

## Notice of Exemption

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

**From (Public Agency):**  
Marin Wildfire Prevention Authority  
1600 Los Gamos Dr., Suite 345  
San Rafael, CA 94903

**Project Title:** West and Southern Marin Zones Coastal Evacuation Routes Project

**Project Applicant:** Marin Wildfire Prevention Authority

**Project Location – Specific:** Vegetation thinning and removal within typically 10 feet, but up to 25 feet, from road edge along prioritized roadways throughout Muir Beach, Mill Valley, Stinson, Bolinas, Olema, Seahaven, and Inverness in coastal Marin County

**Project Location – City:**  
West and Southern Marin County

**Project Location – County:**  
Marin County

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

The purpose of the proposed project is to improve vegetation clearance along fire roads and evacuation routes to provide better access for first responders and emergency vehicles. The purpose of the evacuation route treatments would also include evacuation and ingress/egress throughout the communities in coastal Marin for safer evacuation for residents and visitors. The proposed project would also improve access by reducing heat, flame, ember, and smoke impingement on roadways for evacuating residents and emergency responders in the event of an approaching wildfire. Many of the communities and neighborhoods served by this project are registered firewise<sup>1</sup> communities (Fire Safe Marin 2023). Creating fire-adapted communities is not only about reducing fire threat from fire growth but also improving the safety of the residents. Creating safe evacuation routes and fire roads is a critical component of a long-term fire-adaptive strategy.

**Name of Public Agency Approving Project:** Marin Wildfire Prevention Authority

**Name of Person or Agency Carrying Out Project:** Marin Wildfire Prevention Authority

### Exempt Status (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
  - Declared Emergency (Sec. 21080(b)(3); 15269(a));
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<sup>1</sup> Firewise communities are local neighborhoods or communities that have taken appropriate measures meeting specific criteria put forth by the National Fire Protection Association to become more resistant to wildfire structural damage. Firewise communities served by the proposed project include the following: Muir Beach/Green Gulch, Stinson Beach, Paradise Ranch Estates, Inverness, and Nicasio.

- 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 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 that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1 exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The proposed project would involve vegetation thinning and removal within typically 10 feet but up to 25 feet of the edge of roadways identified as key routes used for evacuation and ingress/egress in west and southern Marin County. The scope of the proposed project is consistent with a minor alteration to the condition of the vegetation along the routes as well as maintenance of the existing roadways shown in Figure 1 and Figure 2.

Additionally, no healthy, mature, scenic trees would be removed; no work would take place within sensitive habitat, including wetlands or waterways; and no ground disturbance, such as excavation, would take place. There are no facts or circumstances specific to this project that would support an exception to the categorical exemption. No exceptions listed under Section 15300.2 apply.

**Lead Agency Contact Person:**  
Mark Brown, Executive Officer

**Area Code/Telephone/Extension:**  
(415) 246-0280

**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: \_\_\_\_\_ Title: \_\_\_\_\_

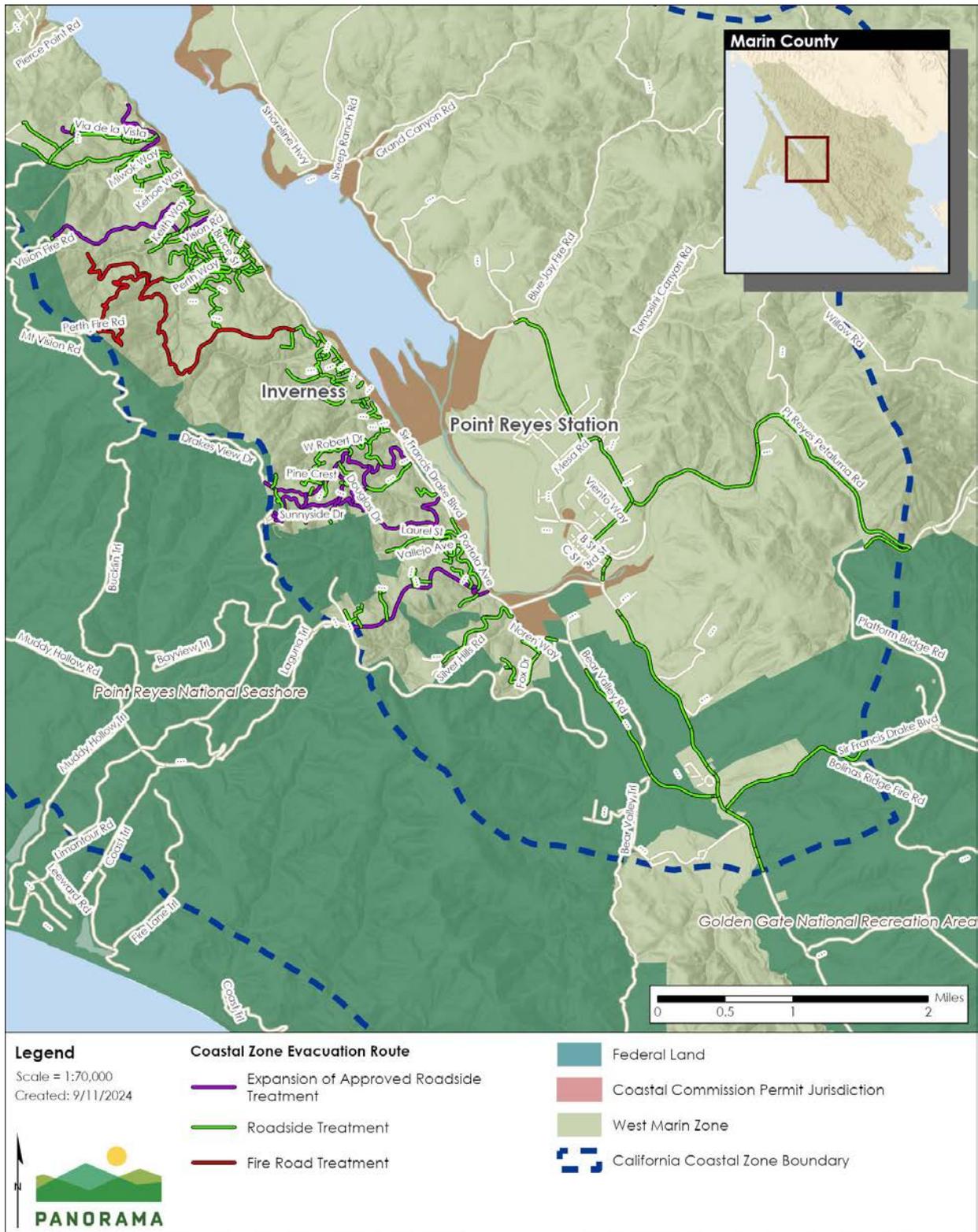
Signed by Lead Agency

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 Location - North**



**Figure 2 Project Location -South**



Date: September 19, 2024

Project: West and Southern Marin Zones Coastal Evacuation Routes Project

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### **Categorical Exemption Summary**

The Marin Wildfire Prevention Authority (Marin Wildfire) as the lead agency has determined that the West and Southern Marin Zones Coastal Evacuation Routes Project (proposed 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 that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1 exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.

The proposed project would involve vegetation thinning and removal within typically 10 feet but up to 25 feet of the edge of roadways identified as key routes used for evacuation and ingress/egress in west and southern Marin County. The scope of the proposed project is consistent with a minor alteration to the condition of the vegetation along the routes and maintenance of the existing roadways shown in Figure 1 and Figure 2.

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

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

### **Background**

Marin County voters passed Measure C in 2020, which established a 17-member Joint Powers Authority, Marin Wildfire, 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. Marin Wildfire was formed to develop and implement a comprehensive wildfire prevention and emergency preparedness plan throughout almost all of Marin County. This proposed project is a Core Project that is funded by and within the purview of Marin Wildfire. Core Projects include those projects that focus on wildfire detection, notification, and evacuation; vegetation management and fire hazard reduction; grants management; and public education.

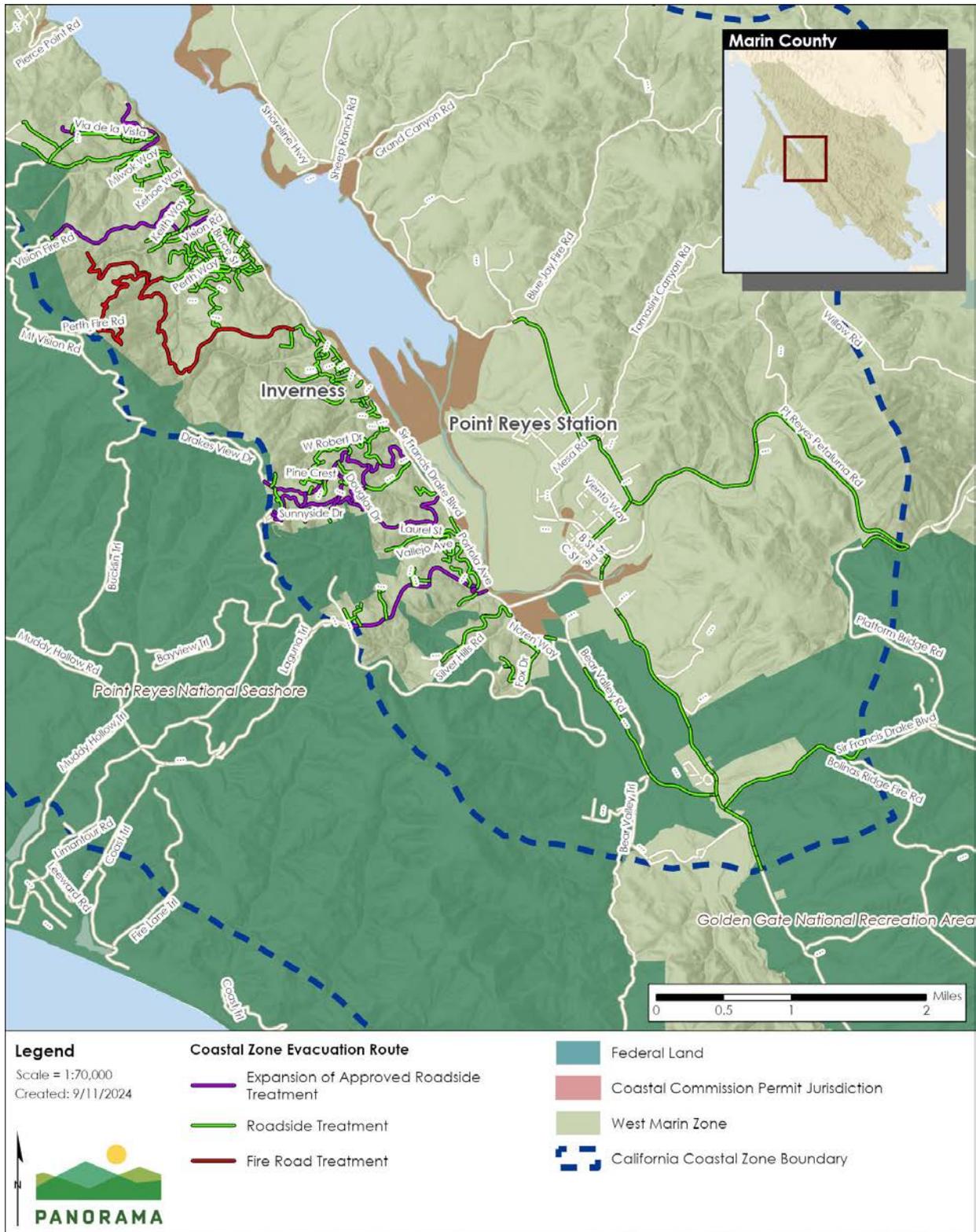
In 2021, the West Marin Zone Evacuation Route Core Project was approved and aimed at improving evacuation routes and ingress/egress along prioritized roads in Inverness, Tomales, Bolinas, Stinson, Nicasio, Point Reyes, Olema, and the San Geronimo Valley in the West Marin Zone.

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Figure 1 Project Location – North



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**Figure 2 Project Location -South**



## West and Southern Marin Zones Coastal Evacuation Routes Project - Marin Wildfire Prevention Authority

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The project involved vegetation removal up to 10 feet from the road edge and vertical vegetation thinning to a minimum of 15 feet along a total of 24.7 linear miles of roadways to allow for safe ingress and egress of emergency personnel and residents along the road without vegetation obstruction. Approximately 14.3 linear miles of the total miles were located within the Coastal Zone under the jurisdiction of the Marin County Local Coastal Program (LCP), which triggered the need for a Coastal Development Permit (CDP). The CDP application was filed in June of 2022 and the CDP approved August 18, 2022.

## **Purpose and Need**

The purpose of the proposed project is to improve vegetation clearance along fire roads and evacuation routes to provide better access for first responders and emergency vehicles. The purpose of the evacuation route treatments would also include evacuation and ingress/egress throughout the communities in coastal Marin for safer evacuation for residents and visitors. The proposed project would also improve access by reducing heat, flame, ember, and smoke impingement on roadways for evacuating residents and emergency responders in the event of an approaching wildfire. Many of the communities and neighborhoods served by this project are registered firewise<sup>1</sup> communities (Fire Safe Marin 2023). Creating fire-adapted communities is not only about reducing fire threat from fire growth but also improving the safety of the residents. Creating safe evacuation routes and fire roads is a critical component of a long-term fire-adaptive strategy.

## **Project Description**

### **Treatment Area**

The proposed activities would be completed along prioritized roadways throughout Muir Beach, Mill Valley, Stinson, Bolinas, Olema, Seahaven, and Inverness in coastal Marin County as shown in Figure 1 and Figure 2. Under the proposed project, the previously approved coastal zone vegetation treatments (along approximately 14.3 miles<sup>2</sup> of roadways) under the West Marin Zone Evacuation Route Core Project would be expanded to allow treatment up to 25 feet from road edge, as opposed to the previous maximum treatment area of 10 feet from road edge. Additionally, the proposed project activities include approximately 6 miles of fire road treatments and approximately 70 miles of new roadside treatment areas to improve safe ingress and egress.

The proposed project is within the Coastal Zone under the jurisdiction of the Marin County LCP that governs development in the coastal areas of Marin County. The proposed project is exempt from a CDP as it is considered a repair and maintenance project (Marin Municipal Code § 20.68.050). Treatment activities would typically avoid environmentally sensitive habitat areas

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<sup>1</sup> Firewise communities are local neighborhoods or communities that have taken appropriate measures meeting specific criteria put forth by the National Fire Protection Association to become more resistant to wildfire structural damage. Firewise communities served by the proposed project include the following: Muir Beach/Green Gulch, Stinson Beach, Paradise Ranch Estates, Inverness, and Nicasio.

<sup>2</sup> The centerlines have been corrected to align better with the true roadway alignments. Accordingly, the same approved roads are now measured to be 17.9 miles.

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(ESHA)<sup>3</sup> as defined by the Marin County LCP within the proposed project area and would otherwise comply with Marin Municipal Code § § 20.68.060K. To improve evacuation routes, invasive, non-native, and fire-hazardous vegetation and accumulated dead biomass would be reduced typically within 10 feet from the road edge, up to 25 feet. Areas where fuel treatments may need to extend beyond 10 feet from the edge of the road would be determined by a qualified professional who understands forest ecology and fuel management or a fire professional, prior to treatments. The types of topographical features (e.g., steep slopes) or vegetation fuels (e.g., dense eucalyptus or broom) present may necessitate greater treatment distances beyond 10 feet. Small trees, 8 inches diameter at breast height (DBH) and smaller, would be removed as part of treatments for ingress and egress and ladder fuel removal. In areas with eucalyptus or other fire-hazardous invasive trees, removal of trees up to 10 inches DBH may be performed. Fire road treatment would involve trimming encroaching and overhanging vegetation to maintain road access for fire equipment and emergency personnel. Hazardous trees (e.g., dead or dying trees) identified by an arborist or qualified fire professional may also be removed along this evacuation route. No healthy, mature, scenic trees would be removed under this proposed project.

### Treatment Pre-Treatment Survey and Methods

A qualified biologist would conduct a survey of treatment areas for the presence of sensitive species or vegetation communities prior to the initiation of treatment activities. If the presence of sensitive species or vegetation communities is identified, the area would be flagged for avoidance or a biologically-trained environmental monitor will be present to ensure appropriate avoidance of the identified resource. Workers would receive training from a qualified professional prior to beginning vegetation treatments for the season with refresher tailgate trainings held as needed, if certain areas are particularly sensitive. Training will include identification of special-status plant species and sensitive communities for avoidance (ET-1).

Proposed project treatments would include handheld manual and mechanical fuel reduction using chainsaws, string trimmers, pull saws, other similar handheld tools, and chippers. Crews would remove vegetation from the ground and could utilize bucket trucks to achieve the necessary vertical clearance. In some discrete locations where access is difficult or unsafe for workers, such as areas with dense poison oak, or in areas with dense brush or non-native perennial grasses, an excavator-mounted mower or masticator head on an extendable arm may be used, operating from the road prism.

Herbicides, if used, would be applied in a targeted manner. The vegetation would be cut with tools and then herbicide painted on using spot treatments such as the cut-stump or painted application methods, which have been found to have the best success rate for control of certain species, including broom (Oneto, Kyser, and DiTomaso 2010). The proposed project would use

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<sup>3</sup> Coastal Act, Public Resources Code Section 30107.5 defines ESHA as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." In accordance with the Marin County Local Coastal Program "ESHA consists of three categories wetlands, streams and riparian vegetation, and terrestrial ESHA. Terrestrial ESHA includes non-aquatic habitat that supports rare and endangered species; coastal dunes as referenced in C-BIO-7 (Coastal Dunes); roosting and nesting habitats as referenced in C-BIO-10 (Roosting and Nesting Habitats); and riparian vegetation that is not associated with a perennial or intermittent stream." (C-BIO-1).

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Garlon 4 Ultra (i.e., herbicide with the active ingredient triclopyr) and would be painted on the stumps in a targeted manner immediately after hazardous tree removal and as a follow up treatment, as needed, to kill or prevent regrowth.

Should chemical treatments be applied as part of initial or follow-up treatment, herbicide application would be implemented according to all applicable regulations. Herbicides would not be applied within 24 hours of a known rain event and signs would be posted at the project site within or adjacent to public recreation areas, residential areas, schools, or any other public areas at least 1 day prior to application and would remain posted on-site at least 1 day following application (HAZ-4).

### **Biomass Processing**

A trailer-mounted chipper with the capacity to accept up to 12-inch diameter vegetation and a chipper truck would be at all work areas. A trailer-mounted chipper or chipper truck would be operated from the roadways. An estimated 20 to 25 cubic yards of vegetative debris could be disposed of each workday from each treatment segment. Vegetative material would be fed into the chipper and the chipped material may be broadcast at work areas, where appropriate, or hauled away for disposal. Vegetation left at and spread on work areas would be chipped to less than 3 inches to minimize risk of fuel buildup and ignition. Disposal sites include West Marin Compost and Marin Resource Recovery Center.

### **Workers**

Contractors and Marin County Fire Department (County Fire) crews would conduct the vegetation removal and chipping along the specified roadways. A single contractor crew would generally consist of 3 to 6 workers. Two to three crews may operate along evacuation routes and fire roads in the Marin County Coastal Zone.

### **Site Access**

Treatment areas would be accessed via existing roads, fire roads, and trails to the maximum extent feasible. Vehicles and equipment would be staged at the contractor's yard daily.

### **Schedule and Duration**

Project activities would be conducted on weekdays from 8 am to 5 pm, starting in September 2024. Maintenance consisting of removal of newly dead and downed vegetation as well as trimming of areas with fine fuels (e.g., grasses) may occur annually based on inspections. Maintenance for roadside vegetation would occur approximately 3 to 5 years for forested and shrub areas. Treatment of invasive species, such as Scotch and French broom, would be conducted as needed.

### **Project Design and Implementation Features**

Marin Wildfire 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. The following specific design and implementation measures are part of the proposed project:

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### **CUL-1 Training<sup>4</sup>**

For all activities with the potential for ground disturbance (excluding prescribed herbivory, vegetation and tree trimming, and hand pulling smaller vegetation) all contractors and crew will receive training prepared by and/or conducted by a qualified archaeologist (who meets the U.S. Secretary of Interior's professional standards set forth in 48 FR Parts 44738-44739 and Appendix A to 36 CFR Part 61) prior to beginning work. The Tribal Heritage Preservation Officer(s) (THPO) from a local tribe (Federated Indians of Graton Rancheria [Graton Rancheria]) will be notified of the opportunity to attend and/or train crews. The training will address the potential for encountering subsurface cultural resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is identified including reporting the resource to a qualified archaeologist and/or THPO, as appropriate, and understanding all procedures required under Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains.

### **CUL-2 Unanticipated Discovery<sup>5</sup>**

In the event that a previously unidentified cultural resource is discovered during implementation of an activity all work within a minimum of 150 feet of the discovery will be halted. The resource will be located, identified, and recorded in the Marin Wildfire cultural resources GIS database.

The boundaries around the buffered resource will be temporarily marked, such as with fencing or flagging. A qualified archaeologist will inspect the discovery and determine whether further investigation is required. Data regarding archaeological resources will be kept confidential per law. As appropriate, the qualified archaeologist will inform Graton Rancheria's THPO of the discovery. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort will be required. If the project proponent wishes to continue work in the area, only work performed using hand tools or powered hand tools is allowed, work cannot include ground disturbance and the work area can only be accessed on foot as determined acceptable by the qualified cultural resource specialist/archaeologist.

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

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

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

If the resource meets the criteria for either a historical resource, unique archaeological resource, and/or tribal cultural resource, work will remain halted in the buffered area around the resource. No work will occur within the buffered area except those methods previously discussed as

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<sup>4</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>5</sup> Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

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determined acceptable by the qualified archaeologist and/or THPO or tribal monitor. After work is completed, all cultural resource delineators (e.g., flags or fencing) will be removed in order to avoid potential vandalism, unauthorized excavation(s), etc.

### **CUL-3 Cultural Resource Investigation<sup>6</sup>**

Prior to implementation of vegetation management activities that have potential for intensive ground disturbance below the ground surface, significant heat from a burn, or use of heavy equipment off established roads and trails, a qualified archaeologist will conduct a records search and/or site-specific survey of the project areas where such disturbances could occur. Monitoring may also be identified by the qualified archaeologist as an appropriate measure to avoid damage or destruction of previously documented or potential resources (e.g., areas with a high sensitivity for buried resources) if conducting activities in the vicinity (refer to CUL-5). Outreach with Graton Rancheria will be conducted as early as feasible to obtain information regarding culturally sensitive areas and/or the location of tribal cultural resources within the project areas. Graton Rancheria will be notified of the opportunity to attend any surveys or monitoring, if there is the known or potential presence for precontact resources. Any information provided by Graton Rancheria and/or tribal monitor(s) is confidential and exempt from public disclosure in accordance with statutory and regulatory requirements (Cal. Gov. Code § 6254(r), 6254.10; PRC § 5097.98(c); Cal. Code Regs. § 15120(d); 40 CFR § 1516.9; PRC § 21082.3 (c)(1)). Records searches, field survey results, and monitoring results will be shared with Graton Rancheria, as appropriate. Resources found during the records search, tribal outreach, survey and/or monitoring will be flagged for avoidance with an appropriate buffer identified by the qualified archaeologist, or the qualified archaeologist may identify modifications to the prescriptions using only hand tools or powered hand tools and access by foot with no ground disturbance, provided it would avoid all impacts to the resources. Any resource found during the site survey will be documented on California State Department of Parks and Recreation cultural resource record forms and a survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures.

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

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

### **ET-1 Environmental Training for Biological Resources<sup>7,8</sup>**

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<sup>6</sup> Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

<sup>7</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>8</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018

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

### **ES-1 Environmental Surveys for Rare Plants**

Within areas where rare and special-status plants have a moderate to high potential to occur, based on desktop data of habitat types, known site-specific information, and the professional judgment of qualified biologists, surveys will be conducted prior to any activity that has the potential to damage perennial plants or is proposed to occur during the flowering season for the specific annual plant species that has the potential to damage the flowering body and seeds of these plant species. Activities that have the potential to damage the flowering body may include but may not be limited to mowing, weed whacking, off-road vehicle and heavy equipment use, discing, and prescribed burning.

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

### **IP-1 Clean Equipment<sup>9,10</sup>**

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<sup>9</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>10</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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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<sup>11,12</sup>**

Segregate and treat soils and vegetation contaminated with invasive plant seeds and propagules. Treat, as appropriate, to prevent the spread of invasive plants. Treatment may include disposal on site within already infested areas, chipping or pile burning and mulching to eliminate viable seeds, or disposal at an approved cogeneration plant or green waste facility.

Minimize soil disturbance to the greatest extent possible to reduce the potential for introducing or spreading invasive plants or plant pathogens, to protect topsoil resources, and to reduce available habitat for the establishment of new invasive plants.

### **IP-3 Treat Invasive Plants Prior to Seeding<sup>13,14</sup>**

Schedule activities to maximize the effectiveness of control efforts and minimize introduction and spread of invasive plants as feasible, with consideration for project objectives and location (e.g., install and maintain fuel breaks, disc lines, and other work before non-native plants set seeds)

### **IP-4 Retain Native Plants<sup>15,16</sup>**

When removing vegetation, focus first on removing invasive and highly flammable species, and dead or diseased vegetation. Retain beneficial, low-fire risk, healthy native plant species whenever possible, except where the historic disturbance regime for the vegetation community has not been maintained or the vegetation poses a hazard to the public.

### **GEO-1 Erosion and Soils Loss Stabilization Measures<sup>17</sup>**

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<sup>11</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>12</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>13</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>14</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>15</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019

<sup>16</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>17</sup> Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

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Soils will be stabilized if a vegetation management activity may leave less than 70 percent groundcover or native mulch/organic material.

For areas between 50 percent and 70 percent ground cover left:

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

For areas with less than 50 percent ground cover:

- Any of the above measures
- Stabilize with mulch or equivalent immediately after project activities, to the maximum extent practicable.
- 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 such as 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

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### **GEO-3 Soil Saturation and Rain Event Measures**<sup>18,19,20</sup>

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

Shut down use of off-road heavy equipment, skidding, and truck traffic when soils become saturated (from rain event) and unable to support the machines. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur.

Off-road heavy equipment work will be suspended if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours

Ground disturbing work (e.g., use of heavy equipment, pulling large vegetation) will not occur during rain events (i.e., 0.5 inch of rain within a 48-hour or greater period  $\geq$  1.5 inches in 24 hours) and may resume when precipitation stops and soils are no longer saturated. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials.

Ground disturbing work (e.g., use of heavy equipment, pulling large vegetation) will not occur during rain events (i.e., 0.5 inch of rain within a 48-hour or greater period  $\geq$  1.5 inches in 24 hours) and may resume when precipitation stops and soils are no longer saturated. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials.

For activities that involve ground disturbing work and have not been stabilized, inspect for evidence of erosion after the first rain event (i.e., 0.5 inch of rain within a 48-hour or greater period) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours.

For activities that involve ground disturbing work, inspect project areas for the proper implementation of erosion control, as necessary and determined by the qualified personnel (e.g., RPF), prior to the rainy season. If erosion control measures are not properly implemented, the measures will be remediated prior to the first rainfall event.

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<sup>18</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>19</sup> Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

<sup>20</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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## HAZ-1 Leak Prevention and Spill Cleanup<sup>21,22</sup>

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

- Proper disposal or management of contaminated soils and materials (i.e., clean up materials)
- Daily inspection of vehicles and equipment for leaks and spill containment procedures
- Emergency response and reporting procedures to address hazardous material releases
- Emergency spill supplies and equipment will be available to respond in a timely manner if an incident should occur
- Response materials such as oil-absorbent material, tarps, and storage drums will be available in the plan area at all times during management activities and will be used as needed to contain and control any minor releases
- The absorbent material will be removed promptly and disposed of properly
- Use of secondary containment and spill rags when fueling
- Discourage “topping-off” fuel tanks
- Workers using fuels or other hazardous materials must be knowledgeable of the specific procedures necessary for hazardous materials cleanup and emergency response
- All diesel and gasoline powered equipment will be maintained per manufacturer's specification, and in compliance with all state and federal emission requirements

## HAZ-2 Wildfire Risk Reduction<sup>23,24,25</sup>

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

- Maintain fire suppression equipment (e.g., shovel, extinguisher) in work vehicles and ensure workers are trained in use
- Closely monitor for ignited vegetation from equipment and tool use
- Train workers to properly handle and store flammable materials to minimize potential ignition sources
- Prohibit smoking in vegetated areas

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<sup>21</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>22</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>23</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>24</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018.

<sup>25</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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- Avoid use of spark- and/or heat-generating equipment during high fire danger days (e.g., Red Flag Days and Fire Weather Watch)
- Outfit off-road diesel vehicles and equipment with spark arrestors
- Avoid metal string or blade weed trimmers
- Maintain one fire extinguisher for each chainsaw

### **HAZ-4 Application of Herbicides<sup>26</sup>**

Projects will comply with all herbicide application regulations and ecologically sound integrated pest management principles.

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

### **HAZ-5 Protect Vegetation and Special-Status Species from Herbicides<sup>27</sup>**

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

- Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway.
- Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry.

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<sup>26</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>27</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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- No terrestrial or aquatic herbicides will be applied within Watercourse and Lake Protection Zones (WLPZs) of Class I<sup>28</sup> and II<sup>29</sup> watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ.
- No herbicides will be applied through any method within a 50-foot buffer of federal Endangered Species Act (ESA) or California ESA listed plant species or within 50 feet of dry vernal pools other than painted or sponged on applications to invasive and/or non-native species cut stumps.
- For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by California Department of Pesticide Regulation, if warranted) to prevent overspray.

### **NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors**<sup>30,31</sup>

All projects will comply with applicable local noise ordinances. All powered equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.

- Measures to minimize noise disruption to nearby neighbors and sensitive receptors will be implemented as needed. These measures may include but are not limited to:
  - Using noise control technologies on equipment (e.g., mufflers, ducts, and acoustically attenuating shields)
  - Locating stationary noise sources (e.g., pumps and generators) away from sensitive receptors
  - Closing engine shrouds during equipment operations
  - Shutting down equipment when not in use. Equipment will not be idled unnecessarily
  - Operating heavy equipment during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship)
  - Locating 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

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<sup>28</sup> A Class I watercourse includes any domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area, and/or fish are always or seasonally present onsite, and includes habitat to sustain fish migration and spawning.

<sup>29</sup> A Class II watercourse has fish always or seasonally present offsite within 100 feet downstream, and or aquatic habitat for nonfish aquatic species. Class II watercourses excludes Class III waters that are tributaries to Class I waters.

<sup>30</sup> Adapted from San Francisco Public Utilities Commission (SFPUC), Standard Construction Measures, July 2015.

<sup>31</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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### **NSO-1 Northern Spotted Owl Nesting Season Avoidance<sup>32</sup>**

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<sup>33</sup>**

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 Marin Wildfire 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.

- 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

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<sup>32</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>33</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

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

- 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<sup>34, 35</sup>**

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<sup>36</sup>**

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<sup>37,38,39,40</sup>**

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

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<sup>34</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>35</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>36</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>37</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>38</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>39</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>40</sup> Adapted from Marin County Parks (MCP), Bird Nesting Survey Training Manual, 2017.

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### **NB-2 Nesting Bird Surveys**<sup>41,42,43</sup>

If work that has the potential to impact nesting birds commences between February 1 and July 31 (during the nesting season), a qualified biologist (whose qualifications have been approved by Marin Wildfire 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 days, a follow-up survey will be conducted prior to the restarting of work. Appropriate survey areas will be determined by the qualified biologist depending on the project footprint, type of activity proposed, and suitable habitat for nesting birds. Surveys will be conducted during periods of high bird activity (i.e., 1-3 hours after sunrise and 1-3 hours before sunset). If the qualified biologist determines that visibility is significantly obstructed due to on-site conditions (such as access issues, rain, fog, smoke, or sound disturbance [including high wind]), surveys will be deferred until conditions are suitable for nest detection.

### **NB-3 Nesting Birds: Active Nest Avoidance**<sup>44,45,46,47</sup>

If active nests (i.e., presence of eggs and/or chicks) are observed in areas that could be directly or indirectly disturbed (including noise disturbance), a temporary, species-appropriate no-disturbance buffer zone will be created around the nest sufficient to reasonably expect that breeding would not be disrupted. No work will occur inside the buffer zone.

The size of the buffer zone will be determined by the biologist, by taking into account factors including but not limited to the following:

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<sup>41</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>42</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>43</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>44</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>45</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>46</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>47</sup> A Class II watercourse has fish always or seasonally present offsite within 100 feet downstream, and or aquatic habitat for nonfish aquatic species. Class II watercourses excludes Class III waters that are tributaries to Class I waters

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- Noise and human disturbance levels at the site at the time of the survey and the noise and disturbance expected during the work;
- Distance and amount of vegetation or other screening between the site and the nest; and
- Sensitivity of individual nesting species and behaviors of the nesting birds, taking into account factors such as topography, visibility to source of disturbance, noise/vibration, nesting phase, and other case-by-case specifics.

Buffer sizes may be altered during the course of work at the recommendation of the biologist. Raptor nests are subject to additional protections, including during the “branching” phase, when fledglings begin to fly but do not fully leave the nest. Buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified biologist.

If work must occur within the buffer, proceed to NB-4.

### **NB-4 Nesting Birds - Active Nest Monitoring**<sup>48,49,50,51</sup>

If an avoidance buffer is not achievable, a qualified biologist may monitor the nest(s) during work activities within the recommended nest buffer to document that no take of the nest (nest failure) has occurred related to work activities. If it is determined that work activity is resulting in nest disturbance, work should cease immediately.

### **WILD-1 Temporary Fencing**<sup>52</sup>

If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly recyclable fencing design will be used. The design should consider the following:

- Minimize the chance of wildlife entanglement by minimizing barbed wire, loose or broken wires.
- If feasible, keep electric netting-type fencing electrified at all times or laid down while not in use.
- Charge temporary electric fencing with intermittent pulse energizers.
- Allow wildlife to jump over easily without injury by installing fencing that can flex as non-target animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it, while keeping grazing animals safely within the fence. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass.

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<sup>48</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

<sup>49</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>50</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>51</sup> A Class II watercourse has fish always or seasonally present offsite within 100 feet downstream, and or aquatic habitat for nonfish aquatic species. Class II watercourses excludes Class III waters that are tributaries to Class I waters

<sup>52</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

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### **RB-1 Pework Survey<sup>53,54</sup>**

If vegetation management activities would (1) occur in trees with potential for roosting bat species (e.g., trees with a diameter at breast height of 10 inches or greater), (2) would include removal of trees where a bat could be roosting and (3) 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 maternity roosting bats will be disturbed during work. This survey can be conducted concurrent with other surveys for other sensitive species. Potentially suitable bat roosting habitat 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<sup>55</sup>**

If active maternity roosts or day roosts are found within the project site, or in areas subject to disturbance from work activities, avoidance buffers will be implemented. The buffer size will be determined in consultation with the qualified biologist or RPF.

### **RB-3 Bat Roosting Tree Removal – Seasonal Restrictions<sup>56</sup>**

If it is determined that a colonial maternity roost is potentially present, the roost will be avoided and will not be removed during the breeding season (March 1 through July 31) unless removal is necessary to address an imminent safety hazard.

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

### **RB-4 Bat Roosting Tree Removal – Emergency Removals<sup>57</sup>**

Potential non-colonial roosts that must be removed in order to address a safety hazard, can be removed after consultation with a biologist. Removal will occur on warm days in late morning to afternoon when any bats present are likely to be warm and able to fly. Appropriate methods will be used to minimize the potential of harm to bats during tree removal. Such methods may include using a two-step tree removal process. This method is conducted over two consecutive days, and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on Day 1. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in

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<sup>53</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018.

<sup>54</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>55</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018.

<sup>56</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018.

<sup>57</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018.

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causing bats that emerge nightly to feed, to not return to the roost that night. The remainder of the tree is removed on Day 2.

### **SH-1 Riparian Resources – Project Design<sup>58, 59</sup>**

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<sup>60,61</sup>**

The following measures will be implemented to maintain emergency access:

- At least one week prior to temporary lane or full closure of a public road for vegetation management-related work, the appropriate emergency response agency/agencies will be contacted with jurisdiction to ensure that each agency is notified of the closure and any temporary detours in advance and obtain all required encroachment permits
- In the event of any emergency, roads blocked or obstructed for maintenance activities will be cleared to allow the vehicles to pass.
- During temporary lane or road closures on public roads, flaggers equipped with two-way radios will be utilized where needed to control traffic. During an emergency, flaggers will radio to the crew to cease operations and reopen the public road to emergency vehicles.
- All authorized vehicles at the treatment site will be parked to not block roads when no operator is present to move the vehicle.

### **TR-2 Traffic Control Measures<sup>62</sup>**

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<sup>58</sup> Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

<sup>59</sup> Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

<sup>60</sup> Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019

<sup>61</sup> Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

<sup>62</sup> Adapted from the measures in the East Bay Municipal Utility District (EBMUD) Practices and Procedures Monitoring and Reporting Plan Section 01 35 44 Environmental Requirements, August 2018

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Traffic control measures will be implemented to maintain traffic and pedestrian circulation on streets affected by project activities. The following measures may include:

- All traffic control devices will conform to the latest edition of the MUTCD, and as amended by the latest edition of the MUTCD California supplement.
- Any work that disturbs normal traffic signal operations and ensure proper temporary traffic control (lane shifts, lane closures, detours etc.) will be coordinated with the agency having jurisdiction, at least 72 hours prior to commencing work.
- Flaggers and/or warning signage of work ahead.
- A minimum of twelve (12) foot travel lanes on public roads must be maintained unless otherwise approved.
- Maintaining access to driveways and private roads at all times unless other arrangements have been made.
- Traffic control devices will be removed from view or covered when not in use.
- Sidewalks for pedestrians will remain open if safe for pedestrians. Alternate routes and signing will be provided if pedestrian routes are to be closed.
- Scheduling truck trips during non-peak hours to the extent feasible.

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

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

Sensitive habitats, notably wetted watercourses and wetland areas, would be avoided and any vegetation trimming or thinning would be conducted by hand in riparian habitats and alteration to and deposition of debris would be avoided within the bed, channel, or bank of a waterway (SH-1). As part of the proposed project, a biologist would survey ahead of treatment and flag off sensitive areas for avoidance or specialized treatment. Only herbicides approved for use in aquatic environments, specifically with the active ingredient triclopyr, would be applied by hand in riparian habitats and only during low-flow periods (HAZ-6). Due to the location, scope, and design of the proposed project, the proposed project would not adversely affect riparian habitats as the work would not affect shade or species diversity and could be beneficial if invasive species removal is needed, therefore, exception (a) does not apply.

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

Other roadside vegetation thinning treatments along evacuation routes are occurring in the West Marin Zone and Southern Marin Zone and greater Marin County and would not result in cumulative impacts as defined in CEQA Guidelines Section 15300.2. The West Marin Zone Evacuation Route Core Project was approved in July 2021 to treat vegetation along a total of 24.7 miles of roadways in western Marin County, of which 14.3 miles are included in this project in order to extend the analyzed vegetation treatment area from 10 feet up to 25 feet around existing roadways. Treatment intensity in any one location would not increase as treatment would only be conducted as needed, based on fire professional's determination. Ongoing maintenance of the vegetation along the proposed project roadways would be limited to the types of activities previously described, which would be performed periodically to maintain reduce wildfire intensity, if ignited, and provide safe access for emergency responders. The visual character of the proposed 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 existing character would remain. The design and implementation of this

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proposed project (e.g., NB-1, CUL-1) ensures that significant effects on environmental resources are avoided over successive years of maintenance. The proposed project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

### (c) Significant Effects due to “Unusual Circumstances”:

The proposed vegetation management and future maintenance activities along roadways are considered routine and are prevalent and typical throughout the County and Bay Area region. Sensitive waterways would be avoided. Significant effects on special-status species would not occur (e.g., NB-1, RB-1, NSO-1; refer to analysis below). The proposed project would modify the vegetation, but the existing character would remain, and the aesthetic change would not be substantial. Therefore, there are no unusual circumstances associated with the proposed project or the environment in which it would be implemented, and exception (c) does not apply.

### (d) Scenic Highways:

State Route 1 runs alongside project areas throughout the entirety of the Project, however fuel treatments would not be visible from the eligible scenic highway; therefore, exception (d) does not apply (Caltrans 2024).

### (e) Hazardous Waste Sites:

Per the current government database of hazardous waste sites at the time of this filing. Several closed case sites exist adjacent to the project area, however no open case sites exist in the vicinity of the project alignment (DTSC 2024; SWRCB 2024). No ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

### (f) Historical Resources:

Some hand pulling of invasive plants could occur that could disturb soils. Equipment and vehicles would operate from the road prism, minimizing disturbance. As part of the proposed project, workers would participate in cultural training prior to proposed project implementation (CUL-1). Should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided or only methods allowed by a qualified cultural resource specialist/archaeologist would be implemented (CUL-2). If any resources are discovered during implementation that require monitoring to continue treatment in the area, a qualified archaeological would be present and as appropriate, a tribal monitor would be invited to monitor during ground disturbance (CUL-5). Proposed project activities would not alter any built environment features and would not cause a substantial adverse change in the significance of a known or previously undiscovered historical resource. Therefore, exception (f) does not apply.

## Environmental Assessment

### Aesthetics

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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The visual character along the evacuation roadways differs depending upon the area, but is characterized by primarily low density residential and vegetated areas. Vegetation communities vary but largely consist of coastal vegetation including dense forests, shrublands, grassy lowlands and hills. Equipment and trucks performing the work would be temporarily visible along the evacuation roadways. The vegetation thinning activities would be in one area for a short period of time (a few hours to a day). Motorists on the public roadways would be able to see crews and treatment activities. Viewers in the vicinity of the routes could also include recreationalists traveling to or on nearby Federal and state lands and homeowners.

Minor changes to the vegetation patterns and form would occur from manual and mechanical removal and trimming of small or hazardous trees and shrubs within typically 10 feet of the road edge, upwards of 25 feet. Fire road treatment would involve trimming encroaching and overhanging vegetation to maintain road access. The vegetative material would be chipped and hauled away from the work area, typically, although chips may be applied to the ground in some areas. Viewers in the immediate vicinity may notice changes in the density and type of vegetation along the evacuation routes. These methods of vegetation thinning currently occur in the West Marin and Southern Marin Zones as well as throughout broader Marin County to maintain ingress and egress as well as reduce potential for ignition from along roads. This type of work and vegetation management is typical of the area and a characteristic part of the existing environment. The proposed project would not degrade views from the roads or trails because the visual change would be minimal, is typical in the area, and would only extend up to 25 feet from roadways. The existing vegetation and characteristics of the areas would remain. Visual degradation as seen from State or locally designated scenic roads or vistas, including the Marin County ridge and upland greenbelt areas, would not occur. Significant adverse effects to aesthetics would not occur.

## Agriculture and Forestry Resources

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed vegetation thinning activities would not convert designated farmland to non-agricultural uses. Project activities would primarily involve thinning and removal of small fire-hazardous trees, shrubs, and underbrush along evacuation routes and trimming encroaching and overhanging vegetation along fire roads. The proposed project would not result in the loss of forest land, nor would it convert forestry land to non-forestry use. Adverse effects on agriculture and forestry resources would not occur.

## Air Quality

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Vehicles and equipment for roadside and fire road treatments would emit diesel particulate matter and criteria air pollutants. In a typical day, it is assumed that worker trucks, excavator, bucket truck, chainsaw, string trimmers, pull saws, chipper, and manual and mechanical hand tools would operate for a few hours per crew and up to one off-haul trucks would travel to a

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green waste disposal center a day. No tilling or grading activities that could generate fugitive dust emission would occur.

## Biological Resources

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sequoia Ecological Consulting, Inc. (Sequoia) conducted desktop searches and a field assessment to determine potential for species to occur and presence of Environmentally Sensitive Habitat Areas (ESHAs). Reconnaissance surveys were conducted in April 2024 to document potential sensitive resources within the project site boundary, map the boundaries of identified ESHAs, and map the 100-foot zone of influence of project activities. Sequoia biologists determined the potential for species to occur and ESHA areas based on spatial data, satellite imagery, and the results of the desktop surveys (Calflora 2024; CNDDDB 2024; eBird 2024). Preliminary habitat maps were developed using available data and were verified during field surveys. Of the species identified during the assessment, 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. Figure 3 through Figure 10 present wetlands, riparian areas, and ESHA based on survey and desktop data.

## Special-Status Plants and Sensitive Vegetation Communities

Potential ESHA boundaries were mapped by Sequoia based on desktop review and field verification. Field surveys resulted in 94 total ESHAs identified along roadsides or within 100 feet of roadsides: 57 riparian ESHAs, including two ponds documented as occupied habitat for California red-legged frog (*Rana draytonii*); 22 wetland ESHAs (discussed further below); and 15 terrestrial ESHAs, including one coastal dune habitat, 11 documented occupied habitats for Marin manzanita (*Arctostaphylos virgata*), one documented occupied habitat for osprey (*Pandion haliaetus*), one documented occupied habitat for monarch butterfly, and one rookery.

Potential rare plant habitat was documented in various habitats throughout the project area. Vegetation types identified within the project area include ruderal areas, eucalyptus groves, riparian forests, coastal scrub shrublands, mixed conifer forests (*Pinus radiata* Alliance), California annual and perennial grasslands, riparian shrublands, and oak bay woodlands. No sensitive vegetation communities were encountered within the roadside treatment areas during surveys.

Workers would receive training from a qualified professional prior to beginning the roadside vegetation treatments where sensitive biological resources could occur in the work areas, which would include identification of special-status plant species and avoidance or, as appropriate, training for species-specific protocols for work, such as trimming methods (ET-1). The training for this proposed project would involve identification of all species with a moderate or high potential to occur, including, but not limited to swamp harebell, Marin manzanita, and Mt. Vision ceanothus for avoidance if encountered in the project area. Additionally, prior to treatment, a biologist would conduct a survey and flag sensitive plants and habitats, including ESHA, for either avoidance or modified treatment to ensure no adverse effects occur. The vegetation treatments would leave native species in place (IP-4). Workers would clean equipment and handle vegetation to avoid spreading invasive species and plant pathogens (IP-1, IP-2, IP-3). All

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sensitive plant species, other than Marin manzanita, have a low to no potential to be impacted by proposed project activities as shown in Table 1.

The blooming season for sensitive plants with a moderate to high potential to occur ranges from February through October. Initial treatment is anticipated to begin in October 2024 and roadside treatments may be performed within the blooming season for some sensitive species. Herbicides, if used, would be applied in a targeted manner for stump treatment to prevent resprouting. The proposed project would use Garlon 4 Ultra (i.e., herbicide with the active ingredient triclopyr). Particles or vapors from herbicide drift may impact non-target special-status plant species in the immediate vicinity of the target species. Triclopyr is toxic to non-target plant species, and small quantities of herbicide drift can result in dead vegetation (US EPA 1998; Minnesota Department of Agriculture n.d.). Off-site drift from backpack applications typically has low risk of damage to plants at distances of greater than 25 to 300 feet depending on the herbicide (U.S. Forest Service n.d.). Herbicides would not be applied within a 50-foot buffer of any ESA or California ESA-listed species (HYD-1 and HAZ-5). If off-site drift from herbicide application is proposed that could damage the flowering body or seed dispersal of plant species that may occur in areas with suitable habitat and during the blooming season, surveys would be conducted prior to treatment (ES-1). As noted above, any individuals found during the pre-treatment surveys would be flagged for avoidance or modified methods such as use of an alternative herbicide or different application method (e.g., paint on). In accordance with ES-1, biologists would determine a buffer around sensitive species based on the type of herbicide and application method utilized.

Most experts agree that misapplications and spills of herbicides are the leading cause of impacts on non-target species. Misapplications and spills are caused by failure to follow label instructions and restrictions, and failure of applicators to apply herbicides correctly. Spill prevention and response measures would be implemented that would ensure that herbicides are properly stored on-site and that any accidental releases of hazardous materials would be properly controlled and quickly cleaned up (HAZ-1). Measures would be implemented to minimize herbicide drift including applying herbicides during low-wind weather conditions, using low nozzle pressures, and spraying nozzles within 24 inches of vegetation (HAZ-4). Significant impacts on native vegetation communities and special-status plants species would not occur.

### **Special-Status Wildlife**

Several sensitive wildlife species have a moderate or high potential to occur, including California red-legged frog, northern spotted owl, and several other avian species as shown in Table 1. Workers would be trained to identify and avoid the types of special-status wildlife species with a moderate or high potential to occur in the work areas (ET-1).

In addition to special-status bird species, migratory birds and birds of prey have a potential to nest or forage within the project site and are protected under the Migratory Bird Treaty Act and Sections 3503 and 3503.5 of the California Fish and Game Code. Project activities could occur from February 1 to July 31, during which time appropriate nesting bird and/or maternity roosting bat surveys would be conducted to avoid any effects to nesting birds and maternity roosting bats (per PDIFs NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4). If active nests are observed in or adjacent to treatment areas, an avoidance buffer would be implemented, or a qualified biologist may monitor the nests during work activities if an avoidance buffer is not achievable (NB-3, NB-4).

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Critical habitat for marbled murrelet (*Brachyramphus marmoratus*) occurs within the project area, although no occurrences have been recorded within 3 miles of the project area.

Eight northern spotted owl activity centers are documented within 0.25 miles of the project work areas. The 0.25-mile buffers around the activity centers overlap with the evacuation routes and fire roads in some areas, notably the Inverness area. Six northern spotted owl activity centers fall just outside 0.25 mile from the work areas, four of which are in the Bolinas 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 treatment for ingress and egress and ladder fuel removal. This vegetation would grow back and be retreated as needed. Vegetation treatment would typically occur within 10 feet, and up to 25 feet, from roadways. Fire road treatment would involve trimming encroaching and overhanging vegetation to maintain road access for fire equipment and emergency personnel. Due to the sensitivity to human presence such as vehicle traffic, northern spotted owls are less likely to nest in areas directly adjacent to roadsides. 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.

Two perennial ponds west of Olema Bolinas Road have documented occupation of California red-legged frog habitat. Wetted wetlands and streams that may provide habitat for this species would be avoided by project activities. The project biologist would survey ahead of treatment and identify any high potential upland habitat and workers would be trained to identify the California red-legged frog for avoidance (ET-1). The risk to California red-legged frog would be minimal as off-road ground-based equipment use would not occur. Herbicides would not be applied within a 50-foot buffer of any ESA or California ESA listed species (HYD-5). Training would include identification of sensitive habitats for several special-status species, such as riparian areas, for avoidance (ET-1).

The removal of hazardous accumulated ground and ladder fuels would target fire-hazardous vegetation and accumulative dead biomass along the evacuation route. Healthy, mature trees would not be removed. Given the work would be conducted within generally 50 feet of paved roadways and focused on the removal of dead and downed vegetation and understory thinning, the work would not be considered habitat alteration. Significant impacts on special-status wildlife species would not occur.

### **Wetlands**

Twenty-two freshwater and saltwater wetland ESHAs intersect with or are adjacent to the roadside treatment areas but no project activities would occur in wetlands, which would be flagged for avoidance by a biologist during pre-treatment surveys. Existing infrastructure including culverts would not be altered as part of the proposed project. Due to the type of project and extent of the proposed project activities adjacent to roadsides, wetlands are not anticipated to be encountered. Training would ensure that workers avoid wetlands (ET-1). Significant impacts on wetlands would not occur.

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

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<b>Sensitive Plants</b>					
<i>Abronia umbellata</i> var. <i>breviflora</i>	pink sand verbena	CRPR 1B.1	Coastal dunes and coastal strand. Foredunes and interdunes with sparse cover. Occurs 0 to 33 feet in elevation and blooms June-October.	None; suitable habitat occurs near the project area in Inverness and Pt. Reyes Station but not within Project footprint. One observation adjacent to Pt. Reyes Station in 2019, two observations approximately 2.8 miles west of project area in 2018 and 2000 (Calflora 2024). Two additional occurrences are known within three miles of Inverness (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Agrostis blasdalei</i>	Blasdale's bent grass	CRPR 1B.2	Coastal dunes, coastal bluff scrub, coastal prairie. Sandy or gravelly soil close to rocks; often in nutrient-poor soil with sparse vegetation. Occurs 16 to 1,198 feet in elevation; blooms May-July.	Low; suitable habitat occurs near the project area in Inverness and Pt. Reyes Station. One observation adjacent to Pt. Reyes Station in 2019 (Calflora 2024). Another observation in Inverness in 1990 (Calflora 2024). Eight occurrences within 3 miles of Inverness (CNDDDB 2024).	Low; suitable habitat is unlikely to be encountered within the roadsides and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Allium peninsulare</i> var. <i>franciscanum</i>	Franciscan onion	CRPR 1B.2	Cismontane woodland, valley and foothill grassland. Clay soils; often on serpentine; sometimes on volcanics. Dry hillsides. Occurs 16 to 1,148 feet in elevation and blooms (April) May-June.	None; no known occurrences or observations within approximately 10 miles of project activities.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Alopecurus aequalis</i> var. <i>sonomensis</i>	Sonoma alopecurus	FE, CRPR 1B.1	Marshes and swamps (freshwater), riparian scrub. Occurs 15 to 1,200 feet in elevation and blooms May-July.	None; suitable habitat present near Inverness but not within the project area. Observations noted near Inverness, Pt. Reyes Station, and north of Bolinas (Calflora 2024). Most recent observation is at Abbott's Lagoon Trail, west of Inverness.	None; wetland and riparian areas would be avoided, and species is unlikely to occur.
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	CRPR 1B.2	Broad-leafed upland forest, chaparral, cismontane woodland. Openings in forest or woodland or in chaparral. Occurs 98 to 2,411 feet in elevation and blooms April-July.	Moderate; suitable habitat occurs within project area near Bolinas and Stinson Beach. One observation northeast of Stinson Beach on Mt Tamalpais in 2006 (Calflora 2024). Another observation just north of Stinson Beach in 2022 (Calflora 2024). Ten occurrences within 3	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				miles of Bolinas and Stinson Beach (CNDDDB 2024).	
<i>Amsinckia lunaris</i>	bent-flowered fiddleneck	CRPR 1B.2	Cismontane woodland, valley and foothill grassland, coastal bluff scrub. Occurs 10 to 2,608 feet in elevation and blooms March-June.	Low; suitable habitat within project area near Bolinas and Stinson Beach. One observation in 2019 north of Bolinas Lagoon (Calflora 2024). One occurrence within 3 miles of Bolinas, and there is potential to occur within Stinson Beach (CNDDDB 2024).	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Arctostaphylos montana ssp. montana</i>	Mt. Tamalpais manzanita	CRPR 1B.3	Chaparral, valley and foothill grassland. Serpentine slopes in chaparral and grassland. Occurs 492 to 2,231 feet in elevation and blooms February-April.	Low; suitable habitat found near the project area in Bolinas and Stinson Beach. Observed within project area near Bolinas and Stinson Beach. One observation in 2019 north of Bolinas Lagoon (Calflora 2024). Three occurrences within 3 miles of Bolinas and Stinson Beach (CNDDDB 2024).	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Arctostaphylos virgata</i>	Marin manzanita	CRPR 1B.2	Broad-leafed upland forest, closed-cone coniferous forest, chaparral, North Coast	High; multiple observations and suitable habitat known within project area around	Moderate; likely widespread throughout project area but species would be included in environmental training to

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			coniferous forest. Occurs on sandstone or granitic substrate 3 to 2,625 feet in elevation. Blooms January-March.	Inverness, Pt. Reyes Station, and Bolinas. Observations north of Bolinas Lagoon as recently as 2019; observation in 2021 approximately one mile west of Inverness (Calflora 2024). 20 occurrences within three miles of project (CNDDDB 2024). Over 100 individuals observed during reconnaissance surveys in Inverness.	ensure avoidance (PDIF ET-1). Additionally, pre-treatment surveys and flagging would be completed prior to project activities.
<i>Arenaria paludicola</i>	marsh sandwort	FE, SE, CRPR 1B.1	Marshland and wetlands. Occurs 10 to 560 feet in elevation and blooms May-August	None; nearest known observations are near Rodeo Beach (Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	coastal marsh milk-vetch	CRPR 1B.2	Coastal dunes, marshes and swamps, coastal scrub. Mesic sites in dunes or along streams or coastal salt marshes. Occurs 0 to 509 feet in elevation and blooms April-October.	None; species is not likely to occur along the roadside. One occurrence within 3 miles of Muir Beach (CNDDDB 2024). Observed within the Bolinas Lagoon Preserve in 2018, precise coordinates not known.	None; wetland and riparian areas would be avoided.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Blennosperma nanum var. robustum</i>	Point Reyes blennosperma	SR, CRPR 1B.2	Northern coastal scrub, coastal prairie, wetland-riparian. Occurs usually in wetlands, occasionally in non-wetlands from 35 to 475 feet in elevation. Blooms February-April.	Low; suitable habitat found near the project area in Inverness. One occurrence within three miles of project (CNDDDB 2024). Observed in 2020 adjacent to the Historic Life-Saving Cemetery appx. 2.75 miles from project site near Inverness (Calflora 2024).	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Calamagrostis crassiglumis</i>	Thurber's reed grass	CRPR 2B.1	Coastal scrub, marshes and swamps. Usually in marshy swales surrounded by grassland or coastal scrub. Occurs between 16 to 164 feet in elevation. Blooms May-August.	None; no known occurrences or observations within the project area. Closest observation in 1999 at Drakes Estero, appx. 3.5 miles west of Inverness (Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Calystegia purpurata ssp. saxicola</i>	coastal bluff morning-glory	CRPR 1B.2	Coastal dunes, coastal scrub, coastal bluff scrub, North Coast coniferous forest. Occurs 33 to 344 feet in elevation and blooms (March) April-September.	Low; suitable habitat is present in portions of the project area near Inverness, Stinson Beach and Muir Beach. One observation in 2018 appx. 0.9 mile from project southwest of Inverness (CNDDDB 2024).	Low; suitable habitat would generally be avoided, species unlikely to be encountered, and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Cardamine angulata</i>	seaside bittercress	CRPR 2B.2	North Coast coniferous forest, lower montane coniferous forest. Occurs in wet areas, streambanks from 295 to 509 feet in elevation. Blooms (January) March-July.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Carex leptalea</i>	bristle-stalked sedge	CRPR 2B.2	Bogs and fens, meadows and seeps, marshes and swamps. Mostly known from bogs and wet meadows from 10 to 4,577 feet in elevation. Blooms March-July.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Carex lyngbyei</i>	Lyngbye's sedge	CRPR 2B.2	Marshes and swamps (brackish or freshwater). Occurs 0 to 656 feet in elevation and blooms April-August.	None; suitable habitat exists near Inverness and Bolinas but not within the project area. Two occurrences within 3 miles of project (CNDDDB 2024). One observation less than one mile east of Inverness near Millerton in 2013 (Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Castilleja affinis var. neglecta</i>	Tiburon paintbrush	CRPR 1B.2	Valley and foothill grassland. Rocky serpentine sites. Occurs 394 to 1,312 feet	None; no known occurrences or observations within 3	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Castilleja ambigua var. humboldtensis</i>	Humboldt Bay owl's-clover	CRPR 1B.2	in elevation and blooms April-June. Salt marsh, marshes and swamps. In coastal saltmarsh with <i>Spartina</i> , <i>Distichlis</i> , <i>Salicornia</i> , <i>Jaumea</i> from 0 to 66 feet in elevation. Blooms April-August.	miles of any project area (CNDDDB 2024). Low; species occurs near Inverness project area east of Kent Lake. Three occurrences within 3 miles of Inverness (CNDDDB 2024). One observation in 1996 within project bounds in Inverness (Calflora 2024).	None; wetland and riparian areas would be avoided.
<i>Castilleja leschkeana</i>	Point Reyes paintbrush	CRPR 1A	Valley and foothill grassland. Occurs in rocky serpentine sites from 394 to 1,312 feet in elevation. Blooms April-June.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024). Taxon is presumed extinct (Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Ceanothus decornutus</i>	Nicasio ceanothus	CRPR 1B.2	Maritime chaparral; serpentinite, rocky, sometimes clay. Occurs 771 to 951 feet in elevation and blooms March-May.	Low; three observations in 2014, 2018, and 2022, respectively, approximately 1.6 miles northeast of Inverness area on Sir Francis Drake Blvd. near Tocaloma.	Low; suitable habitat would be avoided, species is unlikely to be encountered, and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Ceanothus gloriosus var. porrectus</i>	Mt. Vision ceanothus	CRPR 1B.3	Closed-cone coniferous forest, coastal prairie, coastal scrub, valley and foothill grassland. Low	High; multiple observations within project area (Recon Surveys). Suitable habitat is found within Inverness	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			shrub in a variety of habitats on Pt. Reyes; sandy soils from 33 to 1,099 feet in elevation. Blooms February-May.	and Seahaven (Calflora 2024; CNDDDB 2024). Ten occurrences within 3 miles of Inverness (CNDDDB 2024).	environmental training to ensure avoidance (PDIF ET-1).
<i>Ceanothus masonii</i>	Mason's ceanothus	SR, CRPR 1B.2	Chaparral. Serpentine ridges or slopes in chaparral or transition zone. Occurs 591 to 1,509 feet in elevation and blooms March-April.	Low, Moderate in Bolinas area; suitable habitat found near the project area in Bolinas. Ten occurrences within 3 miles of Bolinas and Stinson beach (Calflora 2024). More than 7 observations along Bolinas Ridge Trail approximately 1.5 miles northeast of project activities at Bolinas/Stinson Beach (Calflora 2024).	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance in the Bolinas area (PDIF ET-1).
<i>Chloropyron maritimum ssp. palustre</i>	Point Reyes salty bird's-beak	CRPR 1B.2	Coastal salt marsh. Usually in coastal salt marsh with Salicornia, Distichlis, Jaumea, Spartina, etc. Occurs 0 to 377 feet in elevation and blooms June-October.	Low; multiple observations and suitable habitat near Bolinas, Stinson Beach, and the area around Pt. Reyes Station to Inverness (Calflora 2024).	None; marsh habitats would be avoided and typically are not roadside.
<i>Chorizanthe cuspidata var. cuspidata</i>	San Francisco Bay spineflower	CRPR 1B.2	Broad-leafed upland forest, chaparral, meadows and seeps.	None; no known occurrences or observations within 3	None; species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			Serpentine seeps and streams in chaparral and woodland. Occurs 591 to 2,001 feet in elevation and blooms May-August.	miles of any project area (CNDDDB 2024).	
<i>Chorizanthe cuspidata var. villosa</i>	woolly-headed spineflower	CRPR 1B.2	Coastal bluff scrub, coastal scrub. Occurs 33 to 328 feet in elevation and blooms June-August.	Low; three occurrences within 3 miles of Inverness (CNDDDB 2024). Species occurs to the west of Inverness along the Pacific Ocean. Suitable habitat is present in the Inverness area.	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.
<i>Chorizanthe robusta var. robusta</i>	robust spineflower	FE, CRPR 1B.1	Cismontane woodland, coastal dunes, coastal scrub, chaparral. Sandy terraces and bluffs or in loose sand. Occurs 30 to 804 feet in elevation and blooms April-September.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Chorizanthe valida</i>	Sonoma spineflower	FE, SE, CRPR 1B.1	Coastal prairie and sandy soil. Occurs 16 to 164 feet in elevation and blooms June-August.	Low; three occurrences within 3 miles of Inverness (CNDDDB 2024). One observation in 2018 east of Inverness. Occurs in "Drakes Bay" quad. (Calflora 2024). Species occurs west of project near Inverness, but highly	None; species is unlikely to be encountered as work would not occur in suitable habitat.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				unlikely to occur in the disturbed areas adjacent to roadways as this species requires sandy habitat.	
<i>Cicuta maculata var. bolanderi</i>	Bolander's water-hemlock	CRPR 2B.1	Coastal bluff scrub. Highly exposed rocky bluffs with a near-vertical slope. Occurs 0 to 328 feet in elevation and blooms April-May.	Low; known occurrences and suitable habitat potentially present near Inverness area. Four occurrences within 3 miles of Inverness (CNDDDB 2024).	Low; suitable habitat is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Cirsium andrewsii</i>	Franciscan thistle	CRPR 1B.2	Occurs in coastal dunes from 33 to 98 feet in elevation. Blooms April-June.	Low; seven occurrences within 3 miles of Inverness (CNDDDB 2024). Suitable habitat and observations are southwest of Inverness.	None; coastal dune areas would be avoided.
<i>Cirsium hydrophilum var. vaseyi</i>	Mt. Tamalpais thistle	CRPR 1B.2	Broad-leafed upland forest, chaparral, meadows and seeps. Serpentine seeps and streams in chaparral and woodland. Occurs 591 to 2,001 feet in elevation and blooms May-August	Low; suitable habitat present in roadside ditches/drainages and serpentine soils between Stinson and Muir Beach area; four occurrences within 3 miles of Bolinas and Stinson Beach, notably a fire road in the project area (CNDDDB 2024). One observation in 2017 in Mt Tamalpais State Park approximately	Low; suitable habitat would likely be avoided and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Clarkia concinna ssp. raichei</i>	Raiche's red ribbons	CRPR 1B.1	Coastal bluff scrub. Highly exposed rocky bluffs with a near-vertical slope. Occurs 0 to 328 feet in elevation. Blooms April-May.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Collinsia corymbosa</i>	round-headed collinsia	CRPR 1B.2	Coastal dunes from 33 to 98 feet in elevation. Blooms April-June.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Delphinium bakeri</i>	Baker's larkspur	FE, SE, CRPR 1B.1	Broad-leafed upland forest, coastal scrub, valley and foothill grassland. Only sites occur on NW-facing slope, on decomposed shale. Historically known from grassy areas along fence lines too. Occurs 344 to 673 feet in elevation. Blooms March-May.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Delphinium luteum</i>	yellow larkspur	FE, SR, CRPR 1B.1	Chaparral, coastal prairie, coastal scrub, and north-facing rocky slopes from 0 to 328	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Dermatocarpon meiophyllizum</i>	silverskin lichen	CRPR 2B.3	feet in elevation. Blooms March-May.  Found on rocks along streams and lakes.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024; Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Dirca occidentalis</i>	western leatherwood	CRPR 1B.2	Broad-leaved upland forest, chaparral, closed-cone coniferous forest, cismontane woodland, North Coast coniferous forest, riparian forest, riparian woodland. On brushy slopes, mesic sites; mostly in mixed evergreen and foothill woodland communities. Occurs 82 to 1,394 feet in elevation. Blooms January-March (April).	Moderate; suitable habitat found near the project area in Inverness and Bolinas notably, as well as to a lesser degree in Stinson Beach. Four occurrences within 3 miles of project (CNDDDB 2024). One observation in 2014 approximately 1.5 miles east of Bolinas/Stinson Beach (Calflora 2024)	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Eastwoodiella californica</i>	swamp harebell	CRPR 1B.2	Bogs and fens, closed-cone coniferous forest, coastal prairie, marshes and swamps (freshwater), meadows and seeps, North Coast coniferous forest.	Moderate; multiple observations and suitable habitat known within project area around Inverness and Seahaven (Calflora 2024). Thirteen occurrences within 3	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			Occurs between 5 to 1,330 feet in elevation. Blooms June-October.	miles of Inverness (CNDDDB 2024)	
<i>Entosthodon kochii</i>	Koch's cord moss	CRPR 1B.3	Cismontane woodland, grows on soil on riverbanks from 607 to 1,198 feet in elevation.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024, Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Erigeron biolettii</i>	streamside daisy	CRPR 3	Broad-leafed upland forest, cismontane woodland, and North Coast coniferous forest from 100 to 3,610 feet in elevation. Blooms June-October.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024, Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Erigeron supplex</i>	supple daisy	CRPR 1B.2	Coastal bluff scrub, coastal prairie. Usually in grassy sites from 16 to 607 feet in elevation. Blooms May-July.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024, Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Eriogonum luteolum var. caninum</i>	Tiburon buckwheat	CRPR 1B.2	Chaparral, valley and foothill grassland, cismontane woodland, coastal prairie. Serpentine soils; sandy to gravelly sites from 0 to 2,297 feet in	Low; known occurrences and suitable habitat are found northeast of the Bolinas and Stinson Beach areas outside of project areas. Seven occurrences within 3	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Erysimum concinnum</i>	bluff wallflower	CRPR 1B.2	elevation. Blooms May-September. Coastal dunes, coastal bluff scrub, coastal prairie. A coastal generalist within coastal habitat types from 10 to 197 feet in elevation. Blooms February-July.	miles of Stinson Beach (CNDDDB 2024). Low; suitable habitat found near the project area in Inverness. Three occurrences within 3 miles of Inverness (CNDDDB 2024). One observation northeast of Pt. Reyes Station in 1964 (Calflora 2024).	Low; suitable habitat would generally be avoided, and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Fissidens pauperculus</i>	minute pocket moss	CRPR 1B.2	North Coast coniferous forest; grows on damp soil in dry streambeds and on stream banks from 33 to 3,360 feet in elevation.	Low; suitable habitat found near the project area in Inverness and Muir Beach. One occurrence within 3 miles of Muir Beach (CNDDDB 2024). One observation in 2017 less than 1 mile east of Stinson Beach.	None; wetland and riparian areas would be avoided.
<i>Fritillaria lanceolata</i> var. <i>tristulis</i>	Marin checker lily	CRPR 1B.1	Coastal bluff scrub, coastal scrub, coastal prairie. Occurrences reported from canyons and riparian areas as well as rock outcrops; often on serpentine soils from 49 to 492 feet in elevation. Blooms February-May.	Moderate; multiple observations and suitable habitat known to occur in Inverness area (CNDDDB 2024, Calflora 2024). Eleven occurrences within 3 miles of project (CNDDDB 2024).	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Fritillaria liliacea</i>	fragrant fritillary	CRPR 1B.2	Coastal scrub, valley and foothill grassland, coastal prairie, cismontane woodland. Often on serpentine; various soils reported though usually on clay, in grassland from 10 to 1,312 feet in elevation. Blooms February-April.	Moderate, High in Inverness area; species is known to occur in areas adjacent to project area near Inverness (CNDDDB 2024, Calflora 2024). Four occurrences within 3 miles of Inverness (CNDDDB 2024)	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Gilia capitata ssp. chamissonis</i>	blue coast gilia	CRPR 1B.1	Coastal dunes and coastal scrub from 10 to 656 feet in elevation. Blooms April-July.	Moderate; suitable habitat found near the project area in Stinson Beach. Two occurrences within 3 miles of Inverness (CNDDDB 2024). Observations as recent as 2023 to the west of project areas on coastal dunes above Drakes Bay. Suspected but unconfirmed blue coast gilia observed in Stinson Beach (Recon Surveys)	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Gilia capitata ssp. tomentosa</i>	woolly-headed gilia	CRPR 1B.1	Coastal bluff scrub, valley and foothill grassland. Rocky outcrops on the coast, serpentine from 66 to 410 feet in elevation. Blooms May-July.	Not expected to occur. No known occurrences or observations within 3 miles of Inverness (CNDDDB 2024, Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Gilia millefoliata</i>	dark-eyed gilia	CRPR 1B.2	Coastal dunes from 3 to 197 feet in elevation. Blooms April-July.	Low; two occurrences within 3 miles of Inverness and Bolinas (CNDDDB 2024). Observed in 2022 west of Inverness in the coastal dunes above Drakes Bay.	None; coastal dune areas would be avoided.
<i>Grindelia hirsutula var. maritima</i>	San Francisco gumplant	CRPR 3.2	Northern coastal scrub, coastal sage scrub, valley grassland, wetland-riparian from 50 to 1,310 feet in elevation. Blooms June-September.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Hemizonia congesta ssp. congesta</i>	congested-headed hayfield tarplant	CRPR 1B.2	Valley and foothill grassland. Grassy valleys and hills, often in fallow fields; sometimes along roadsides. Occurs 66 to 2,133 feet in elevation. Blooms April-November.	Low; suitable habitat is present in the project area; two occurrences within 3 miles of Inverness and Bolinas (CNDDDB 2024). One observation near Pt. Reyes Station in 2011 (Calflora 2024).	Low; species is unlikely to be encountered due to limited presence and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Hesperevax sparsiflora var. brevifolia</i>	short-leaved evax	CRPR 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie. Sandy bluffs and flats from 0 to 705 feet in elevation. Blooms March-June.	Low; suitable habitat is not present in the project area, two occurrences within 3 miles of Inverness (CNDDDB 2024). Known to occur west of Pt. Reyes Station in Pt. Reyes	Low; suitable habitat is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				National Seashore (Calflora 2024).	
<i>Hesperolinon congestum</i>	Marin western flax	FT, ST, CRPR 1B.1	In serpentine barrens and in serpentine valley and foothill grassland and chaparral. Occurs from 197 to 1,214 feet in elevation. Blooms April-July.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Heteranthera dubia</i>	water star-grass	CRPR 2B.2	Marshes and swamps. Alkaline, still or slow-moving water. Requires a pH of 7 or higher, usually in slightly eutrophic waters. Occurs at 49 to 4,954 feet in elevation. Blooms July-October.	Low; one occurrence within 3 miles of Inverness (CNDDDB 2024). One observation within the Inverness quad in 2019 (Calflora 2024). Suitable habitat was observed during reconnaissance surveys in Inverness.	None; suitable habitat, including wetland and riparian areas would be avoided.
<i>Holocarpha macradenia</i>	Santa Cruz tarplant	FT, SE, CRPR 1B.1	Coastal prairie, coastal scrub, valley and foothill grassland. Light, sandy soil or sandy clay; often with nonnatives. Occurs 33 to 722 feet in elevation. Blooms June-October.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Horkelia cuneata var. sericea</i>	Kellogg's horkelia	CRPR 1B.1	Closed-cone coniferous forest, coastal scrub, coastal	None; no known occurrences or observations within 3	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			dunes, chaparral, old dunes, coastal sandhills. Occurs at 16 to 705 feet in elevation. Blooms April-September.	miles of any project area (CNDDDB 2024). Suitable habitat found near the project area in Inverness.	
<i>Horkelia marinensis</i>	Point Reyes horkelia	CRPR 1B.2	Coastal dunes, coastal prairie, coastal scrub. Sandy flats and dunes near coast; in grassland or scrub plant communities from 7 to 2,543 feet in elevation. Blooms May-September.	Low; suitable habitat found near the project area in Muir Beach. Four occurrences within 3 miles of Muir Beach (CNDDDB 2024). One observation in 1972 at Muir Beach Overlook (Calflora 2024).	None; coastal dune areas would be avoided.
<i>Horkelia tenuiloba</i>	thin-lobed horkelia	CRPR 1B.2	Broad-leafed upland forest, chaparral, valley and foothill grassland, sandy soils and mesic openings. Occurs 164 to 1,640 feet in elevation. Blooms May-July (August).	Low; suitable habitat found near the project area in Bolinas. Two occurrences within 3 miles of Bolinas (CNDDDB 2024). One observation in 2023 approximately 3 miles east of Stinson Beach.	Low; species is unlikely to be encountered due to limited presence and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Hypogymnia schizidiata</i>	island tube lichen	CRPR 1B.3	Chaparral, closed-cone coniferous forest. On bark and wood of hardwoods and conifers from 1,181 to 1,329 feet in elevation.	None; project area is outside of known elevation range and no known observations in any project area.	None; species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Kopsiopsis hookeri</i>	small groundcone	CRPR 2B.3	North Coast coniferous forest. Open woods, shrubby places, generally on Gaultheria shallon. Occurs 394 to 4,708 feet in elevation. Blooms April-August.	Low; suitable habitat found near the project area in Stinson Beach. One occurrence within 3 miles of project near Stinson Beach (CNDDDB 2024).	Low; suitable habitat is unlikely to be encountered within the roadsides and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Lasthenia californica ssp. bakeri</i>	Baker's goldfields	CRPR 1B.2	Closed-cone coniferous forest, coastal scrub, meadows and seeps, marshes and swamps from 197 to 1,706 feet in elevation. Blooms April-October.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; most habitat types would be avoided, and species is unlikely to occur.
<i>Lasthenia californica ssp. macrantha</i>	perennial goldfields	CRPR 1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. Occurs 16 to 607 feet in elevation. Blooms January-November.	Low; two occurrences within 3 miles of Inverness (CNDDDB 2024). Suitable habitat near project area in Inverness.	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Layia carnosa</i>	beach layia	FE, SE, CRPR 1B.1	Coastal dunes, coastal scrub. On sparsely vegetated, semi-stabilized dunes, usually behind foredunes from 0 to 98 feet in elevation. Blooms March-July.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Leptosiphon rosaceus</i>	rose leptosiphon	CRPR 1B.1	Open grassy slopes, coastal bluff. Blooms April to July.	Low; suitable habitat found near the project area in Inverness. Two occurrences within 3 miles of project (CNDDDB 2024). One observation in 2018 southwest of Inverness.	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Lessingia hololeuca</i>	woolly-headed lessingia	CRPR 3	Chaparral, valley and foothill grassland. Blooms June to October.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Lessingia micradenia</i> var. <i>micradenia</i>	Tamalpais lessingia	CRPR 1B.2	Chaparral, valley and foothill grassland. Usually on serpentine, in serpentine grassland or serpentine chaparral. Often on roadsides. Occurs 197 to 1,001 feet in elevation. Blooms (June), July-October.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Lilaeopsis masonii</i>	Mason's lilaeopsis	SR, CRPR 1B.1	Freshwater and brackish marshes, riparian scrub. Tidal zones, in muddy or silty soil formed through river deposition or riverbank erosion from 0 to 33 feet in elevation.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			Blooms April- November.		
<i>Lilium maritimum</i>	coast lily	CRPR 1B.1	Closed-cone coniferous forest, coastal prairie, coastal scrub, broad-leafed upland forest, North Coast coniferous forest, marshes and swamps. Historically in sandy soil, often on raised hummocks or bogs; today mostly in roadside ditches. Occurs at 13 to 1,558 feet in elevation. Blooms May-August.	Low; one occurrence within 3 miles of Inverness (CNDDDB 2024). Suitable habitat exists south of project area near Inverness	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Limnanthes douglasii ssp. sulphurea</i>	Point Reyes meadowfoam	SE, CRPR 1B.2	Marshes and swamps (freshwater), vernal pools, and seeps. Vernal wet depressions in open rolling, coastal prairies and meadows; typically, in dark clay soil from 33 to 410 feet in elevation. Blooms March-May.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Lupinus tidestromii</i>	Tidestrom's lupine	FE, SE, CRPR 1B.1	Coastal dunes. Partially stabilized dunes, immediately near the	None; no known occurrences or observations within 3	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			ocean from 13 to 82 feet in elevation. Blooms April-June.	miles of any project area (CNDDDB 2024). Suitable habitat found near the project areas in Inverness and Bolinas.	
<i>Microseris paludosa</i>	marsh microseris	CRPR 1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland from 16 to 984 feet in elevation. Blooms April-June (July).	Low; one occurrence within 3 miles of Inverness and Bolinas (CNDDDB 2024). Suitable habitat exists near the project areas in Inverness and Bolinas.	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Monardella sinuata ssp. nigrescens</i>	northern curly-leaved monardella	CRPR 1B.2	Coastal dunes, coastal scrub, chaparral, lower montane coniferous forest. Sandy soils. Occurs from 0 to 984 feet in elevation. Blooms (April) May-July (August/September).	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Navarretia rosulata</i>	Marin County navarretia	CRPR 1B.2	Closed-cone coniferous forest, chaparral. Dry, open rocky places; can occur on serpentine. Occurs 656 to 2,083 feet in elevation. Blooms May-July.	Low; suitable habitat found near the project area in Inverness and Bolinas. Six occurrences within 3 miles of Bolinas (CNDDDB 2024). One observation in 2023 appx. 1.5 miles from project	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Pentachaeta bellidiflora</i>	white-rayed pentachaeta	FE, SE, CRPR 1B.1	Valley and foothill grassland, cismontane woodland. Open dry rocky slopes and grassy areas, often on soils derived from serpentine bedrock. 115 to 2,001 feet in elevation. Blooms March-May.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).  activities northeast of Stinson Beach.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Phacelia insularis var. continentis</i>	North Coast phacelia	CRPR 1B.2	Coastal bluff scrub, coastal dunes. Open maritime bluffs, sandy soil, sometimes rocky habitats. 0 to 509 feet in elevation. Blooms March-May.	Low; one occurrence within 3 miles of Inverness (CNDDDB 2024). Suitable habitat exists near project area in Inverness.	None; work would not occur within suitable habitat. Can be identified and avoided with training (PDIF ET-1).
<i>Piperia elegans ssp. decurtata</i>	Point Reyes rein orchid	CRPR 1B.1	Coastal bluff scrub, coastal prairie from 50 to 605 feet in elevation. Blooms July-October.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Pleuropogon hooverianus</i>	North Coast semaphore grass	CRPR 1B.1	Broad-leafed upland forest, meadows and seeps, North Coast coniferous forest. Wet grassy, usually shady areas, sometimes	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024). Suitable	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			freshwater marsh; associated with forest environments. Occurs at 148 to 3,806 feet in elevation. Blooms April-June.	habitat found near the project area in Inverness.	
<i>Polygonum marinense</i>	Marin knotweed	CRPR 3.1	Marshes and swamps (brackish, coastal salt) from 0 to 35 feet in elevation. Blooms (April) May-August (October).	Low; suitable habitat found near the project area in Inverness and Bolinas. Three occurrences within 3 miles of Inverness and Bolinas (CNDDDB 2024). One observation in 2018 in Bolinas Lagoon Preserve (Calflora 2024).	None; wetland and riparian areas would be avoided.
<i>Quercus parvula var. tamalpaisensis</i>	Tamalpais oak	CRPR 1B.3	Lower montane coniferous forest from 328 to 2,461 feet in elevation. Blooms March-April.	Low; suitable habitat found near the project area in Bolinas. Thirteen occurrences within 3 miles of Bolinas (CNDDDB 2024). Species observed in 2023 northeast of Stinson beach (Calflora 2024).	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Rhynchospora californica</i>	California beaked-rush	CRPR 1B.1	Bogs and fens, marshes and swamps, lower montane coniferous forest, meadows and seeps. Freshwater seeps and open marshy areas	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			from 148 to 3,314 feet in elevation. Blooms May-July.		
<i>Sagittaria sanfordii</i>	Sanford's arrowhead	CRPR 1B.2	Marshes and swamps. In standing or slow-moving freshwater ponds, marshes, and ditches. Occurs 0 to 2,133 feet in elevation. Blooms May-October (November).	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Sidalcea calycosa ssp. rhizomata</i>	Point Reyes checkerbloom	CRPR 1B.2	Marshes and swamps. Freshwater marshes near the coast. Occurs at 16 to 312 feet in elevation. Blooms April-September.	Low; suitable habitat found near the project area in Inverness, Bolinas, and Muir Beach. Seven occurrences within 3 miles of project (CNDDDB 2024). One observation in 2008 northwest of Seahaven.	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Sidalcea hickmanii ssp. viridis</i>	Marin checkerbloom	CRPR 1B.1	Chaparral. Serpentine or volcanic soils; sometimes appears after burns. Occurs 164 to 1,411 feet in elevation. Blooms May-June.	None; no known occurrences or observations within 3 miles of any project area (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Sidalcea malviflora ssp. purpurea</i>	purple-stemmed checkerbloom	CRPR 1B.2	Broad-leafed upland forest, coastal prairie. 49 to 279 feet in	None; no known occurrences or observations within 3	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Silene scouleri ssp. scouleri</i>	Scouler's catchfly	CRPR 2B.2	elevation. Blooms May-June. Coastal bluff scrub, coastal prairie, valley and foothill grassland. Occurs 0 to 1,968 feet in elevation. Blooms (March-May) June-August (September).	miles of any project area (CNDDDB 2024). Low; suitable habitat found near the project area in Inverness. One occurrence within 3 miles of Inverness (CNDDDB 2024). Observation west of Pt. Reyes Station in 1982 (Calflora 2024).	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Stebbinsoseris decipiens</i>	Santa Cruz microseris	CRPR 1B.2	Broad-leafed upland forest, closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, valley and foothill grassland. Open areas in loose or disturbed soil, usually derived from sandstone, shale or serpentine, on seaward slopes. Occurs 33 to 1,640 feet in elevation. Blooms April-May.	Moderate; suitable habitat found near the project area in Inverness. Three occurrences within 3 miles of Stinson Beach (CNDDDB 2024). One observation in 2004 at Steep Ravine trail just south of Stinson Beach along State Route 1 (Calflora 2024).	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Streptanthus anomalus</i>	Mount Burdell jewelflower	CRPR 1B.1	Cismontane woodland (openings). Occurs 165 to 490 feet in elevation. Blooms in May-July.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024). project	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Streptanthus batrachopus</i>	Tamalpais jewelflower	CRPR 1B.3	Closed-cone coniferous forest, chaparral, and talus serpentine outcrops from 1,099 to 2,198 feet in elevation. Blooms April-July.	footprint is outside of species known range.  Low, Moderate in Stinson Beach; suitable habitat found near the project area in Stinson Beach. Four occurrences within three miles of Stinson Beach (CNDDDB 2024). One observation in 2023 along Simmons trail less than 1 mile from project activities along Willow Camp Fire Road (Calflora 2024).	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Streptanthus glandulosus ssp. pulchellus</i>	Mt. Tamalpais bristly jewelflower	CRPR 1B.2	Chaparral, valley and foothill grassland. Occurs on serpentine slopes from 492 to 2,625 feet in elevation. Blooms May-July (August).	Moderate, High in Muir Beach; suitable habitat found near the project area in Stinson Beach. Three occurrences within three miles of project (CNDDDB 2024). Occurs northeast of Stinson Beach.	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Thamnomia vermicularis</i>	whiteworm lichen	CRPR 2B.1	Chaparral, valley and foothill grassland. On rocks derived from Wilson Ranch formation sandstone.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024). No suitable habitat within project area.	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Trifolium amoenum</i>	two-fork clover	FE, CRPR 1B.1	Valley and foothill grassland, coastal bluff scrub. Sometimes on serpentine soil, open sunny sites, swales. Most recently cited on roadside and eroding cliff face. Occurs at 16 to 1,017 feet in elevation. Blooms April-July.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024). No suitable habitat within project area.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Trifolium polyodon</i>	Pacific Grove clover	SR, CRPR 1B.1	Closed-cone coniferous forest, meadows and seeps, coastal prairie, valley and foothill grassland. Along small springs and seeps in grassy openings from 16 to 394 feet in elevation. Blooms April-June (July).	Low; suitable habitat found near the project area in Inverness. One occurrence within three miles of project (CNDDDB 2024).	Low; species is unlikely to be encountered and pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance
<i>Triphysaria floribunda</i>	San Francisco owl's-clover	CRPR 1B.2	Coastal prairie, coastal scrub, valley and foothill grassland. On serpentine and non-serpentine substrate (such as at Pt. Reyes). Occurs from 3 to 492 feet in elevation. Blooms April-June.	Moderate, High in Inverness; suitable habitat found near the project area in Inverness. Seven occurrences within 3 miles of Inverness (CNDDDB 2024). Found west of Inverness (Calflora 2024).	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance and species would be included in environmental training to ensure avoidance (PDIF ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Triquetrella californica</i>	coastal triquetrella	CRPR 1B.2	Coastal bluff scrub, coastal scrub. Grows within 30m from the coast in coastal scrub, grasslands and in open gravels on roadsides, hillsides, rocky slopes, and fields. On gravel or thin soil over outcrops. Occurs 33 to 328 feet in elevation.	None; No known occurrences or observations within 3 miles of any project area (CNDDDB 2024). Potentially suitable habitat exists on coastal roadsides.	None; species is unlikely to occur.

### Sensitive Wildlife

#### Birds

<i>Accipiter atricapillus</i>	American goshawk	SSC	Mature woods, particularly coniferous, but also deciduous or mixed coniferous-deciduous; mostly near edges of forest. Both lowlands and mountainous areas, from sea level up to mountainous subalpine woods at 3,000 m	Low; no recent occurrences of the species in any project area (eBird 2024, CNDDDB 2024). Potential breeding and foraging habitat present in coniferous forest in Inverness.	None; work would not occur in suitable habitat and species in unlikely to occur.
<i>Agelaius tricolor</i>	tri-colored blackbird	ST, SSC	Freshwater marsh, marsh and swamp, wetland. Highly colonial species, most numerous in Central Valley and vicinity.	None; no known occurrences or observations within 3 miles of project area (CNDDDB, 2024). No suitable breeding or	None; work would not occur in suitable habitat and species in unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			Requires open water, protected nesting substrate, and foraging area with insect prey within a few miles of the colony.	foraging habitat within project area.	
<i>Aquila chrysaetos</i>	golden eagle	FP	Rolling foothills, mountain areas, sage juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of the range; also, large trees in open areas. Nests primarily in open grasslands and oak savannah in California.	None; no known occurrences or observations within 3 miles of project area (CNDDDB, 2024). Breeding and foraging habitat does not exist within the project area.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Asio flammeus</i>	short-eared owl	SSC	Grasslands, marshes, scrub habitat. Nests on the ground in grasslands or shrublands.	Moderate; suitable habitat found near the project area in Inverness and Bolinas. Frequently and recently observed throughout the project area (eBird, 2024).	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Asio otus</i>	long-eared owl	SSC	Dense woodlands and coniferous forests.	Low; no known occurrences or	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				observations within 3 miles of project area (CNDDDB 2024). Some potentially suitable habitat near Bolinas and Inverness. This enigmatic species is difficult to detect in California.	2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance.
<i>Athene cunicularia</i>	burrowing owl	SSC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Low; one occurrence within 3 miles of Stinson Beach (CNDDDB 2024). Marginal habitat exists in the grasslands along State Route 1 between Pt. Reyes Station and Bolinas. Several historical observations (>10 years old) on eBird (eBird 2024) near Bolinas and Inverness.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance.
<i>Bachyrampus marmoratus</i>	marbled murrelet	FT, SE	Breeds inland on mountains near coast. Associated with old growth redwood forest and forages in coastal waters.	Low; no occurrences recorded within 3 miles of project. Critical habitat is present in the project area (CNDDDB 2024). Suitable breeding habitat is present east of the entire project footprint.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance.
<i>Branta bernicla</i>	brandt	SSC	Winters along estuaries and sandy shores, usually	Low; frequently and recently observed throughout Bolinas,	None; work would not occur in suitable habitat.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			roosting in shallow, muddy bays and foraging in saltmarshes. Breeds in coastal marshes and meadows of the Arctic.	Inverness, Muir Beach and Stinson Beach during winter and early spring (eBird 2024). However, breeding and foraging habitat is not present within project bounds.	
<i>Chaetura vauxi</i>	Vaux's swift	SSC	Late stages of coniferous forests and deciduous forests mixed with coniferous trees. Species nests in hollow trees in forest; less commonly in chimneys. Aerial forager.	Moderate; frequently and recently observed throughout Bolinas, Inverness, Muir Beach and Stinson Beach (eBird 2024). Suitable breeding and foraging habitat present throughout the project area.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Charadrius nivosus nivosus</i>	western snowy plover	FT, SSC	Sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	Low; potentially suitable habitat exists around Stinson Beach and in the mudflats around Bolinas Lagoon (recon. surveys). The dunes at Stinson on the beach are largely degraded (recon. surveys). Tomales Bay could provide foraging habitat during low tides.	None; work would not occur in suitable habitat.
<i>Circus hudsonius</i>	northern harrier	SSC	Coastal salt and freshwater marsh.	Low; one occurrence within 3 miles of project	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			Nests and forages in grasslands. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	area (CNDDDB 2024). Frequently and recently observed throughout Bolinas, Inverness, Muir Beach and Stinson Beach (eBird 2024). Potentially suitable breeding and foraging habitat is present adjacent to the project area.	2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Coccyzus americanus</i>	western yellow-billed cuckoo	FT, SE	Riparian forest nesters, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024). Region is outside of the known species range.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Contopus cooperi</i>	olive-sided flycatcher	SSC	Primarily montane and northern coniferous forests. May occur at any elevation from sea level to timberline, but usually at mid- to high-elevation forest (3,000–7,000 feet). Breeds along forests edges and openings and edges of marshes.	Moderate; frequently and recently observed throughout Bolinas, Inverness, Muir Beach and Stinson Beach (eBird 2024). Breeding and foraging habitat is present throughout the project area.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Coturnicops noveboracensis</i>	yellow rail	SSC	Grassy marshes, meadows. Nests in shallow cups with concealing plants above it in shallow part of marsh or on damp soil. Non-breeding in coastal California and present only in winter.	Low; one occurrence within 3 miles of Inverness (CNDDDB 2024). Potentially suitable foraging habitat is present near project area in Inverness.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Cypseloides niger</i>	black swift	SSC	Coastal belt of Santa Cruz and Monterey counties; central and southern Sierra Nevada; and San Bernardino and San Jacinto Mountains. Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea-bluffs above the surf; forages widely.	Low; suitable breeding/foraging habitat present adjacent to the project area in Inverness, Bolinas, and Stinson Beach. One occurrence within 3 miles of project (CNDDDB 2024). Aerial forager and may forage/fly over project area, no suitable breeding habitat within project area.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance.
<i>Elanus leucurus</i>	white-tailed kite	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes	Moderate; frequently and recently observed throughout the project areas (eBird 2024). Documented to use old nests of other species such as common raven and red-tailed hawk, both	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			for foraging close to isolated, dense-topped trees for nesting and perching.	of which nest in eucalyptus groves. Suitable breeding and foraging habitat present within project area.	included in environmental training to ensure avoidance (PDIF ET-1).
<i>Falco peregrinus anatum</i>	American peregrine falcon	FD	Near wetlands, lakes, rivers, or other water; Nests on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression on ledge in an open site.	Moderate; frequently and recently observed throughout Bolinas, Inverness, Muir Beach and Stinson Beach (eBird 2024). Breeding and foraging habitat present throughout project area.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Geothlypis trichas sinuosa</i>	saltmarsh common yellowthroat	SSC	Coastal riparian and wetland areas. Requires thick continuous cover down to water surface for foraging; requires tall grasses, tule patches, and willows for nesting.	Low; twelve occurrences within 3 miles of Bolinas, Inverness, Muir Beach and Stinson Beach (CNDDDB 2024). Some potentially suitable foraging and breeding habitat exists near the project area. Many detections on eBird throughout project sites (eBird 2024).	None; work would not impact breeding or foraging habitat.
<i>Haliaeetus leucocephalus</i>	bald eagle	FD, SE	Lower montane coniferous forest, old growth. Ocean shore,	Low; frequently and recently observed throughout Bolinas,	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			lake margins, and rivers for both nesting and wintering. Most nests are within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine.	Inverness, Muir Beach and Stinson Beach (eBird 2024). Breeding habitat is present in forested areas, no foraging habitat present within project area.	pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Ixobrychus exilis</i>	least bittern	SSC	Freshwater and brackish marshes with dense, tall growths of aquatic or semiaquatic vegetation (particularly <i>Typha</i> , <i>Carex</i> , <i>Scirpus</i> , <i>Sagittaria</i> , or <i>Myricus</i> ) interspersed with clumps of woody vegetation and open water. Occasionally in salt marshes and mangrove swamps.	None; the most recent eBird occurrence is over 25 years old at Olema Marsh. No CNDDB occurrences in the project area.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Laterallus jamaicensis coturniculus</i>	California black rail	FP, ST	Wetlands and marshes. Nests in high portions of salt and freshwater marshes and flooded grassy vegetation.	Low; suitable breeding and foraging habitat found near the project area in Inverness, Bolinas, Stinson Beach, and Muir Beach. Nine occurrences	None; work would not occur in suitable habitat.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				within 3 miles of project (CNDDB, 2024).	
<i>Passerculus sandwichensis beldingi</i>	Belding's savannah sparrow	SE	Resident in salt marshes.	None; no known occurrences or observations within 3 miles of project (CNDDB, 2024). project is outside known species range.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Pelecanus occidentalis californicus</i>	California brown pelican	FD, SD	Colonial nesters on coastal islands just outside the surf line. Nests on coastal islands of small to moderate size which afford immunity from attack by ground dwelling predators. Roosts communally.	None; frequently and recently observed throughout the project (eBird, 2024), though no breeding or foraging habitat exists within the project area. May occur in bodies of water near project area or as flyovers.	None; work would not occur in suitable habitat.
<i>Phoebastria albatrus</i>	short-tailed albatross	FE	Breeds on remote islands; pelagic, lives on the open ocean.	None; no known occurrences or observations within 3 miles of project (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Progne subis</i>	purple martin	SSC	Montane forest and lowland oak and riparian woodland, and were restricted to areas with dead snags containing woodpecker holes.	Moderate; frequently and recently observed throughout Bolinas, Inverness, Muir Beach and Stinson Beach (eBird 2024). Suitable breeding	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			Nests in tree cavities or man-made birdhouses.	and foraging site present throughout project area.	(including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).
<i>Pterodroma sandwichensis</i>	Hawaiian petrel	FE	Breeds in remote montane locations within the Hawaiian Islands. May be found offshore throughout the Central Pacific during the non-breeding season.	None; no known occurrences or observations within 3 miles of project (CNDDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Rallus obsoletus obsoletus</i>	California Ridgway's rail	FE, SE, FP	Resident in coastal salt marshes.	Low; two occurrences within 3 miles of Bolinas and Stinson Beach (CNDDDB 2024). Suitable habitat adjacent to near Bolinas and Stinson Beach areas. No recent occurrences in eBird.	None; work would not occur in suitable habitat.
<i>Setophaga petechia</i>	yellow warbler	SSC	Riparian plant associations near water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	Moderate; frequently and recently observed throughout Bolinas, Inverness, Muir Beach and Stinson Beach (eBird 2024). Suitable breeding and foraging sites present throughout project area.	Low; nesting bird surveys would be conducted (PDIFs NB-1, NB-2, NB-3, NB-4) in addition to pre-treatment surveys and flagging prior to project activities to ensure avoidance. Nesting bird avoidance (including raptors) will be included in environmental training to ensure avoidance (PDIF ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Sternula antillarum browni</i>	California least tern	FE, SE, FP	Nest on beaches, mudflats, and sand dunes. Forages in bays, lagoons, creek mouths and tidal marshes.	None; one observation in Bolinas Lagoon in 2016 (eBird 2024). Low quality breeding habitat present near Bolinas and Stinson Beach, foraging habitat present near project areas in Inverness, Bolinas and Stinson Beach.	None; work would not occur in suitable habitat.
<i>Strix occidentalis caurina</i>	northern spotted owl	FT, ST, SSC	North Coast coniferous forest, old growth, redwood. Old-growth forests or mixed stands of old growth and mature trees. Occasionally in younger forests with patches of big trees. High, multistory canopy dominated by big trees, many trees with cavities or broken tops, woody debris and space under canopy.	Moderate; 2,639 occurrences within 3 miles of Inverness (CNDDDB 2024). Suitable breeding and foraging habitat is present around Inverness and north of Bolinas.	Low; work would occur outside nesting season or NSO protocol level surveys would be conducted in addition to pre-treatment surveys and flagging prior to project activities. Removal would focus on small trees and hazardous fuels; healthy, mature trees would not be removed. Removal of large hazard trees would occur with consultation with a qualified biologist (PDIFs NSO-1, NSO-2, NSO-3, NSO-4).
<b>Reptiles and Amphibians</b>					

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Chelonia mydas</i>	green sea turtle	FT	Marine; completely herbivorous; needs adequate supply of seagrasses and algae.	None; no known occurrences or observations within 3 miles of project area (CNDDDB 2024). No suitable habitat within project bounds.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Dicamptodon ensatus</i>	California giant salamander	SSC	Meadows and seeps within North Coast coniferous forest, and riparian forest. Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults typically found in wet forests under rocks and logs near streams and lakes.	Low; suitable habitat found near the project area in Inverness and Muir Beach. Sixteen occurrences within three miles of project (CNDDDB 2024). This species is highly associated with streams in wet coastal forests. This habitat type is infrequent in the project footprint which hugs open ridgelines, and riparian areas would be avoided within the project area.	Low; can disperse from other areas, and suitable breeding habitat would be avoided by project design in addition to conducting pre-treatment surveys and flagging prior to project activities to ensure avoidance.
<i>Emys marmorata</i>	northwestern pond turtle	FP, SSC	An aquatic turtle of ponds, marshes, rivers, streams,	Low; four occurrences within	Low; work would not occur in riparian habitat. Can disperse

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.3 miles from water for egg-laying.	3 miles of project (CNDDDB, 2024). Suitable habitat found within and near the project area in drainages near Inverness and Bolinas.	from other areas, and suitable breeding habitat would be avoided by project design. Additionally, pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Rana boylei</i> pop. 1	foothill yellow-legged frog - north coast DPS --	SSC	Largely confined to areas directly adjacent to partly shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.	Low; suitable habitat found near the project in perennial streams in Inverness and Stinson Beach. Two occurrences within 3 miles of project (CNDDDB, 2024).	Low; can disperse from other areas, and suitable breeding habitat would be avoided by project design. Additionally, pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.
<i>Rana draytonii</i>	California red-legged frog	FT, SSC	Breeds in ponds/slow moving streams, may use grassland and oak woodland for dispersal and foraging	High; 84 occurrences within 3 miles of Bolinas (CNDDDB 2024). Sequoia biologists observed 2 individuals within the Bolinas portion of the project; additional suitable habitat is present in wetlands observed	Low; can disperse from other areas, and suitable breeding habitat would be avoided by project design. Species will be included in environmental training to ensure avoidance (PDIF ET-1). Additionally, pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				in Inverness and near Muir Beach during reconnaissance surveys in April 2024. Critical habitat is present within and west of the Inverness area.	
<b>Invertebrates</b>					
<i>Bombus occidentalis</i>	western bumble bee	SC, SSC	Species is now largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Low; may occur within 3 miles of Bolinas, Muir Beach and Stinson Beach (CNDDDB 2024). Suitable habitat is present wherever there are floral resources. Observation approximately 1 mile east of Olema in 1968 (CNDDDB 2024).	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.
<i>Danaus plexippus plexippus</i> pop. 1	monarch - California overwintering	FC, SC, SSC	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts	Low; thirteen occurrences within 3 miles of Bolinas (CNDDDB 2024).	Low; can disperse from other areas; species life stages and host plant (milkweed). Overwintering sites would be

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
	population		located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Overwinter from November to February.	Overwintering habitat is present in eucalyptus groves in Bolinas, Stinson Beach, and Muir Woods (recon. surveys).	avoided from October-February. Additionally, pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.
<i>Speyeria zerene myrtleae</i>	Myrtle's silverspot butterfly	FE	Coastal dunes. Restricted to the foggy, coastal dunes/hills of the Point Reyes peninsula north to the Russian River; extirpated from coastal San Mateo County. Larval host plant thought to be <i>Viola adunca</i> .	Low; one occurrence within 3 miles of Inverness, Muir Beach, and Stinson Beach (CNDDDB 2024). Suitable habitat is present west of the project.	None; work would not occur in suitable habitat.
<b>Mammals</b>					
<i>Antrozous pallidus</i>	pallid bat	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Low; four occurrences within 3 miles of Inverness (CNDDDB 2024). Suitable habitat exists throughout the entire project area in large oaks and bays, redwoods and dead snags of pine and other conifers (Recon. surveys).	Low; work would occur outside the bat maternity roosting period or surveys conducted (PDIF RB-1) and roosting trees avoided (PDIFs RB-2, RB-3, and RB-4). Additionally, pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Aplodontia rufa phaea</i>	Point Reyes mountain beaver	SSC	Lives in underground burrows in north-facing slopes in moderately dense coastal scrub.	Low; five occurrences within 3 miles of Inverness (CNDDDB 2024). There is suitable habitat in Inverness, Pt. Reyes Station, Sea Haven, and Bolinas in redwood, mixed conifer forest and Bishop pine forest close to water (Recon. surveys).	Low; project activity within scrub habitat would be limited to removal hazardous trees and vegetation. Pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC	Found throughout California in a wide variety of habitats such as coniferous forests, mixed meso-phytic forests, deserts, native prairies, riparian communities, active agricultural areas, and coastal habitat types. Most common in mesic sites. Maternity roosts are found in caves, tunnels, mines, and buildings.	Low; seven occurrences within 3 miles of Bolinas and Inverness (CNDDDB 2024). Some potentially suitable habitat in the mixed conifer forests throughout the project, but primarily Inverness, Pt. Reyes Station, Bolinas, and Seahaven (Recon. surveys).	Low; work would occur outside the bat maternity roosting period or surveys conducted (PDIF RB-1) and roosting trees avoided (PDIFs RB-2, RB-3, and RB-4). Pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.
<i>Lasiurus frantzii</i>	western red bat	SSC	Roosts primarily in trees, 2 to 40 feet above ground,	Low; one occurrence within	Low; work would occur outside the bat maternity roosting period

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	3 miles of Bolinas and Inverness (CNDDDB 2024). Some potentially suitable habitat exists throughout the project in riparian zones. Most of the creeks have broad leaf deciduous riparian trees that could provide this species roost sites (Recon surveys). The California Central Coast population does not migrate.	or surveys conducted (PDIF RB-1) and roosting trees avoided (PDIFs RB-2, RB-3, and RB-4). Pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.
<i>Reithrodontomys raviventris</i>	salt marsh harvest mouse	FE, SE, FP	Marshes and wetland edges.	None; project is outside of known species range.	None; project area outside of species' range.
<i>Taxidea taxus</i>	American badger	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Low; two occurrences within 3 miles of Bolinas and Inverness (CNDDDB 2024). Potentially suitable habitat includes the grasslands along State Route 1	Low; pre-treatment surveys and flagging would be completed prior to project activities to ensure avoidance. Suitable habitat is unlikely to be encountered.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				between Pt. Reyes Station and Bolinas (Recon. surveys).	
<i>Zapus trinotatus orarius</i>	Point Reyes jumping mouse	SSC	Wet, marshy coastal meadows	Low; three occurrences within 3 miles of Inverness and Muir Beach (CNDDDB 2024). Suitable habitat is present project-wide in wet, marshy coastal meadows, loose, humus-filled dark soils associated with coast redwood forests, thickets of deciduous woody vegetation along streams and seepage areas, and, less frequently, in grassy areas beneath open-canopied coniferous forests (recon. surveys).	None; wetlands are excluded from the project footprint.
<b>Fish</b>					
<i>Eucyclogobius newberryi</i>	tidewater goby	FE, SSC	Brackish water habitats along the California coast	None; no suitable habitat within	None; work would not occur in suitable habitat.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	project bounds. Critical habitat occurs near Inverness, Bolinas, and Stinson Beach sites.	
<i>Hesperoleucus venustus subditus</i>	southern coastal roach	SSC	Coastal streams	None; two occurrences within 3 miles of Inverness (CNDDDB 2024). Some potentially suitable habitat occurs near Inverness area, but streams are not included in project footprint.	None; work would not occur in suitable habitat.
<i>Oncorhynchus kisutch</i> pop. 4	coho salmon - central California coast ESU	FE, SE, SSC	Federal listing applies to populations between Punta Gorda and San Lorenzo River. State listing includes populations south of Punta Gorda. Require beds of loose, silt-free, coarse gravel for spawning. Also need cover, cool water and sufficient dissolved oxygen.	None; two occurrences within 3 miles of Inverness and Muir Beach (CNDDDB 2024). Some potentially suitable habitat occurs near Inverness and Muir Beach area, but waterways are not	None; work would not occur in suitable habitat.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Oncorhynchus mykiss irideus</i> pop. 8	steelhead - central California coast DPS	FT, SSC	From Russian River, south to Soquel Creek and to, but not including, Pajaro River. Also San Francisco and San Pablo Bay basins.	included in project area. None; two occurrences within 3 miles of Inverness (CNDDDB 2024). Some potentially suitable habitat occurs near Inverness, but waterways are not included in project area.	None; work would not occur in suitable habitat.
<i>Spirinchus thaleichthys</i>	longfin smelt	FC, ST, SSC	Aquatic, estuary. Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15–30 ppt. but can be found in completely freshwater to almost pure seawater.	None; two occurrences within 3 miles of Inverness (CNDDDB 2024). Some potentially suitable habitat occurs near Inverness, but waterways are not included in project area.	None; work would not occur in suitable habitat.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
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**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. 1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA but not legally protected under Endangered Species Act [ESA] or California Endangered Species Act [CESA]).

2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA but not legally protected under ESA or CESA).

**CRPR Threat Ranks:**

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3 Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

**State:** FP = Fully Protected (legally protected)

SSC = Species of Special Concern (no formal protection other than CEQA consideration)

SE = State Listed as Endangered (legally protected)

ST = State Listed as Threatened (legally protected)

SD = State Delisted (no formal protection other than CEQA consideration)

SR = State Rare (legally protected under the Native Plant Protection Act)

**Federal:** FE = Federally Listed as Endangered (legally protected)

FT = Federally Listed as Threatened (legally protected)

FC = Federal Candidate for Listing

FD = Federal Delisted (no formal protection other than CEQA consideration)

**Potential for Occurrence Definitions**

**Not expected to occur:** Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

**May occur:** Suitable habitat is available; however, there are little to no other indicators that the species might be present.

**Known to occur:** Species has been documented within the treatment site.

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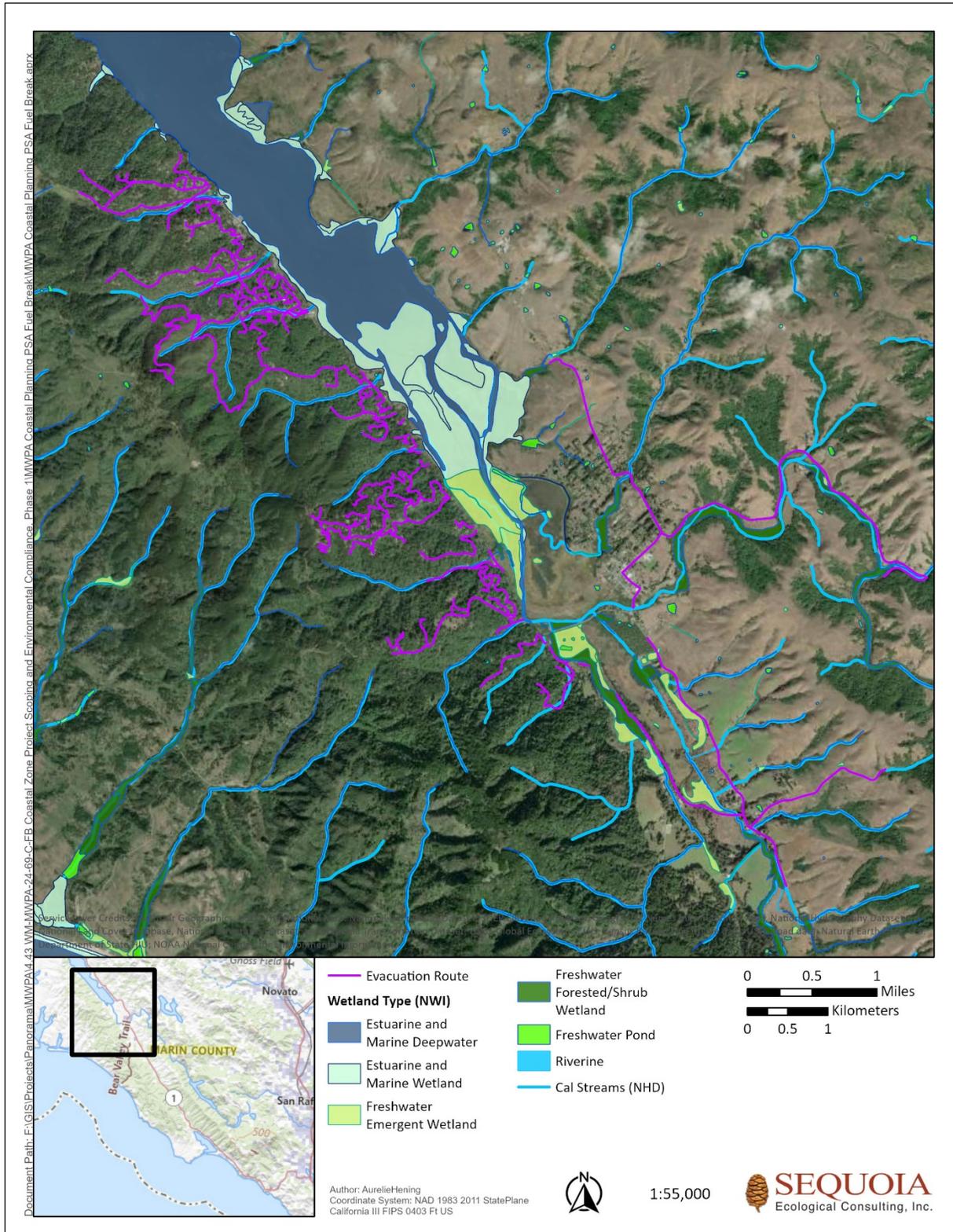
*Source: (CNDDDB 2024; eBird 2024; Calflora 2024)*

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**Figure 3** Inverness project area with NWI water/riparian data overlaid.

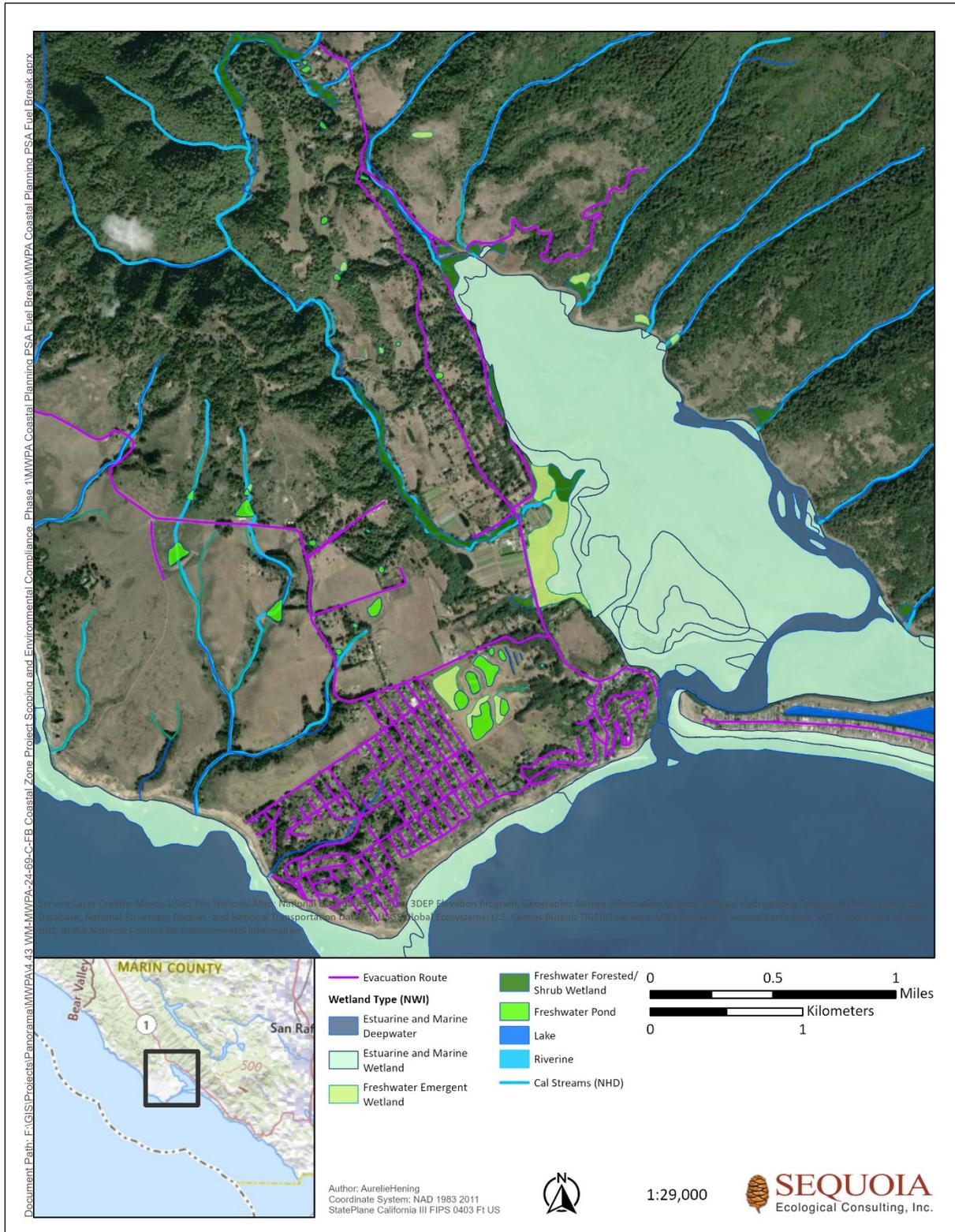


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**Figure 4 Bolinas project area with NWI water/riparian data overlaid.**

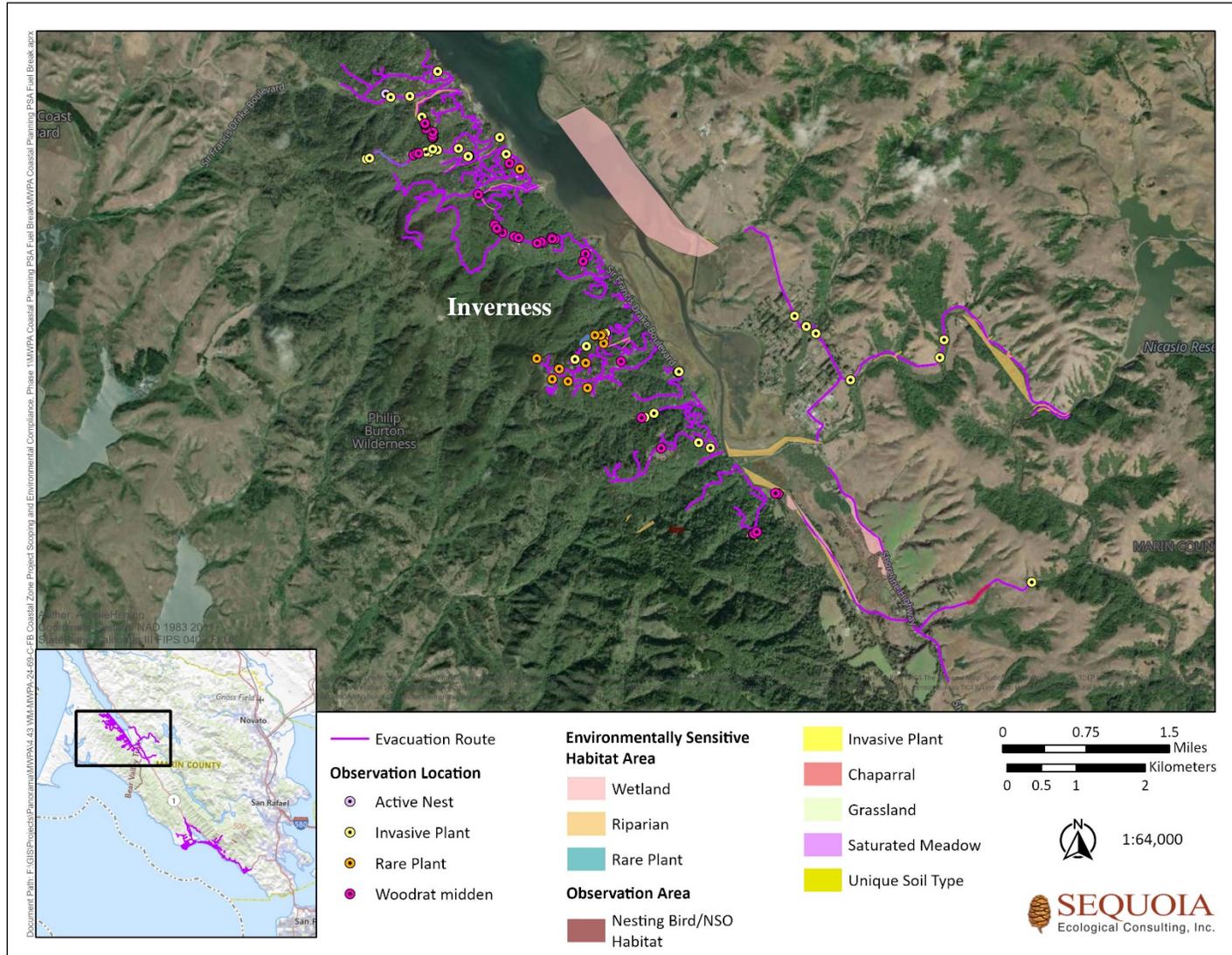






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**Figure 7 Inverness project area ESHA and survey results**

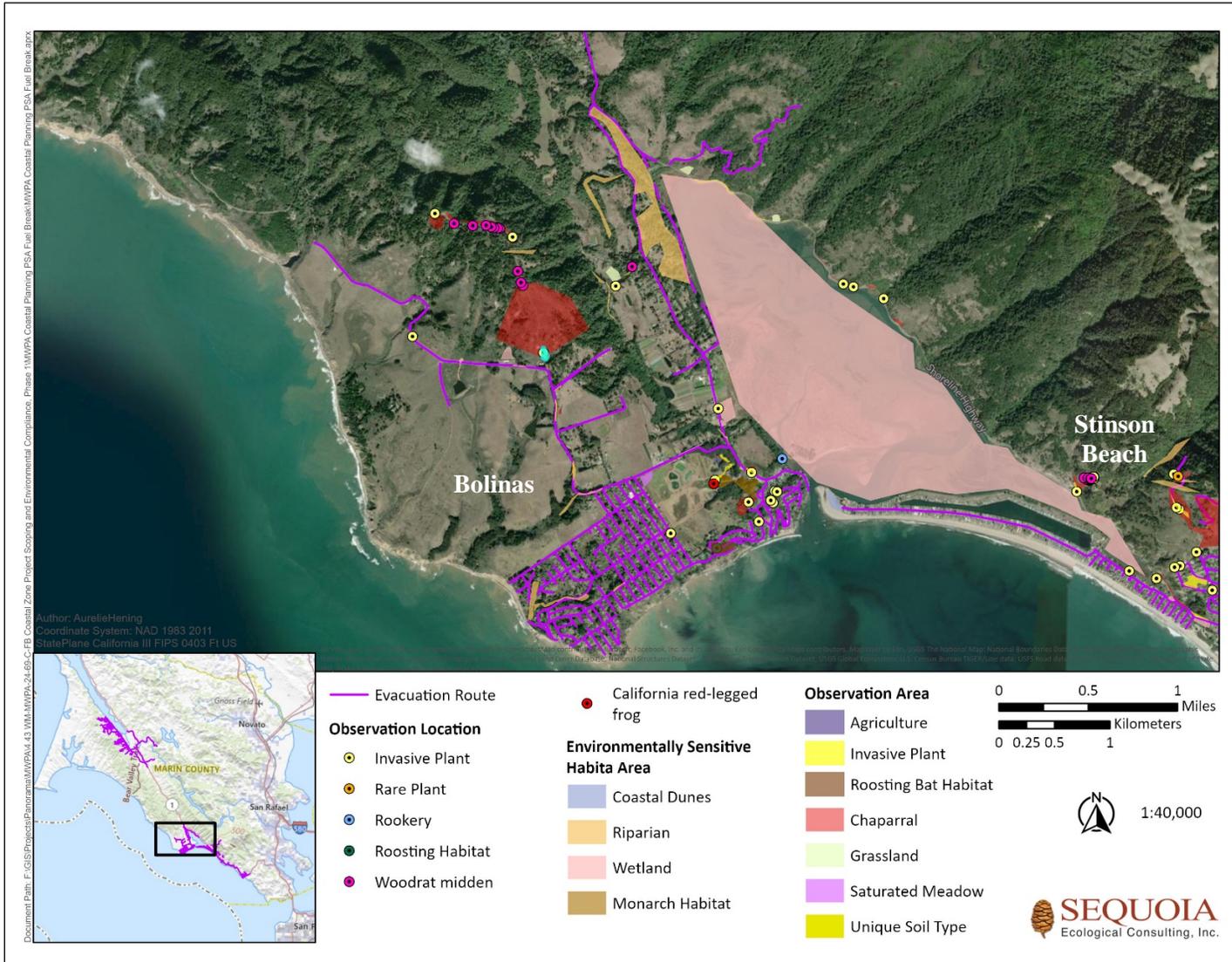


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**Figure 8 Bolinas project area ESHA and survey results**







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## Cultural Resources and Tribal Cultural Resources<sup>63</sup>

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equipment and vehicles for the vegetation treatment activities would operate from existing roadways. No intense ground disturbing activities (e.g., discing) would occur. While some hand pulling of invasive species may occur, the potential to disturb cultural resources is generally low since this work results in little ground disturbance and no heavy equipment. Workers would participate in a cultural training prior to project implementation (CUL-1) and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided conducted (CUL-2). If any resources are discovered during implementation that require monitoring to continue treatment in the area, a qualified archaeological would be present and as appropriate, a tribal monitor would be invited to monitor during ground disturbance (CUL-5). Significant impacts on cultural resources and human remains would not occur.

## Energy

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

## Geology and Soils

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Vehicle travel and access as well as operation of equipment would occur along the existing roadways and fire roads. After the vegetation thinning is completed, erosion and topsoil loss through loss of root-soil matrix strength if root systems die is expected to be minimal. Root systems of larger vegetation and trees would generally be left in place, minimizing the potential for erosion. Serpentine soils, which are typically vulnerable to erosion, are documented within

<sup>63</sup> No tribal consultation requirement is associated with filing a notice of exemption per Assembly Bill 52 (PRC §21080.3.1.(b)).

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the project area. In Inverness, serpentine soils exist at the southern end of the project area around Bear Valley Road, State Route 1, and Sir Francis Drake Boulevard in Olema. In Bolinas, serpentine soils are documented at the northern end of evacuation routes along Mesa Road, Horseshoe Hill Road, Olema Bolinas Road and Fairfax Bolinas Road. In Stinson Beach, multiple evacuation routes in the northwestern section of the project area traverse serpentine soils. Lastly, much of the Muir Beach project area occurs on serpentine soils, especially along State Route 1 and within the Muir Beach community (Sequoia Ecological Consulting, Inc 2024). While some soil types present in work areas may be more prone to erosion than others, vegetation removal and cutting that maintain at least 70 percent of groundcover would not result in substantial erosion (Lang and McDonald 2005). Erosion control devices would be installed (GEO-1) in areas where erosion could occur. Pulling of large vegetation would not occur during rain events or when soils are saturated (GEO-3). Significant impacts related to erosion and loss of topsoil would not occur.

## Greenhouse Gas Emissions

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Vegetation thinning activities would involve manual and mechanical vegetation removal. Use of vehicles and equipment during these activities and vehicle travel to treatment areas would generate some GHG. Project activities would not generate significant quantities of GHG emissions<sup>64</sup>. These processes are not quantified but would fluctuate during initial treatment and future maintenance. Due to the current higher fuel loads, it is anticipated that a net release of carbon from removal of vegetation could occur, at least in the near-term as the ecosystem fuel loads are restored closer to pre-fire suppression conditions and wildland fire risk is minimized while ingress and egress is improved. The fluctuation would be insignificant compared to overall carbon stock in Marin County. Significant greenhouse gas emission impacts would not occur.

## Hazards and Hazardous Materials

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Trucks, vehicles, and equipment are used for ongoing vegetation management throughout Marin County. Workers handling hazardous materials are required to adhere to Occupational Safety and Health Administration (OSHA) and Cal/OSHA health and safety requirements to protect workers and minimize risks of accidental spills of fuels and lubricants. As part of the proposed project, spill prevention and response measures would be implemented that would ensure that hazardous materials are properly stored on-site and that any accidental releases of hazardous materials would be properly controlled and quickly cleaned up (HAZ-1).

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<sup>64</sup> BAAQMD has established thresholds of significance for GHG emissions meant primarily for evaluating GHGs associated with land-use development or stationary-source projects, but the thresholds are not recommended for vegetation-management projects (Flores 2020).

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Herbicides used under the proposed project would include those with the active ingredient triclopyr. All herbicide applications under the proposed project would be targeted. The proposed project would comply with all herbicide regulations (HAZ-4), including the Marin County Integrated Pest Management Policy and the U.S. Environmental Protection Agency (EPA) Hazardous Materials Transportation Act, Federal Insecticide, Fungicide, and Rodenticide Act, and the Agricultural Worker Protection Standards (WPS). Herbicides prohibited by the EPA would not be applied, and the proposed project would comply with the requirements of the WPS to protect workers applying herbicides from occupational exposure. The proposed project would also require the minimization of herbicide drift to public areas, herbicide containers would be triple rinsed at an approved site, and signage would be placed in any herbicide application area within 500 feet of adjacent public areas (HAZ-4). Off-road grading or other intense ground disturbance would not occur, ensuring that any potential existing contamination would not be disturbed and would not pose a risk to the environment or public.

## Hydrology and Water Quality

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Work areas would be accessed using existing roadways and fire roads. 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). Herbicide mixing would occur away from waterways in areas devoid of vegetation, and only herbicides approved for use in aquatic environments would be applied by hand in riparian habitats (HAZ-5). Some hand pulling could occur along roadways. 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).

Herbicides used for stump treatments would include the active ingredient triclopyr. The half-life of triclopyr varies dependent on the type of plant it is sprayed on. Triclopyr has a half-life range of 3 to 24 days in plants, and 8 to 46 days in soil. Due to its solubility, triclopyr has a half-life of around 1 day in water with light and 142 days without light (Strid et al. 2018). Herbicides would be applied in a targeted manner, and no broadcast or aerial spraying would occur. The herbicides proposed for use do not include the active ingredients that impair the nearby creeks and waterbodies. The proposed project would implement PDIFs HAZ-4 and HAZ-5. HAZ-4 would require that the project comply with all herbicide application regulations by ensuring that herbicide containers be triple rinsed with clean water at an approved site, and that herbicide application would not occur during rain events or if rain events are forecasted. HAZ-5 would ensure that herbicide mixing sites are located in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway, as well as using herbicides labeled for use in aquatic environments when using near aquatic habitats, such as ephemeral drainages. Significant water quality impacts would not occur.

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## Land Use and Planning

Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Implementation of treatment activities would not involve any new development or changes to land uses that could physically divide a community. The project is consistent with the objectives of the Marin Wildfire and the Marin County Community Wildfire Protection Plan (2020). All activities conducted would comply with local land use regulations and policies.

## Mineral Resources

Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Vegetation treatment activities would not result in the loss of availability of a known mineral resource because the work would occur along the evacuation routes and fire roads and would not permanently alter any features. Vegetation treatments intended to improve evacuation and ingress/egress would not alter land uses, access, or subsurface areas that could impact mineral resources.

## Noise

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed vegetation treatment activities would occur on weekdays between 8:00 am and 5:00 pm. This timeframe would conform with the appropriate noise ordinance (Marin County Noise Ordinance § 6.70.030(5)). The noise ordinances limits construction activities to Monday through Friday 7:00 am through 6:00 pm <sup>65</sup>, which the project activities would conform with. Work would progress along roadways, limiting noise in any one location to a few hours. Most recreationalists or motorists are only in a single area for a short duration and would be able to move away from noisy areas with little impact on their experience. Residences would experience noise associated with activities, but it is anticipated that activities in any one location would only occur for a few hours. A single resident may be able to hear equipment operating for a day as activities progress along the evacuation routes. 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.

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<sup>65</sup> While these activities are not construction and do not require a construction permit, some of the equipment generates noise levels similar to construction equipment (e.g., noise level of a chainsaw is  $\leq 82$  dBA  $L_{max}$  at 50 feet (US DOT 2008) such that a comparison could be made and justification for ensuring work hours conform.

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## Population and Housing

Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

## Public Services

Question	Yes	No
Relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

## Recreation

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Treatments would occur along roadways within the coastal zone. Vegetation treatment activities would be performed within 10 feet of roadways, generally, and up to 25 feet from road edge in some places. Fire road treatment would involve trimming encroaching and overhanging vegetation to maintain road access for fire equipment and emergency personnel. Treatment areas and trails that are accessible to the public may be closed for short durations during treatment activities. Some of the work areas are located near trails or fire roads where recreationalists could be located. Recreational trails would be unavailable if needed or flagged off during vegetation management activities, the treatments would be for a short duration in one area, typically for only a few hours to a few days. Signs would be posted at each end of herbicide applications areas and any intersecting trails notifying the public of the use of herbicides in recreational areas (HAZ-5). Ample recreational opportunities are available within and surrounding the West Marin Zone and Southern Marin Zone that the few displaced recreationalists could use if discrete areas are unavailable due to vegetation management activities. The proposed project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

## Transportation

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Potential for significant impact?

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Multiple crews could conduct vegetation management activities along roadways in a single day. A crew of 3 to 6 workers would likely be working at a single work area with up to three crews, in addition to a haul truck trip for each crew a day. An estimated 8 to 42 daily one-way vehicle trips would occur, which would not exceed the threshold of 110 trips per day<sup>66</sup>. The VMT associated with implementation of the proposed project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b). Chipping could be conducted as a method of vegetative debris disposal. Chipping would be performed away from roadways and would not be a hazard to passing motorists. No significant traffic impacts would occur.

## Utilities and Service Systems

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Biomass generated from vegetation removal activities may be processed using a chipper. As the vegetation grows back and follow up maintenance is conducted in future years, additional vegetative materials would be chipped and trucked away. Materials would be trucked to Marin Resource Recovery Center, which have a permitted capacity of 2,640 tons per day, or other appropriate processing facility, and would be able to accept the chipped material (CalRecycle 2024). No impact related to utilities and service systems would occur.

## Wildfire

Question	Yes	No
Relevant to the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential for significant impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The evacuation routes and fire roads are within the State Responsibility Area (SRA) in moderate, high, and very high fire hazard severity zones (CAL FIRE 2024). The purpose of the proposed project is to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur and to provide defensible space for fire suppression crews to safely defend communities. Fuel reduction crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). The proposed project would not impair an adopted emergency response plan or evacuation plan. The proposed project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The proposed project does not involve intense ground disturbing activities that could result in downslope or downstream flooding or landslides

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<sup>66</sup> The Office of Planning and Research identifies a screening threshold for a small land-use project as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer than this threshold may be assumed to cause a less-than-significant transportation impact (OPR 2018). Although a vegetation treatment project is not a land use project, it is assumed that the screening threshold would still apply to the proposed project.

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should a wildfire occur. Impacts to people and structures from increased fire risk would not occur.

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