

Notice of Exemption

21-2023-150

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

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

FILED

JUL 10 2023

SHELLY SCOTT
MARIN COUNTY CLERK

By J. GILARDI Deputy

Project Title: Novato Zone Northeast Novato Evacuation Route Project

Project Applicant: Novato Fire Protection District

Project Location – Specific: Vegetation treatment along prioritized roads in the Rush Creek neighborhood, Cherry Hill neighborhood, Black Point neighborhood, Green Point neighborhood, Vince Mulroy County Park, and Day Island areas.

Project Location – City:
City of Novato

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:

The purpose of the proposed project is to improve routes for evacuation throughout the Black Point neighborhood, Green Point neighborhood, Vince Mulroy County Park, and Day Island areas in the northeastern portion of the Novato Zone. Improving the vegetation clearance treatment along the identified routes would ensure safer evacuation for residents and better access for first responders and emergency vehicles. The proposed project would also improve access by reducing heat, flame, ember, and smoke impingement on roadways and nearby structures for evacuating residents in the event of an approaching wildfire.

Name of Public Agency Approving Project: Novato Fire Protection District

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

Exempt Status (check one):

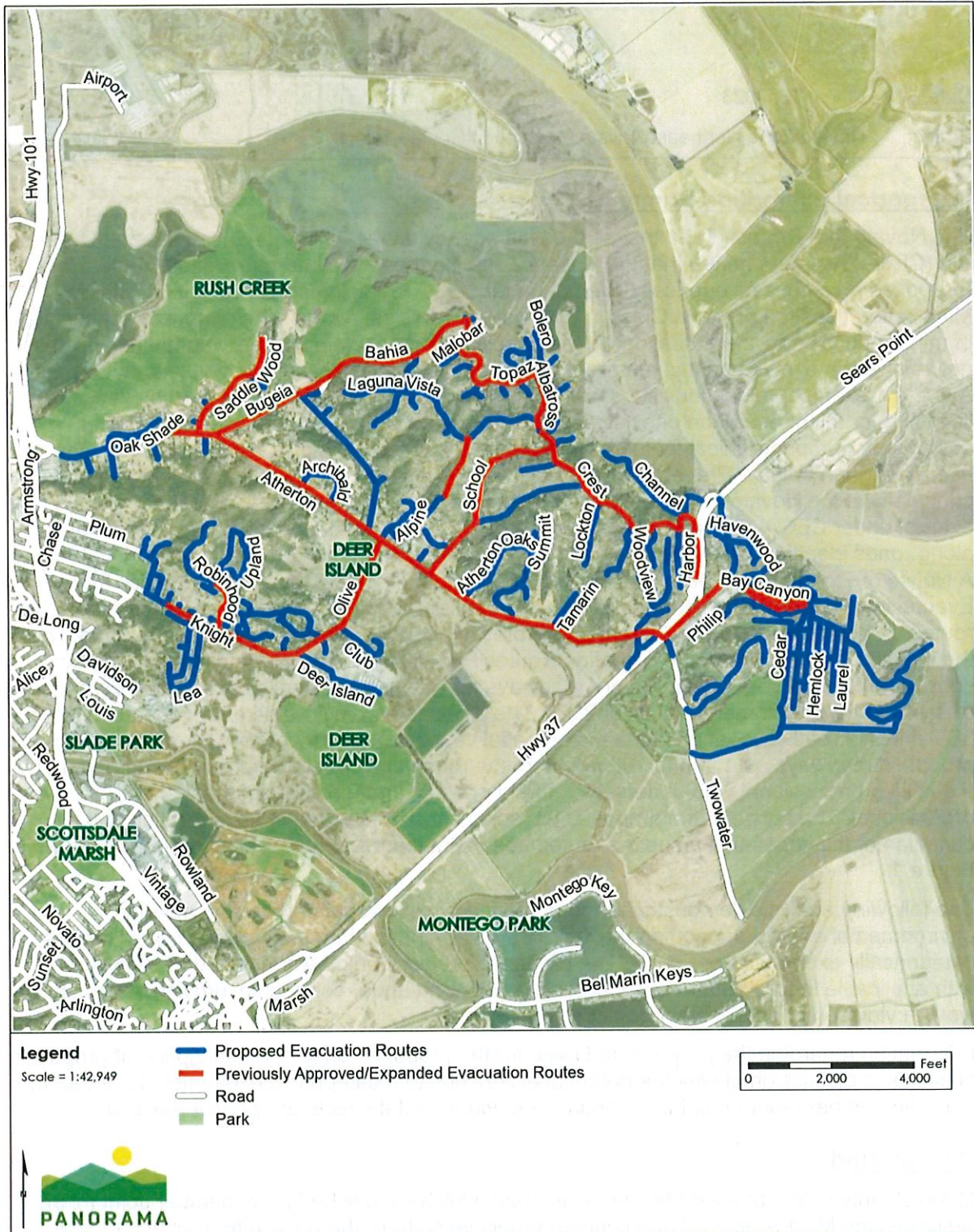
- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Common Sense Exemption (Sec. 15061(b)(3));
- Categorical Exemption. State type and section number: CEQA Guidelines section 15304(i). Minor alterations to land for fuel management activities; 15301. Existing facilities.
- 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 Class 1, for Existing Facilities. A Class 4 exempt project consists of minor public or private alterations in the

POSTED 7/10/23 TO 8/10/23

Figure 1 Proposed Project Roadways



Categorical Exemption Determination Memorandum

March 16, 2023

Page 2

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 the MWPA. Core Projects include those projects that focus on wildfire detection, notification, and evacuation; vegetation management and fire hazard reduction; grants management; and public education.

Purpose and Need

The purpose of the proposed project is to improve routes for evacuation throughout the northeastern portion of the Novato Zone. Improving the vegetation treatment along the identified routes would ensure safer evacuation for residents and better access for first responders and emergency vehicles. The proposed project would also improve access by reducing heat, flame, ember, and smoke impingement on roadways and nearby structures for evacuating residents in the event of an approaching wildfire.

Project Description

Treatment Area

The proposed project activities would be completed along prioritized roads in the Rush Creek neighborhood, Cherry Hill neighborhood (hill between Atherton Avenue and Olive Avenue), Black Point neighborhood, Green Point neighborhood, and the Vince Mulroy County Park and Day Island areas of the Novato Zone shown in Figure 1. A total of 35.7 miles of roads may be treated around these neighborhoods. As discussed above, vegetation thinning and removal was conducted along 6.6 miles of roadways under the Novato Zone Black Point Evacuation Routes Project and additional roadways noted by the Novato Fire Protection District. However, the roadside vegetation treatment area for the approved roadways only extends up to 10 feet from the road edge. The proposed project would add 35.7 miles of roads for vegetation treatment and extend vegetation treatment up to 100 feet from the road edge for both the previously treated and proposed roadways.

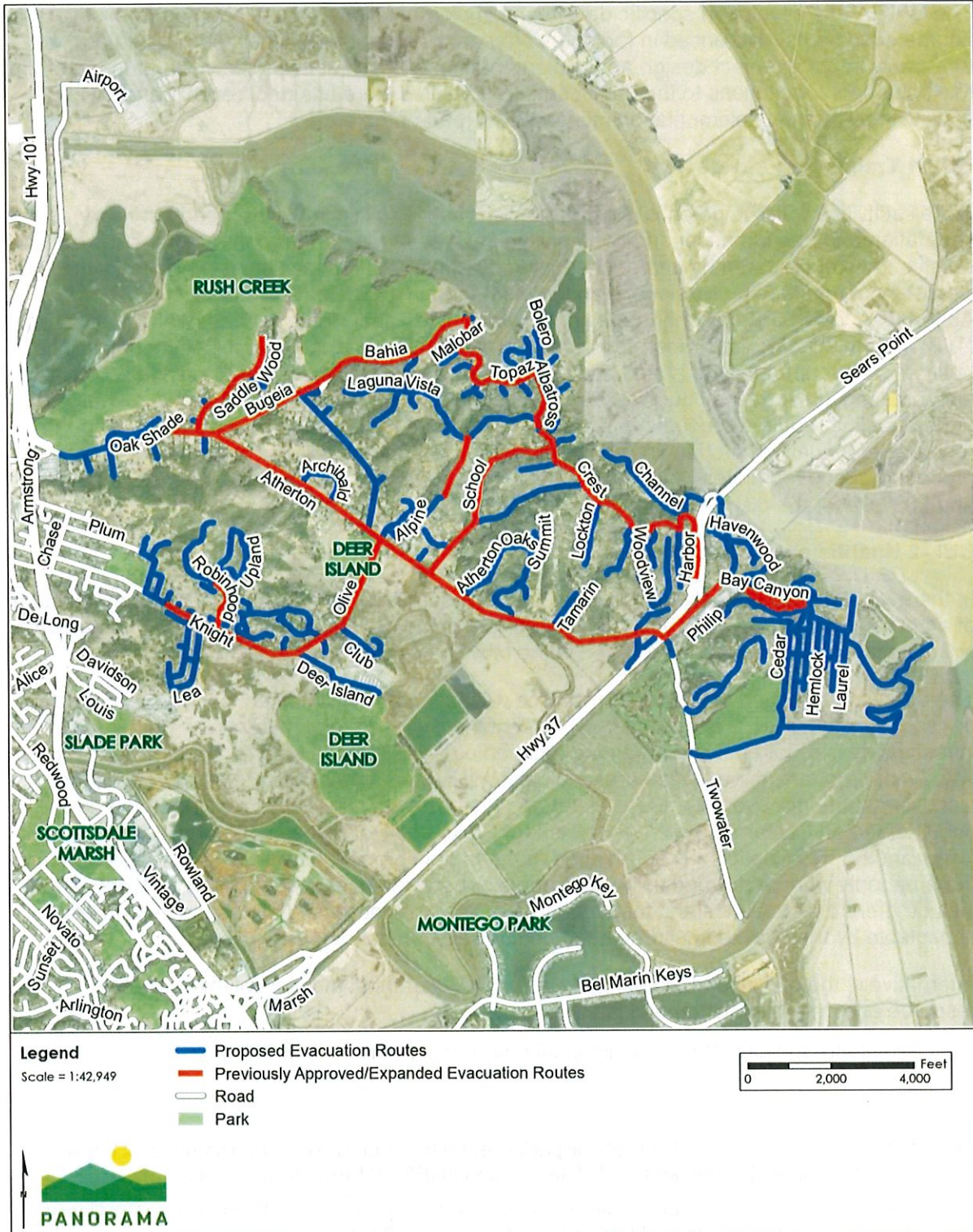
To improve evacuation routes, invasive, non-native, and fire-hazardous vegetation and accumulated dead biomass would be reduced typically within 10 feet from road edges but could extend up to 100 feet from road edges in some areas, due to the types of topographical features (e.g., steep slopes) or vegetation fuels (e.g., dense broom) present that may necessitate greater treatment distances beyond 10 feet. Areas where fuel treatments may need to extend beyond 10 feet would be determined by a forester or otherwise qualified professional who understands forest ecology and fuel management or a fire professional, prior to treatments. Work would focus on thinning and removing vegetation (e.g., overhanging limbs, understory brush) up to 15 feet above the road surface and up to 100 feet from road edges. Generally, invasive, non-native species, hazardous trees, and fire-hazardous vegetation would be targeted. Small trees under 8 inches diameter at breast height (DBH) may be removed from the understory. In areas with eucalyptus or other fire-hazardous invasive trees, removal of trees up to 10 inches DBH may be performed. 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. Fuel reduction treatments would avoid wetted marshes, streams, and wetlands that could occur along roadsides.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 4

Figure 1 Proposed Project Roadways



Categorical Exemption Determination Memorandum

March 16, 2023

Page 6

- A unique archaeological resource as defined by CEQA, and/or
- A potential tribal cultural resource (all archaeological resources could be a tribal cultural resource).

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

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

CUL-5 Cultural Resources Monitoring

Based on the results of CUL-3 and -4³, 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^{4,5}

All crew members and contractors will receive training from a qualified registered professional forester (RPF) or biologist prior to beginning a treatment project where sensitive biological resources could occur in the work areas. The training will describe the appropriate work practices necessary to effectively implement the appropriate project design and implementation features and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of potentially present special-status species with potential to occur; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; best management practices; and reporting requirements. As appropriate, the training will include protocols for work, such as specific trimming methods, where applicable. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF or biologist. The qualified RPF or biologist will immediately contact the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS), as appropriate, if

³ PDIF CUL-4 is not part of this proposed project.

⁴ 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.

⁵ Adapted from measures in the California Board of Forestry and Fire Protection California Vegetation Treatment Program Final Environmental Impact Report (CalVTP EIR), November 2019.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 8

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^{5,6}

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^{5,6}

When removing vegetation, focus first on removing invasive and highly flammable species, and dead or diseased vegetation. Retain beneficial, low-fire risk native plant species whenever possible.

GEO-1 Erosion and Soils Loss Stabilization Measures²

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.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 10

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

HAZ-2 Wildfire Risk Reduction^{1,4,5}

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

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

NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors^{5,7}

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.

⁷ Adapted from San Francisco Public Utilities Commission (SFPUC), Standard Construction Measures, July 2015.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 12

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 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 Alteration¹

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

NSO-4 Retain Dusky-footed Woodrat Nests^{1,6}

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

NB-1 Nesting Bird Season Avoidance^{1,5,6,8}

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through July 31st⁹. Not all species nest between the regulatory season, and active nests that are encountered year-round are protected.

NB-2 Nesting Bird Surveys^{1,5,6}

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

⁸ Adapted from Marin County Parks (MCP), Bird Nesting Survey Training Manual, 2017.

⁹ Note that the general nesting season between February 1 and July 31 is a guideline, and that birds may begin nesting beforehand, and complete nesting after these dates. Regardless, active nests are protected year-round. Avian nesting season may begin as early as January 1.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 14

RB-1 Prework Survey^{4,5}

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

RB-2 Avoidance of Maternity Roosts and Day Roosts⁴

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 Restrictions⁴

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 Removals⁴

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

SH-1 Riparian Resources – Project Design^{5,6}

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

Categorical Exemption Determination Memorandum

March 16, 2023

Page 16

would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (SH-1). Due to the 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 Novato Zone and greater Marin County and would not result in cumulative impacts as defined in CEQA Guidelines Section 15300.2. While 6.6 miles of the Novato Zone Black Point Evacuation Routes Project and additional roadways were treated in 2021/2022, these areas are included in the proposed treatment areas in order to extend the analyzed vegetation treatment area from 10 feet to up to 100 feet around existing roadways, and the intensity of treatment would not increase. 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 fuel reduction areas to help slow or stop the spread of wildfire 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 generally vegetated and suburban character would remain. The design and implementation of this proposed project (e.g., PDIFs 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., PDIFs NB-1, RB-1). The proposed project would modify the vegetation, but the natural character would remain, and the aesthetic change would not be substantial. Therefore, there are no unusual circumstances associated with the proposed project or the environment in which it would be implemented, and exception (c) does not apply.

(c) Scenic Highways:

No designated California State Scenic Highways occur in the vicinity of the evacuation routes; therefore, exception (d) does not apply (Caltrans, 2023).

(d) Hazardous Waste Sites:

Per the current government database of hazardous waste sites at the time of this filing, several hazardous waste sites are located adjacent to the evacuation routes in the areas that could have vegetation treatment (SWRCB, 2023). No intensive ground disturbing activities that could unearth potentially contaminated soils and expose the public or the environment to contamination would occur; therefore, exception (e) does not apply.

(e) Historical Resources:

Some hand pulling of invasive plants could occur. As part of the proposed project, workers would participate in a cultural training prior to proposed project implementation (CUL-1). Should

Categorical Exemption Determination Memorandum

March 16, 2023

Page 18

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. 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 the vegetation thinning activities would emit diesel particulate matter and criteria air pollutants. In a given day, it is assumed that chainsaws or other mechanical hand tools, and a chipper would operate for a few hours and up to one off-haul truck a day would travel to a green waste disposal center. No tilling or grading activities that could generate fugitive dust emissions 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"/>

Biological database searches for the vicinity of the fuel reduction zones were conducted (CDFW, 2022; CNPS, 2022). Of the species identified during the database search, species were determined to have potential to occur within the work areas if the species is known to occur in the vicinity of the sites and if the sites or immediate vicinity contains suitable habitat to support these species.

Special-Status Plants and Sensitive Vegetation Communities

Riparian and wetland habitats occur along or near road edges. No critical habitat for sensitive plants occurs within the vicinity of the work area. No serpentine soils are documented within the project work area and therefore serpentine-associated communities are not expected to occur (USDA, 2020). Many special-status plant species have a low to moderate potential to occur in the roadside work areas (refer to Table 1 for information and Figure 2 for locations of known occurrences in relation to the work area).

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

Categorical Exemption Determination Memorandum

March 16, 2023

Page 20

Wetlands

Seasonal streams and wetlands intersect or occur adjacent to the project roadways (USFWS, 2023) including within some preserved areas, as shown in Figure 5. Streams would be avoided by project activities. Due to the type of project and extent of the vegetation treatment activities out to typically 100 feet along roadways, wetlands may be encountered, but no activities would occur in wetlands. Training would ensure that workers avoid wetlands, particularly in the small areas where vegetation thinning extends further than 10 feet (ET-1). Significant impacts on wetlands would not occur.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 22

Figure 4 Northern Spotted Owl Observations

Figure omitted to protect northern spotted owl nest locations

Categorical Exemption Determination Memorandum

March 16, 2023

Page 24

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

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Sensitive Plants					
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	CNPS 1B.2	Wetland, riparian woodland	Low to Moderate- Potentially suitable habitat within the project area, and there are known occurrences within the 3 mile buffer but not in proximity to work area	Low – Can be identified and avoided with training (ET-1).
<i>Chloropyron molle</i> ssp. <i>molle</i>	soft salty bird's-beak	FE, CNPS 1B.2	Salt grass/pickleweed marshes at or near the limits of tidal action	None, no suitable habitat included in project area	None; No work would occur within wetlands or marshes, which can be identified and avoided with training (ET-1).
<i>Eriogonum luteolum</i> var. <i>caninum</i>	Tiburon buckwheat	CNPS 1B.2	Chaparral, coastal prairie, valley grassland, serpentine endemic	Low to Moderate- Potentially suitable habitat within the project area, and there are known occurrences within the 3 mile buffer but not in proximity to work area	Low – Can be identified and avoided with training (ET-1).
<i>Fritillaria liliacea</i>	fragrant fritillary	CNPS 1B.2	Heavy soil, open hills, fields near coast	Low to Moderate- Potentially suitable habitat within the project area, and there are known occurrences within the 3 mile buffer but not in proximity to work area	Low – Can be identified and avoided with training (ET-1).
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	congested-headed hayfield tarplant	CNPS 1B.2	Northern coastal scrub, valley grassland	Low to Moderate- Potentially suitable habitat within the project area, and there are known occurrences within the 3 mile buffer but not in proximity to work area	Low – Can be identified and avoided with training (ET-1).

Categorical Exemption Determination Memorandum

March 16, 2023

Page 26

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Athene cucularia	burrowing owl	SSC	Nests in grassland burrows	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	training for crews (RB-1, RB-2, RB-3, RB-4, ET-1). Low – work will occur outside nesting season or surveys will be conducted and active burrows avoided (NB-1, NB-2, NB-3, NB-4). Species will be included in environmental training to ensure avoidance (ET-1).
Charadrius nivosus nivosus	western snowy plover	SSC	Nests in coastal dunes	None, nests in coastal dunes	None
Corynorhinus townsendii	Townsend's big-eared bat	SSC	caves, mines, bridges, building, rock crevices, tree hollows in coastal lowlands, and cultivated valleys; prefer roosting in caves or other similar open spaces	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – work will occur outside the bat maternity roosting period or surveys conducted and roosting trees avoided. Bat identification and roosting avoidance will be included in the environmental training for crews (RB-1, RB-2, RB-3, RB-4, ET-1).
Elanus leucurus	white-tailed kite	FP	open oak grassland, desert grassland, farm country, marshes with trees for perching and nesting	Moderate to high - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low – work will occur outside nesting season or surveys will be conducted and active nests avoided (NB-1, NB-2, NB-3, NB-4). Species will be included in environmental training to ensure avoidance (ET-1).
Emys marmorata	western pond turtle	SSC	Freshwater ponds and streams	High - Occurrence documented within project area	Low – Can disperse from other areas, suitable breeding habitat will be

Novato Zone Northeast Novato Evacuation Route Project - Marin Wildfire Prevention Authority

Categorical Exemption Determination Memorandum

March 16, 2023

Page 28

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Rallus obsoletus obsoletus	California Ridgway's rail	FP	Saltwater marshes, freshwater marshes, and mangrove swamps	Moderate - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	training to ensure avoidance (ET-1). Low – Work will occur outside nesting season or surveys conducted, and work will also not occur in wetlands and marshes (NB- 1, NB-2, NB-3, NB-4). Species habitat will be included in environmental training to ensure avoidance (ET-1).
Reithrodontomys raviventris	salt-marsh harvest mouse	FE, SE	Marshes and wetland edges	Moderate - Potentially suitable habitat within the project area, and there are known occurrences nearby part of project area	Low- No work will occur within wetlands or marshes and surveys. Species habitat will be included in environmental training to ensure avoidance (ET-1).
Spirinchus thaleichthys	longfin smelt	FC, ST	Aquatic	None; aquatic species. Aquatic areas are excluded from the project footprint.	None
Strix occidentalis caurina	northern spotted owl	FT, CT	Dense canopies of mature and old- growth forests. Nests in tree hollows	Low; suitable habitat not present in project area but occurs within 0.5 mile	Low; not known to occur in the area and species will be included in environmental training for avoidance (ET-1). In the event NSO are present, species will be protected by standard nesting bird surveys for avoidance (NB-1, NB-2, NB- 3, NB-4).

Notes:

Novato Zone Northeast Novato Evacuation Route Project - Marin Wildfire Prevention Authority

Categorical Exemption Determination Memorandum

March 16, 2023

Page 30

Cultural Resources and Tribal Cultural Resources¹⁰

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 roadside fuel reduction activities would operate from existing roadways. No intense ground disturbing activities (e.g., discing) would occur. While some hand pulling of invasive species may occur, the potential to disturb cultural resources is generally low since this work results in little ground disturbance and no heavy equipment. Workers would participate in a cultural training prior to project implementation (CUL-1) and should a previously unidentified cultural resource be discovered, work would halt in the area and the resource fully avoided 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 thinning 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 Novato Zone. Implementation of vegetation fuel reduction activities would not cause a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Geology and Soils

Question	Yes	No
Relevant to the project?	<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 paved 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 would generally be left in place, minimizing the potential for erosion. Serpentine soils, which are typically vulnerable to erosion, are not documented within the project area (USDA, 2020). While some soil types present in work areas may be more prone to erosion than others,

¹⁰ No tribal consultation requirement is associated with filing a notice of exemption per Assembly Bill 52 (PRC §21080.3.1.(b)).

Categorical Exemption Determination Memorandum

March 16, 2023

Page 32

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"/>

Vehicles and tracked equipment would be confined to existing roads. Riparian woodlands may be encountered but any vegetation trimming, or thinning, would be conducted by hand and alteration to and deposition of debris would be avoided within the bed, channel, or bank of a waterway (SH-1). Some hand pulling could occur 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). Erosion and subsequent sedimentation of waterways would not occur. Significant water quality impacts would not occur.

Land Use and Planning

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

Implementation of roadside vegetation thinning activities would not involve any new development or changes to land uses that could physically divide a community. The proposed project is consistent with Novato Ordinance 2019-2 Fire Code, the objectives of the Marin Wildfire Prevention Authority, and the Marin County Community Wildfire Protection Plan (2020). All activities conducted would comply with local land use regulations and policies. Any vegetation treatment activities that are conducted outside the roadway right-of-way would require landowner permission and permits, depending on the landowner. Several parcels owned by non-profits or managed by agencies are located along the evacuation routes and any work outside the road right-of-way would require coordination with the landowner to ensure the work meets the land title requirements.

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"/>

Fuel reduction activities would not result in the loss of availability of a known mineral resource because the work would occur along the evacuation routes and would not permanently alter any features. Vegetation thinning is 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"/>

Categorical Exemption Determination Memorandum

March 16, 2023

Page 34

Space Preserve. Fuel reduction activities would be performed within 10 feet of roadways, generally, and up to 100 feet from road edge in some places. Work would progress along the roadway limiting any road closures or partial blockages to a few hours and pedestrian access would remain open or an alternate route would be provided (TR-2). Ample recreational opportunities are available within and surrounding the Novato Zone (e.g., MCOSD open space preserves) that the few displaced recreationalists could use if discrete areas are unavailable due to vegetation management activities. The proposed project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

Transportation

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

Multiple crews could conduct vegetation management activities along roadways in a single day. Crew of up to eight workers would likely be working at a single work area. An estimated eight to 32 daily one-way vehicle trips would occur, which would not exceed the threshold of 110 trips per day¹³. 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 could be trucked to Marin Resource Recovery Center, West Marin Compost, or Redwood Landfill, which have a permitted capacity of 5,140 tons per day, or other appropriate processing facility, and would be able to accept the chipped material. 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"/>

¹³ The Office of Planning and Research identifies a screening threshold for a small land-use project as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer than this threshold may be assumed to cause a less-than-significant transportation impact (OPR, 2017). Although a vegetation treatment project is not a land use project, it is assumed that the screening threshold would still apply to the proposed project.

Categorical Exemption Determination Memorandum

March 16, 2023

Page 36

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