned above, with other sections including plant communities; special-status plant or wildlife species occurring or potentially occurring; opportunities the site provides for wildlife movement to surrounding habitat; sensitive and/or jurisdictional habitats; and protected trees. The section will address any potential impacts to biological resources and will recommend measures to mitigate potential impacts. This task will also include client communication, and/or communication with authors of project technical studies to ensure clear project understanding, history, and coordination, client review and edits, and response to comments.

**D. Cultural Resources:** Alta Archaeological Consulting will prepare a cultural resources inventory report for the proposed project site. The archaeological survey studies will be designed to meet the requirements of CEQA, and the responsibilities codified in Public Resource Code sections 5097, and its implementing guidelines 21082 and 21083. The scope of work for the two additional surveys includes: (1) background research, (2) review Native American communication and outreach as appropriate, (3) field survey, and (4) preparation of an Archaeological Survey Report, as detailed below. It is assumed that the County's cultural resource specialist will conduct the AB 52 consultations for the project.

***Task 1. Background Research and Literature Review***

ALTA will perform a records search at the California Historical Resources Information System, Northwest Information Center (NWIC). The purpose of archival research is to identify any previously conducted archaeological surveys or known archaeological sites located on the subject properties and within a one-quarter mile radius of the project area(s). In addition, ethnographic and historic literature will be reviewed to create background contextual information relevant to the project area.

***Native American Outreach***

ALTA will contact the Native American Heritage Commission (NAHC) to request a search of the Sacred Lands file for the area and project a list of tribal contacts with ancestral affiliations to the area. ALTA will provide the list of individuals and groups identified by the NAHC to MCCDA staff, who will conduct tribal outreach to solicit their input. Interested parties may be invited to participate in the field survey. Comments and information provided by the Native American community and government agencies will be provided in the draft and final reports.

We understand that the County will conduct AB 52 consultation with the Federated Indians of the Graton Rancheria (FIGR) and other interested tribes to inform them of the proposed project and solicit input regarding tribal knowledge of cultural resources that

may be within the project area. A FIGR tribal representative will be invited to participate in the field survey. Comments and information provided by the Native American community and government agencies will be provided in the report to FIGR.

***Task 2. Field Survey***

ALTA staff will conduct an on-site field cultural resources reconnaissance of the site in coordination with the Environmental Planning staff archaeologist. In accordance with established standards, field reconnaissance will be conducted using transects spaced no more than 10 meters apart. Any artifacts or cultural materials identified will be logged in the field prior to returning them to the hole for reburial. No materials will be collected as part of the field work.

All resources identified within the project area will be recorded using the standard *State of California Department of Parks and Recreation Archaeological Site Forms*. (Note: recordation would be an optional task) As cultural resources are located during survey, approximate boundaries will be delineated and the location of the resource plotted on topographic maps. Site recordation will include site and feature mapping, completing of site record forms, and digital photography. An evaluation of the potential impacts will be conducted for each resource in the project areas.

***Task 3. Archaeological Survey Report***

ALTA will prepare an Archaeological Survey Report (ASR) in accordance with the standard guidelines in *Archaeological Resource Management Reports*. The ASR will include a summary of the identification efforts undertaken in the study, consultation with agencies and local governments, provide a summary of archaeological methods and findings, and make preliminary recommendations for appropriate treatment and/or evaluation of resources. The report will be CEQA-level and is not intended for Section 106 compliance.

This report will be summarized in the IS cultural resources section, along with any recommended mitigation measures.

**E. Hydrology and Water Quality.** We will describe erosion issues and any erosion control plans for soil disturbance and grading based on information to be provided by the project applicants. Available Federal Emergency Management Agency Flood Hazard maps also will be summarized. The County's Stormwater Ordinance will be summarized as applicable to the proposed project. Project erosion/sedimentation potential and any necessary additional mitigation measures will be identified.

**F. Land Use and Planning.** We will summarize applicable plans and policies from the Countywide Plan. Compliance with County zoning also will be addressed.

**G. Noise.** Noise impacts will be evaluated according to the policies and standards specified in the Marin County General Plan and Noise Ordinance. Analysis will be in accordance with the methodology developed by the appropriate regulatory agencies (i.e., the U.S. Environmental Protection Agency, Federal Highway Administration [FHWA], etc.). The noise setting will briefly summarize acoustical terminology, define the physical characteristics of sound and its aspects that produce environmental noise impacts, and define the appropriate quantitative descriptors of noise impact for this project. Short-term noise measurements will be taken near the closest residential receptors (i.e., existing homes north of Mesa Road) to characterize daytime ambient noise levels/variations experienced on/near the Project site. Potential noise impacts from tree removal and restoration activity will be evaluated based on the project schedule and equipment use (as specified by the project engineer/contractor) using the FHWA construction equipment noise model. Impact significance will be determined by relating project activity noise levels to the requirements of the County Noise Ordinance. Where significant activity noise impacts are found, appropriate mitigation strategies (e.g., sound barriers/berms, restriction of activity hours, etc.) will be proposed.

**H. Mitigation Monitoring and Reporting Program (MMRP).** If the Initial Study leads to a MND, we will prepare an administrative draft MMRP in the County's standard template as an appendix to the administrative draft IS (ADIS). If an EIR is required, this task will be deferred to the Final EIR task under a new expanded contract.

**Deliverables:** Electronic files of ADIS text and figures.

**TASK 3. Prepare Screencheck Draft Initial Study:** Within 10 days of receipt of all County comments on the ADIS, we will revise that document and prepare a Screencheck Draft IS, which would be a pre-print version for final review by the County. This task assumes a maximum of 20 hours of time responding to staff comments and revising the IS.

**Deliverables:** Electronic copy of Screencheck Draft IS (Word and PDF)

**TASK 4. Prepare Public Draft Initial Study:** After County review of the screencheck draft IS, we will prepare the Public Draft IS, incorporating any final County revisions.

**Deliverables:** Electronic copy of Public Draft IS (Word and PDF)

**TASK 5. Prepare Administrative Final IS, including Responses to Public Comments (RTC) and Administrative Final MMRP:** We will prepare responses to public comments (i.e. State Clearinghouse comments and general public comments) on the Draft IS, as appropriate, to be included in the Final IS appendix. We also will prepare a Final MMRP as part of the Final IS. This proposal assumes a maximum of 40 hours of staff time for responding to comments and revising the Draft IS. If heavy comments are received and/or comments require additional technical studies, we will address those comments as an extra-service item.

**Deliverables:** Electronic copy of the Administrative Draft RTC and MMRP (Word and PDF)

**TASK 6. Prepare Final IS:** After County review of the Administrative Final IS (including the RTC and MMRP), we will prepare the Final IS, incorporating any final County revisions.

**Deliverables:** An electronic copy (PDF) and one hard copy of the Final IS will be provided to the County.

**Task 7. Meeting Attendance:** Assumes up to four virtual meetings with staff on the project.

## ASSUMPTIONS

This scope of work and attached budget assume the following:

- One administrative draft and one screencheck Draft and Final IS; additional rounds of review would be covered by the required contingency fund, as needed.
- The scope of work does not include any technical studies not listed in our work scope. It is assumed that the applicants will be responsible for providing any additional biological resources reports, and for providing additional information on the project, including details on construction of the restoration plan
- Budget assumes that no more than 20 hours of response preparation time will be required for Task 4. Additional time required to complete this task would need to be covered by the contingency fund.
- The County will prepare, post, and distribute all notices and IS documents.
- The County will compile all comments on the ADIS into a single comment set.
- The proposed scope of work does not include focused biological studies or surveys, such as a jurisdictional wetland delineation or focused plant or wildlife surveys.
- If heavy comments are received on the Draft IS and/or those comments require additional technical studies, we will address those comments as an extra-service item.

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- Assumes that the IS may result in a MND or a Focused EIR. If during the process it is determined that an EIR is required for the project, then the consultant's contract scope will be amended accordingly and a consultant contract amendment will be prepared and processed.
- Assumes that the cultural resources reports will be CEQA-level and not for Section 106 compliance.
- The County will handle AB 52 notifications and will coordinate the tribal consultation process.
- The County will prepare all the noticing, coordinate public distribution of the draft CEQA document, compile public comments for the consultant, and handle communication with the State Clearinghouse (SCH).
- No hard copies of documents will be required.
- Assumes up to four meetings with staff.
- Includes a 10% contingency fund as requested by the County. Contingency funds that have been unused following project approval will be refunded to the applicant.

### **AUTHORSHIP**

The County of Marin shall have full authority for final approval of all documents presented for public review for the purposes of the California Environmental Quality Act (1970, as amended), and to finalize the scope and level of detail necessary to meet County and professional CEQA-practitioner standards.

Please feel free to contact me at (510) 849-2354 to discuss any aspect of this proposal. I look forward to the opportunity to working with you and your staff on this project.

Sincerely,



Richard Grassetti  
Principal

Attachments: Schedule and Budget

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### ATTACHMENT A: SCHEDULE

The schedule for the IS will be dependent on receipt of all necessary project description information from the County. We will complete the ADIS within six weeks after receipt of all necessary information. As noted above, the Public Draft IS will be prepared within two weeks of receipt of all of the County's comments on the ADIS. Responses to comments will be provided in a timely manner as needed by the County. Our schedule for the IS is shown on the table below:

Task/Milestone	Timing	Cumulative Weeks
Task 1: Start-Up/Site Visit/Document Review	2 weeks from formal authorization to proceed	2
Task 2: Prepare Administrative Draft Initial Study	7 weeks from completion receipt of plans and background documents.	9
Staff Review of ADIS	2 weeks	11
Task 3: Prepare Screencheck Draft IS	2 weeks after receipt of all County comments on the ADIS	13
County Review of Screencheck Draft IS	2 weeks	15
Task 4: Prepare Public Draft IS	2 weeks from receipt of all County comments on the Screencheck Draft IS	17
	30-day review period	21
Task 5: Prepare Administrative Final and Final IS	3 weeks from receipt of all public and agency comments	24
County Review of Administrative Final IS	2 weeks	26
Task 6: Prepare Final IS/ MMRP	2 weeks from receipt of all County comments on Administrative Final IS/ MMRP	28
Task 7: Meetings	As scheduled	

## **ATTACHMENT B. BUDGET AND RATES**

**Initial Study:** GECo will prepare Tasks 1-7 outlined above fee not to exceed \$66,088 including the 10% County contingency fee. The detailed cost breakdown is provided on the following page, in Attachment A. It provides our best estimate of the labor effort and direct costs necessary to complete the scope of work, as described above. We have included a contingency line item to cover the cost of unforeseen work. Work under the contingency budget would proceed only upon written authorization by the County and any unused remainder of contingency funds would be refunded by the County to the applicant at the conclusion of the environmental review process. Costs will be billed on a milestone basis as described below:

### Milestone Billing Schedule

- 25% upon award of contract;
- 45% upon submission and acceptance by the County of the Administrative Draft Initial Study;
- 15% upon completion and acceptance by the County of the public Draft Initial Study; and
- 15% upon adoption of the Mitigated Negative Declaration or determination by decisionmakers to require an EIR for the project.
- If the project is withdrawn during the work effort described in this proposal, work shall be billed to the completion of the milestone task underway at the time of project withdrawal.

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## BUDGET DETAIL

### Task 1: Project Startup/Project Description

R. Grassetti	30 hrs @ \$185/hr	\$5550
WP/Graphics	10 hrs @ \$75/hr	\$ 750
Expenses		\$ 200
<b>Total Task 1:</b>		<b><u>\$6500</u></b>

### Task 2: Prepare Administrative Draft IS

R. Grassetti	90 hrs @ \$185/hr	\$16,650
Alta Archaeological	\$5750+5% overhead	\$ 6000
G. Hornek (AQ/GHG/noise)		\$ 3000
C. Pinnell (VNLC- biological resources)		\$ 8500
WP/Graphics	10 hrs @ \$75/hr	\$ 750
Expenses		\$ 300
<b>Total Task 2:</b>		<b><u>\$35,200</u></b>

### Task 3: Prepare Screencheck Draft IS

Grassetti	30 hrs @ \$185/hr	\$5550
Hornek	2 hrs @ \$125/hr	\$ 250
Pinnell	2 hrs @ \$130	\$ 260
WP/Graphics	4 hrs @ \$75/hr	\$ 300
<b>Total Task 3:</b>		<b><u>\$6360</u></b>

### Task 4: Prepare Public Draft IS

Grassetti	8 hrs @ \$185/hr	\$1480
Hornek	4 hrs @ \$125/hr	\$ 150
Pinnell	2 hrs @ \$130	\$ 260
WP/Graphics	2 hrs @ \$75/hr	\$ 150
<b>Total Task 4:</b>		<b><u>\$2040</u></b>

### Task 5: Prepare Administrative Final and Final IS and MMRP

Grassetti	40 hrs @ \$185/hr	\$7400
Hornek	4 hrs @ \$125/hr	\$ 500
Pinnell	4 hrs @ \$130/hr	\$ 520
Graphics/WP	6 hrs @ \$75/hr	\$ 450
<b>Total Task 5:</b>		<b><u>\$8870</u></b>

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**Task 6: Meetings**

Grassetti (4 virtual meetings) 6 hrs @ \$185/hr \$1110

**Total Task 7:** \$1110

**Total without Contingency:** \$60,080

Contingency (10%): \$6008

**Total All Tasks and Contingency:** \$66,088