Notice of Exemption

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk County of: Marin
Marin Civic Center
3501 Civic Center Dr., Suite 234,
San Rafael, CA 94903

From (Public Agency)**:**
Bolinas Fire Protection District
100 Mesa Road, P.O. Box 126, Bolinas, CA 94924

FILED
07/19/2024
SHELLY SCOTT
MARIN COUNTY CLERK
By J. Cruz, Deputy
21 - 2024 - 129

Project Title: West Marin Zone Bolinas Eucalyptus Fuel Reduction Project

Project Applicant: Bolinas Fire Protection District

Project Location – Specific: The proposed activities would be completed within 500 feet of PG&E transmission lines, with the majority of the work occurring within 50 feet of Mesa Road and Olema-Bolinas Road and at the northeast corner of a parcel belonging to the Bolinas Community Public Utility District (BCPUD) in the unincorporated coastal community of Bolinas.

Project Location – City:
Bolinas

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:
Extreme storms over the past two winters have left significant dead and downed trees, branches, bark, and brushy fuels in between standing trees. These ground and ladder fuels greatly increase the risk of wildfire spreading to the overstory, endangering PG&E transmission lines and public safety. The purpose of the proposed project is to improve a key evacuation route by reducing fuel loads, in addition to reducing wildfire risks to life, property, and critical infrastructure. Additionally, the proposed project would improve the effectiveness of wildfire suppression efforts by creating defensible space.

Name of Public Agency Approving Project: Bolinas Fire Protection District

Name of Person or Agency Carrying Out Project: George Krakauer

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: Section 15304(i). Minor alterations to land for fuel management activities. Section 15301. Existing Facilities for vegetation removal along roadways.
- ☐ Statutory Exemptions. State code number:_____

POSTED 07/19/2024 **TO** 08/18/2024

Reasons why project is exempt:
The project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 Minor Alterations to Land and Section 15301, Class 1 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 remove hazardous accumulated ground and ladder fuels within 500 feet of Pacific Gas & Electric (PG&E) transmission lines. The majority of the vegetation thinning and removal would typically occur within 50 feet of Mesa Road and Olema-Bolinas Road, which are identified as key evacuation routes in the Bolinas community. The proposed activities may involve the removal of hazardous trees that pose a risk of failure or fracture with the potential to cause injury to people or damage to property as determined by a qualified arborist or registered professional forester (RPF). The scope of the proposed project shown in Figure 1 is consistent with maintenance and minor alteration to the condition of vegetation along the evacuation routes and PG&E transmission lines.

Additionally, no healthy, mature, scenic trees would be removed; no work would take place within sensitive habitat, including ESHA, 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 potential exceptions listed under Section 15300.2 apply.

Lead Agency Contact Person:	**Area Code/Telephone/Extension:**
George Krakauer	(415) 868-1566

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: 7/19/2024 Title: Bolinas Fire Protection District

☒ 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

Date: July 18, 2024

Project: West Marin Zone Bolinas Eucalyptus Fuel Reduction Project

Categorical Exemption Summary

The Bolinas Fire Protection District as the lead agency under California Environmental Quality Act (CEQA) has determined that the Bolinas Eucalyptus Fuel Reduction Project (proposed project) is categorically exempt under CEQA Guidelines Section 15304, Class 4 for Minor Alterations to Land and Section 15301, Class 1, for Existing Facilities. A Class 4-exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1-exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The Marin Wildfire Prevention Authority (Marin Wildfire), acting in its capacity as the responsible agency under CEQA for its role in funding the proposed project, concurs with the Bolinas Fire Protection District's determination that the proposed project is exempt under CEQA. The proposed project would remove hazardous accumulated ground and ladder fuels within 500 feet of Pacific Gas & Electric (PG&E) transmission lines. However, the majority of the vegetation treatment would typically occur within 50 feet of Mesa Road and Olema Bolinas Road, which are identified as key evacuation routes in the Bolinas community. The scope of the proposed project shown in Figure 1 is consistent with maintenance and minor alteration to the condition of vegetation along the evacuation routes and PG&E transmission lines.

Background

Marin County voters passed Measure C in 2020, which established a 17-member Joint Powers Authority, the 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. The 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 the 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.

Purpose and Need

Extreme storms over the past two winters have left significant dead and downed trees, branches, bark, and brushy fuels in between standing trees. These ground and ladder fuels greatly increase the risk of wildfire spreading to the overstory, endangering PG&E transmission lines and public safety in the event of an ignition. The purpose of the proposed project is to improve a key evacuation route by reducing fuel loads, as well as reducing wildfire risks to life, property, and critical infrastructure. Additionally, the proposed project would improve the effectiveness of wildfire suppression efforts by creating defensible space along the roadsides.

Figure 1 Project Location

West Marin Zone Bolinas Eucalyptus Fuel Reduction Project - Marin Wildfire Prevention Authority

Project Description

Treatment Area

The proposed activities would be completed within a 19.5-acre fuel reduction area within the Bolinas coastal community, as shown in Figure 1. The proposed project is within the Coastal Zone under the jurisdiction of the Marin County Local Coastal Program (LCP) that governs development in the coastal areas of Marin County and is exempt from a Coastal Development Permit as it is consider a repair and maintenance project consistent with the Marin Municipal Code § 22.68.050. The removal of hazardous trees, dead and downed vegetation, and understory thinning, referred to herein as “vegetation treatments” would primarily be concentrated within 50 feet of Mesa Road and Olema Bolinas Road and at the northeast corner of a parcel belonging to the Bolinas Community Public Utility District (BCPUD), but treatments could occur in the entire area, which is within 500 feet of PG&E transmission lines.

Fire-hazardous vegetation comprised of dead and downed trees and branches would be targeted. Fuel reduction work would involve pruning tree branches up to 10 feet above ground, removal of dead/downed branches, and the removal of small diameter (generally less than 12 inches diameter at breast height [DBH]) dead and downed trees. Understory ladder fuels including non-native, invasive Scotch broom and French broom and shrub-like understory tree saplings would be removed or thinned, typically by hand pulling. The proposed activities would involve the removal of hazardous trees that pose a risk of failure or fracture with the potential to cause injury to people or damage to property as determined by a qualified arborist or registered professional forester (RPF). No healthy, mature, scenic trees would be removed under this proposed project. Live, healthy standing eucalyptus trees would not be removed as part of this proposed project. Fuel reduction treatments would avoid environmentally sensitive habitat areas (ESHA)[1] as defined by the Marin County Local Coastal Program, wetted streams, and wetlands within the proposed project area.

Treatment Method

Hand tools including chainsaws, pole saws, clippers, chipper and a truck would be used for removing the brush, bark, understory fuels, and dead and downed trees. Off-road heavy equipment would not be needed.

Herbicides 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 Garlon 4 Ultra (i.e., herbicide with the active ingredient triclopyr) and would be painted on the stumps in a

[1] 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).

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

Proposed project debris would be disposed of through chipping and hauling and chipping and broadcasting. A trailer-mounted chipper with the capacity to accept up to 12-inch diameter vegetation and a chipper truck would be operated from existing trails and roads. Road shoulders may be used as well. The vegetative material would be fed through the chipper and broadcast at the treatment area or hauled away for disposal. Vegetation left at and spread on work areas would be chipped to less than 3 inches in size and would be applied at most to 2 to 4 inches in depth to minimize risk of fuel buildup and wildfire ignition. Disposed debris would be hauled to the Bolinas Resource Recovery Site for composting or other appropriate facility.

Workers

A single crew would consist of 6 to 10 persons, one chipper operator (Marin County Fire Department), one Project Manager, and one Project Coordinator (Bolinas Fire Protection District).

Site Access

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

Schedule and Duration

Project activities would be conducted on weekdays from 8 am to 5 pm, starting in August 2024 and lasting for 10 workdays. Maintenance consisting of removal of newly dead and downed vegetation may occur annually based on inspections.

Project Design and Implementation Features

The MWPA has developed specific design and implementation features adapted from several source documents referenced in footnotes after each name that would be incorporated as applicable into the proposed project design and implementation for each of its projects. The following specific design and implementation measures are part of the proposed project:

CUL-1 Training[2]

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 [3]

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

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

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

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

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

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

[2] 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.

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

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 -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[4,5]

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.

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

[5] 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

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[6,7]

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[8,9]

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.

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

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

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

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

IP-3 Treat Invasive Plants Prior to Seeding[10,11]

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[12,13]

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[14]

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.

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

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

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

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

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

- 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

HAZ-1 Leak Prevention and Spill Cleanup [15,16]

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

[15] 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.

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

- 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 [17,18,19]

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

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

HAZ-4 Application of Herbicides[20]

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.

[17] 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.

[18] 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.

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

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

  - 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[21]

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

- Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway.
- Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry.
- No terrestrial or aquatic herbicides will be applied within Watercourse and Lake Protection Zones (WLPZs) of Class I[22] and II[23] 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.

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

[22] 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.

[23] 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.

NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors[24,25]

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

NB-1 Nesting Bird Season Avoidance[26,27,28,29]

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

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

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

[26] 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.

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

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

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

NB-2 Nesting Bird Surveys[30,31,32]

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

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

Nesting bird surveys will occur within no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7 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[33,34,35,36]

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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[30] 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.

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

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

[33] 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.

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

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

[36] 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

- 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[37,38,39,40]

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

RB-1 Prework Survey[41,42]

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.

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[37] 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.

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

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

[40] 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

[41] 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.

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

RB-2 Avoidance of Maternity Roosts and Day Roosts[43]

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[44]

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[45]

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[46],[47]

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

[43] 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.

[44] 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.

[45] 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.

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

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

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[48,49]

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[50]

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

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

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[48] 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

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

[50] 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

Discussion of Potential Exceptions (CEQA Section Guidelines 15300.2)

(a) Location:

Two wetland areas were observed as overlapping within the proposed project site boundary and one perennial pond. The eucalyptus groves adjacent to the proposed project area provide suitable overwintering habitat for monarch butterflies. Suitable habitat on the project site is available for avian nesting, bat roosting, and western bumblebee and yellow-faced/obscure bumblebees. There are several small roadside runoff patches that support hydrophytic vegetation; however, no riparian ESHA occurs on the proposed project site. Sensitive habitats, including flowing watercourses and wetted wetland areas would be avoided by treatments. Therefore, due to the scope and design of the proposed project, it would not adversely affect riparian or wetland habitats as it would not affect shade or species diversity and could be beneficial by reducing wildfire risk; therefore, exception (a) does not apply.

(b) Cumulative Impact:

Other fuel reduction treatments are occurring in the West Marin Zone and greater Marin County, but would not be conducted within the same area as this proposed project and would not result in cumulative impacts as defined in CEQA Guidelines Section 15300.2. One community group has proposed thinning the eucalyptus trees in the same area as the proposed project, although this is not Marin Wildfire-funded or proposed and has not been authorized at the time of this Notice of Exemption (NOE). Approximately 10 years ago, a two-phase vegetation management project performed similar activities as the proposed project within the proposed project area in coordination with the Marin Municipal Water District, Marin County Fire Department, and Bolinas Fire Protection District. 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, including Mesa Road and Olema Bolinas Road in the unincorporated community of Bolinas. 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 and PG&E 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., 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 project activities are considered routine and are prevalent throughout Marin County and Bay Area region. Sensitive waterways and special-status species would be avoided. Significant effects on special-status species would not occur (e.g., NB-1, RB-1). The proposed project would modify the vegetation, but the natural character would remain, and the aesthetic changes 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:

No designated California State Scenic Highways occur in the vicinity of the work areas such that fuel reduction treatments could be visible; 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, no open hazardous waste sites are located within or adjacent to the work areas. One site evaluation site and two closed sites are located within 0.25-mile of the proposed project site, however they do not overlap with the proposed project work area (DTSC 2024; SWRCB 2024). No intense 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. The proposed project does not propose any intense ground-disturbing activities. As part of the proposed project, workers would participate in cultural training prior to project implementation (CUL-1). Should a previously unidentified cultural resource be discovered, work would halt in the area and the resource would be fully avoided or only methods allowed by a qualified cultural resource specialist/archaeologist would be implemented (CUL-2). 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.

Aesthetics

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

The visual character along Mesa Road and Olema Bolinas Road and at the northeast corner of a parcel belonging to the BCPUD is generally undeveloped and is interspersed with low density urbanized areas. Vegetation consists of areas forested with eucalyptus trees. Surrounding the Mesa and Olema Bolinas Roads are tidal wetlands, the Bolinas Lagoon, and Bolinas Bay. 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 nearby recreational areas and homeowners that are adjacent to the fuel reduction area.

Equipment and workers performing the work would be temporarily visible along these roadways. The roadway vegetation thinning would be in the area for up to 10 workdays, but the intensity of the treatments is relatively low due to use of hand crews.

Manual and mechanical removal of dead and downed vegetation and some individual hazard trees, as determined by a qualified arborist or RPF, as well as some understory thinning would occur generally within 50 feet of the road edge, which is within 500 feet of PG&E transmission lines. The vegetative material would be chipped or cut and either broadcast on site or hauled away from the work area. The grove of eucalyptus trees would remain. Chipped material that is spread on site would be visible during decomposition, but generally blends into the forest floor. Targeted herbicide application on the cut stumps may result in localized areas of dead foliage. Viewers in the immediate vicinity may notice changes in the appearance of the site due to the removal of dead and downed vegetation, localized areas of dead foliage, and understory thinning along the roadways. Views in the immediate foreground are also dominated by the man-made road itself, vegetation treatments along the edges of roadways, and a nearby BCPUD wastewater treatment facility and would not be considered significant visual degradation. These methods of vegetation treatments currently occur in the Western Marin Zone as well as throughout broader Marin County to create defensible space and reduce hazardous fuel loads along roadways and other critical infrastructure. 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 nearby roads or trails because the visual change would be minimal, is typical in the area, and would primarily occur within 50 feet from roadways. The natural characteristics of the area around the roadways 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?	☒	☐
Potential for significant impact?	☐	☒

The proposed vegetation treatments would not convert designated farmland to non-agricultural uses. Project activities would primarily involve removal of dead and downed vegetation and some individual hazard trees, and thinning of underbrush along evacuation routes and near transmission lines. 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?	☒	☐
Potential for significant impact?	☐	☒

Vehicles and handheld equipment used during vegetative treatment activities would emit diesel particulate matter and criteria air pollutants. In a given day, it is assumed that worker trucks, chainsaw, mechanical hand tools and a chipper would operate for a few hours per crew and up to one off-haul truck would travel to a green waste disposal center a day. No tilling or grading activities that could generate fugitive dust emissions would occur. Significant air quality impacts would not occur.

Biological Resources

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

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). Field surveys were conducted in April 2024 to document potential sensitive resources within the project site boundary and 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 surveys (eBird 2024; CNDDB 2024; Calflora 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 2 and Figure 3 present several land cover types that correlate with the ESHA overlay within the vicinity of the proposed project, and show that wetlands, riparian habitat, and maritime chaparral may be present.

Special-Status Plants, Sensitive Vegetation Communities, and ESHA

Potential ESHA boundaries were mapped by Sequoia based on desktop review and field verification. Field surveys resulted in four total ESHA identified: two wetland ESHAs within the project boundary, as well as two terrestrial ESHAs occupied by endangered wildlife outside of the project boundary but well within dispersal distance for both species observed.

Potential rare plant habitat was primarily found within the two wetland ESHAs that occur within the proposed project site, however, no rare plants were observed during surveys within the proposed project area. The site contains forested areas primarily dominated by eucalyptus trees and California bay laurel, with an understory of toyon, poison oak, French broom and cotoneaster. One section of chaparral habitat with infestation of broom was found on Olema Bolinas Road outside of the project site. Certain invasive plant species also were found in the proposed project area such as French broom, cotoneaster, and Himalayan blackberry. No sensitive vegetation communities were encountered on the project site 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 Sonoma alopercurus, Napa false indigo, Marin manzanita, Point Reyes salty bird's beak, Western leatherwood, Marin checker lily, Marsh microseris, and Tamalpais oak for avoidance if encountered in the fuel reduction area. 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 sensitive plant species have a low to no potential to be impacted by proposed project activities as shown in Table 1.

The blooming season for specified plants that may occur within the fuel reduction area ranges from January to October depending on the plant species. Initial treatment is anticipated to begin in August 2024 and work would be performed within the blooming season. Herbicides 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(U.S. 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). Any individuals found during the pre-work 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). Any individuals found during the pre-work surveys would be flagged for avoidance or modified methods. Significant impacts on native vegetation communities and special-status plants species would not occur.

Special-Status Wildlife

Suitable habitat for roosting bats and nesting birds were found within the on-site eucalyptus groves. The project site is within dispersal distance of known California red-legged frog. Habitat for overwintering monarch butterflies is adjacent to the project site (Sequoia Ecological Consulting, Inc 2024). Northern spotted owl were not found to occur or have a potential to occur within the proposed project site.

Large eucalyptus groves provide suitable nesting habitat for great-horned owls and other raptors, including white-tailed kite, roosting bats, white breasted nuthatch, oak titmouse, purple martin, and various species of woodpeckers. 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. According to the California Fish and Game Code Section 3503.5, it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation

adopted pursuant thereto. Initial project activities would generally be conducted August to September avoiding nesting birds and roosting bats.

If initial treatment activities or future maintenance must occur during nesting or maternity roosting seasons, 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 at the project site, 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). While the regulations do not clearly define a “nest”, the intent is to prevent take of these species. Removal of raptor nests, even outside of the nesting season for those species with strong site fidelity, could affect nesting success. The proposed project, including the hazardous tree removal as determined by a qualified arborist or RPF, does not involve removal of mature standing trees that could have a high likelihood for presence of raptor nests. If any standing dead eucalyptus trees are identified for removal and could have raptor nests, a survey to determine likelihood of reuse would be conducted in accordance with PDIFs. Studies have found that forest herbicides (e.g., triclopyr) used according to label directions are nontoxic and do not bioaccumulate or bioconcentrate in birds (Clark et al. 2009). Spot treatment and cut stump herbicide application would be employed, but no broadcast spray would occur. Due to the discrete application of herbicides by hand in a targeted manner, the proposed herbicide application would pose a low risk to bats and nesting birds.

Some individual hazard trees, as determined by a qualified arborist or RPF, would be removed as part of the proposed project, however there would be no removal of healthy, mature, standing eucalyptus trees and the groves on the project site were not observed to be used by overwintering monarchs. Due to the scale and scope of the removal of hazardous accumulated ground and ladder fuels, the adult western bumble bee and monarch would not be adversely affected as these species are mobile and could move away from any danger posed by equipment or humans. Monarchs are known to breed on milkweed, but typically in inland areas (5 miles or further from the coast). Additionally, no milkweed was observed on the project site. Western bumble bees typically nest underground in abandoned rodent burrows, hollows in decaying wood, or other cavities. Queen western bumble bees overwinter during November through the end of February and are known to nest in grass or burrows. New queen western bumble bees emerge during April through November. Herbicide overspray or drift could result in the removal of host plants, and may kill individual eggs, larvae, and pupae that are attached. Studies have shown there is little risk to insects from indirect contact with foliage after direct spray of herbicides (Bureau of Land Management (BLM) 2007). Off-road equipment that could crush burrows containing western bumble bees would not occur. Treatment activities are not anticipated to significantly, adversely affect monarch or western bumble bee species.

Portions of the project site are within dispersal distance of known California red-legged frog habitat. Wetland and streams that may provide habitat for this species would be avoided by project activities. 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 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 wetlands, 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

Two wetlands, also designated as ESHAs (refer above), are present within the proposed project boundary but no project activities would occur in wetlands. 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, wetlands are not anticipated to be encountered and no activities would occur in wetlands. Training would ensure that workers avoid wetlands (ET-1). Significant impacts on wetlands would not occur. Additionally, a biologist would mark the boundaries of any nearby wetlands to ensure avoidance.

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					
Allium peninsulare var. franciscanum	Franciscan onion	CRPR 1B.2	Cismontane woodland, valley and foothill grassland	Not expected to occur. 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.
Alopecurus aequalis var. sonomensis	Sonoma alopecurus	FE, CRPR 1B.1	Marshes and swamps (freshwater), riparian scrub	May occur. Known occurrences and suitable habitat are found near the Project area. Observations noted north of Bolinas (Calflora 2024).	Low; wetland and riparian areas would be avoided. Species would be included in environmental training to ensure avoidance (PDIF ET-1).
Amorpha californica var. napensis	Napa false indigo	CRPR 1B.2	Wetland, riparian woodland	May occur. Known occurrences and suitable habitat are found near the Project area (Calflora 2024).	Low; wetland and riparian areas would be avoided. Species would be included in environmental training to ensure avoidance (PDIF ET-1).
Amsinckia lunaris	Bent-flowered fiddleneck	CRPR 1B.2	Grassland, serpentine, gravelly slopes	Not expected to occur. No known occurrences or observations within Project area. One observation in 2019 north of Bolinas lagoon (Calflora 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
Arctostaphylos montana ssp. Montana	Mt. Tamalpais manzanita	CRPR 1B.3	Chaparral, valley and foothill grassland	Not expected to occur. No suitable habitat found within project area, no known occurrences or observations within Project area.	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Arctostaphylos virgata	Marin manzanita	CRPR 1B.2	Broadleaved upland forest, chaparral, closed-cone coniferous forest, north coast coniferous forest	May occur. Multiple observations and suitable habitat exists near Project area. Observations north of Project area as recently as 2018 (Calflora 2024). 20 occurrences within 3 miles of Project (CNDDB 2024).	Low; species would be included in environmental training to ensure avoidance (PDIF ET-1).
Calamagrostis crassiglumis	Thurber's reed grass	CRPR 2B.1	Slopes, meadows, coastal marshes	Not expected to occur. No known occurrences or observations within Project area.	None; work would not occur in suitable habitat and species is unlikely to occur.
Cardamine angulata	Seaside bittercress	CRPR 2B.2	Occurs usually in wetlands, occasionally in non-wetlands, redwood forest, mixed evergreen forest	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Carex leptalea	Bristle-stalked sedge	CRPR 2B.2	Bogs and fens, marshes and swamps, meadows and seeps (mesic)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Carex lyngbyei	Lyngbye's sedge	CRPR 2B.2	Marshes and swamps (brackish, freshwater)	Not expected to occur. No suitable habitat exists in the Project area. Two occurrences within three miles of Project (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Castilleja affinis var. neglecta	Tiburon paintbrush	CRPR 1B.2	Valley and foothill grassland (serpentinite)	Not expected to occur. No known occurrences or observations within 3 miles of Project area(CNDDB 2024)).	None; work would not occur in suitable habitat and species is unlikely to occur.
Castilleja leschkeana	Point Reyes paintbrush	CRPR 1A	Valley and foothill grassland (serpentinite), coastal	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Taxon is presumed extinct (Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Ceanothus decornutus	Nicasio ceanothus	CRPR 1B.2	Chaparral (maritime)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Ceanothus masonii	Mason's ceanothus	SR, CRPR 1B.2	Chaparral (openings, rocky, serpentinite)	Not expected to occur. No suitable habitat exists in the Project area. Ten occurrences within three miles of Project (Calflora 2024). More than 7 observations along Bolinas Ridge Trail approximately 2.5 miles northeast of Project area (Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
maritimum ssp. Palustre	Point Reyes salty bird's-beak Chloropyron	CRPR 1B.2	Marshes and swamps (coastal salt)	May occur. Multiple observations and suitable habitat known near Project area (Calflora 2024).	Low; can be identified and avoided with training. work would not occur in suitable habitat.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Chorizanthe cuspidata var. cuspidata	San Francisco Bay spineflower	CRPR 1B.2	Coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Chorizanthe robusta var. robusta	Robust spineflower	CRPR 1B.1	Coastal dunes, coastal scrubland	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Cirsium hydrophilum var. vaseyi	Mt. Tamalpais thistle	CRPR 1B.2	Serpentine seeps	Not expected to occur. No known occurrences or suitable habitat within Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Clarkia concinna ssp. raichei	Raiche's red ribbons	CRPR 1B.1	Coastal bluff scrub	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Collinsia corymbosa	Round-headed collinsia	CRPR 1B.2	Coastal dunes	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Delphinium bakeri	Baker's larkspur	FE, SE, CRPR 1B.1	Broadleaved upland forest, coastal scrub, valley and foothill grassland	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Delphinium luteum	Yellow larkspur	FE, SR, CRPR 1B.2	Chaparral, coastal prairie, coastal scrub	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Dermatocarpon meiophyllizum	Golden larkspur	CRPR 2B.3	Found on rocks along streams and lakes	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024; Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Dirca occidentalis	Western leatherwood	CRPR 1B.2	Broadleaved upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, north coast coniferous forest, riparian forest, riparian woodland	May occur. Four occurrences within three miles of Project (CNDDB 2024). One observation in 2014 approximately 1.5 miles east of Bolinas(Calflora 2024).	Low; can be identified and avoided with environmental training (PDIF ET-1). Work would not occur in riparian areas.
Entosthodon kochii	Koch's cord moss	CRPR 1B.3	Riverbanks on newly exposed soil	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024; Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Fritillaria lanceolata var. tristulis	Marin checker lily	CRPR 1B.1	Oak or pine scrub, grassland	May occur. Multiple observations and suitable habitat known to occur west of Project area near Agate Beach (CNDDB 2024; Calflora 2024). Eleven occurrences within 3 miles of Project (CNDDB 2024).	Low; bryophytes are unlikely to be impacted by project activities. Can be identified and avoided with environmental training (PDIF ET-1).
Gilia millefoliata	Dark-eyed gilia	CRPR 1B.2	Coastal dunes	Not expected to occur. No known occurrences or suitable habitat within Project area. Two	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				occurrences within three miles of Project (CNDDB 2024).	
Grindelia hirsutula var. maritima	San Francisco gumplant	CRPR 3.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Hemizonia congesta ssp. congesta	Congested-headed hayfield tarplant	CRPR 1B.2	Northern coastal scrub, valley grassland	Not expected to occur. No suitable habitat within Project area. Two occurrences within three miles of Project (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Hesperolinon congestum	Marin western flax	FT, ST, CRPR 1B.1	Chaparral, valley and foothill grassland, serpentine	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Holocarpha macradenia	Santa Cruz tarplant	FE, SE, CRPR 1B.1	Coastal prairie along central coast, grassy areas, clay soil	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Horkelia tenuiloba	Thin-lobed horkelia	CRPR 1B.2	Open chaparral	Not expected to occur. No suitable habitat within Project area. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Hypogymnia schizidiata	Island tube lichen	CRPR 1B.3	Grows on bark and wood of hardwoods and conifers in woodlands,	Not expected to occur. Project area is outside of known elevation range and no known observations in Project area.	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			isolated groves, and forests		
Lasthenia californica ssp. bakeri	Baker's goldfields	CRPR 1B.2	Grassland, dunes	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024)	None; work would not occur in suitable habitat and species is unlikely to occur.
Layia carnosa	Beach layia	FE, SE, CRPR 1B.1	Coastal bluff scrub	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Lessingia hololeuca	Woolly-headed lessingia	CRPR 3	Chaparral, valley and foothill grassland	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Lessingia micradenia var. micradenia	Tamalpais lessingia	CRPR 1B.2	Marshes and swamps (brackish, freshwater), riparian scrub	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Lilaeopsis masonii	Mason's lilaeopsis	CRPR 1B.1	Broadleaved upland forest, closed-cone coniferous forest, coastal prairie, coastal scrub, marshes and swamps (freshwater), north coast coniferous forest	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Limnanthes douglasii ssp. sulphurea	Point Reyes meadowfoam	SE, CRPR 1B.2	Coastal dunes	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Lupinus tidestromii	Tidestrom's lupine	FE, SE, CRPR 1B.1	Cismontane woodland, closed-cone coniferous forest, coastal scrub, valley and foothill grassland	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Microseris paludosa	Marsh microseris	CRPR 1B.1	Moist grassland, open woodland	May occur. One occurrence within 3 miles of Project (CNDDB 2024). Suitable habitat exists within and surrounding Project area.	Low; can be identified and avoided with training (PDIF ET-1).
Monardella sinuata ssp. nigrescens	Northern curly-leaved monardella	CRPR 1B.2	Chaparral, closed-cone coniferous forest	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Navarretia rosulata	Marin County navarretia	CRPR 1B.2	Rocky, serpentine	Not expected to occur. No known occurrences or observations within 3 miles of Project area(CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Pentachaeta bellidiflora	White-rayed pentachaeta	FE, SE, CRPR 1B.1	Serpentine grasslands	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Piperia elegans ssp. decurtata	Point Reyes rein orchid	CRPR 1B.1	Coastal bluff scrub, coastal prairie	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Pleuropogon hooverianus	North Coast semaphore grass	ST, CRPR 1B.1	Meadows, vernal pools	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Polygonum marinense	Marin knotweed	CRPR 3.1	Marshes and swamps (brackish, coastal salt)	Not expected to occur. No suitable habitat within Project area. One observation in 2018 in Bolinas Lagoon OSP (Calflora 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Quercus parvula var. tamalpaisensis	Tamalpais oak	CRPR 1B.3	Understory conifer woodland	May occur. Six occurrences within three miles of Project (CNDDB 2024).	Low; can be identified and avoided with training; species can be identified and avoided outside of the blooming period.
Rhynchospora californica	California beaked-rush	CRPR 1B.1	Bogs and fens, lower montane coniferous forest, marshes and swamps (freshwater), meadows and seeps (seeps)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Sagittaria sanfordii	Sanford's arrowhead	CRPR 1B.2	Marshes and swamps (shallow freshwater)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Sidalcea calycosa ssp. rhizomata	Point Reyes checkerbloom	CRPR 1B.2	Marshes and swamps (freshwater, near coast)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Sidalcea hickmanii ssp. viridis	Marin checkerbloom	CRPR 1B.1	Chaparral (serpentinite)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Sidalcea malviflora ssp. purpurea	Purple-stemmed checkerbloom	CRPR 1B.2	Broadleaved upland forest, coastal prairie	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Streptanthus anomalus	Mount Burdell jewelflower	CRPR 1B.1	Cismontane woodland (openings)	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Project footprint is outside of species known range.	None; work would not occur in suitable habitat and species is unlikely to occur.
Thamnolia vermicularis	Whiteworm lichen	CRPR 2B.1	Chaparral, valley and foothill grassland	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). No suitable habitat within Project area.	None; work would not occur in suitable habitat and species is unlikely to occur.
Trifolium amoenum	Two-fork clover	FE, CRPR 1B.1	Coastal bluff scrub, valley and foothill grassland (sometimes serpentinite), moist,	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			heavy soils, disturbed areas		
Triquetrella californica	Coastal triquetrella	CRPR 1B.2	Coastal bluff scrub, coastal scrub	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat and species is unlikely to occur.
Special Status Wildlife					
Birds					
Accipiter atricapillus	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 meters; widespread across taiga north to tree line	Not expected to occur. No recent occurrences of the species in Project area (eBird 2024; CNDDB 2024). Breeding habitat is not present. Potential foraging habitat present within Project area.	None; work would not impact breeding habitat and would not take place during nesting bird season (PDIF NB-1). If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-2).
Agelaius tricolor	Tri-colored blackbird	CT, SSC	Wetlands and grasslands	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). No	None; work would not occur in suitable habitat.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				suitable breeding or foraging habitat within Project bounds.	
Aquila chrysaetos	Golden eagle	FP	Grasslands	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Breeding and foraging habit does not exist within the Project area	None; work would not occur in suitable habitat.
Asio flammeus	Short-eared owl	SSC	Grasslands, marshes, scrub habitats. Nests on the ground in grasslands or shrublands	Known to occur. Frequently and recently observed throughout the Project area. Uncommon breeder around San Francisco Bay area, uses habitat primarily for foraging (eBird 2024).	Low; work would not impact breeding habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Asio otus	Long-eared owl	SSC	Dense woodlands and coniferous forests adjacent to open areas	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Some potentially suitable breeding and foraging habitat within Project bounds. This enigmatic species is difficult to detect in California.	Low; work may impact breeding and foraging habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Brachyramphus marmoratus	Marbled murrelet	FT	Breeds inland on mountains near coast	Not expected to occur. No occurrences recorded within 3 miles of Project (CNDDB 2024). No suitable breeding or foraging	None; work would not occur in suitable habitat.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				habitat within Project area or immediately surrounding Project.	
Branta bernicla	Brant	SSC	Winters along estuaries and sandy shores, usually roosting in shallow, muddy bays and feeding on salt marshes. Breeds in coastal marshes and meadows of the Arctic	Not expected to occur. Frequently and recently observed near the Project area during winter and early spring, but no suitable breeding or foraging habitat within Project area (eBird 2024).	None; work would not occur in suitable habitat.
Chaetura vauxi	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	Known to occur. Frequently and recently observed throughout the area surrounding the Project. Occurs as local breeder in coastal forests of Marin County, forages above canopy (eBird 2024).	Low; work may impact breeding habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Circus hudsonius	Northern harrier	SSC	Marshes, fields, prairies. Nests on ground in dense field or marsh	Not expected to occur. One occurrence within 3 miles of Project (CNDDB 2024). Frequently and recently observed near Bolinas, but breeding and foraging habit	None; work would not occur in suitable habitat.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				does not exist within the Project area (eBird 2024).	
Coccyzus americanus	Yellow-billed cuckoo	CT	Dense woodlands with nearby riparian habitat	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Region is outside the known species range.	None; region is outside of known species range.
Contopus cooperi	Olive-sided flycatcher	SSC	Douglas fir forest	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Potential breeding and foraging habitat within Project area. Forages above forest canopy or within forest openings.	Low; work could potentially impact breeding habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Cypseloides niger	Black swift	SSC	Nests on ledges or in crevices in steep cliffs along coast or near streams or waterfalls in mountains	May occur. One occurrence within three miles of Project (CNDDB 2024). Aerial forager, no suitable breeding habitat.	None; work would not occur in suitable habitat. I.
Elanus leucurus	White-tailed kite	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands,	May occur. Frequently and recently observed throughout area surrounding the Project (eBird 2024). Nests in trees of variable species, generally 3 m – 50 m tall, January through August. Suitable nesting habitat present in Project area, suitable	Low; work could potentially impact breeding habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching	foraging habitat present nearby but not within Project bounds.	
Falco peregrinus anatum	American peregrine falcon	FD	Nests on cliff ledge or hollow of broken tree snag, also uses ledges of buildings or other structures	Known to occur. 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 of which nest in eucalyptus groves. Suitable breeding and foraging habitat present within Project area.	Low; work could potentially impact breeding and foraging habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Geothlypis trichas sinuosa	Saltmarsh common yellowthroat	SSC	Coastal riparian and wetland areas, Requires thick continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting	May occur. Twelve occurrences within 3 miles of Project (CNDDB 2024). Nests in dense understory. Suitable breeding and foraging habitat exists within Project area.	Low; work could potentially impact breeding and foraging habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Haliaeetus leucocephalus	Bald eagle	FD, CE, FP	Mountain and foothill forests, woodlands near waterbodies	Known to occur. Frequently and recently observed throughout the Project area (eBird 2024). Foraging habitat not present	Low; work could potentially impact breeding habitat). If work that has the potential to impact nesting birds commences during

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				within Project area. Suitable breeding habitat is present within Project area.	the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Ixobrychus exilis	Least bittern	SSC	Freshwater and brackish marshes with dense, tall growths of aquatic or semiaquatic vegetation (particularly Typha, Carex, Scirpus, Sagittaria, or Myriscus) interspersed with clumps of woody vegetation and open water. Occasionally in salt marshes and mangrove swamps	Not expected to occur. Most recent eBird occurrence is over 25 years old at Olema Marsh. No suitable breeding or foraging habitat within Project area.	None; work would not occur in suitable habitat and no recent occurrences.
Laterallus jamaicensis coturniculus	California black rail	CT, FP	Wetlands and marshes	Not expected to occur. Nine occurrences within 3 miles of Project (CNDDB 2024). No suitable breeding or foraging habitat within Project area.	None; work would not occur in suitable habitat.
Passerculus sandwichensis belding	Belding's savannah sparrow	CE	Coastal marshes	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Project is outside known	None; work would not occur in suitable habitat and is not within known species range.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				species range, no breeding or foraging habitat within Project area.	
Pelecanus occidentalis californicus	California brown pelican	FD, CD	Open sea, estuaries, and beaches	May occur. Frequently and recently observed near the Project area (eBird 2024). Suitable breeding and foraging habitat are not present within the Project area but may fly over incidentally.	None; work would not occur in suitable habitat.
Phoebrastria albatrus	Short-tailed albatross	FE	Breed on remote islands, live on the open ocean	Not expected to occur. No breeding or foraging habitat present, and no known occurrences or observations within 3 miles of Project area (CNDDB 2024).	None; work would not occur in suitable habitat.
Progene subis	Purple martin	SSC	Montane forest, lowland oak and riparian woodland, and were restricted to areas with dead snags containing woodpecker holes. Nests in tree cavities or manmade birdhouses	May occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). Suitable breeding habitat exists in Project area, aerial forager.	Low; work could potentially impact breeding habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIFs NB-1, NB-2).
Pterodroma sandwichensis	Hawaiian petrel	FE	Breed in burrows in montane locations	Not expected to occur. No known occurrences or	None; work would not occur in suitable habitat.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			on the Hawaiian Islands	observations within 3 miles of Project area (CNDDB 2024).	
Rallus obsoletus obsoletus	California Ridgway's rail	FE, CE, FP	Saltwater marshes, freshwater marshes, and mangrove swamps	Not expected to occur. Two occurrences within 3 miles of Project site (CNDDB 2024). Some potentially suitable habitat exists near Project area, but no suitable breeding or foraging habitat within Project area. No recent occurrences in eBird (eBird 2024).	None; work would not occur in suitable habitat.
Rynchops niger	Black skimmer	SSC	Coasts, shorelines, freshwater, and saltwater wetlands	Not expected to occur. Few occurrences in winter in Bolinas (eBird 2024). No suitable breeding or foraging habitat within Project area, may incidentally flyover.	None; work would not occur in suitable habitat.
Setophaga petechia	Yellow warbler	SSC	Bushes, swamp edges, streams, gardens. Nests places in upright fork of branches in shrubs, small trees, and briars	Known to occur. Frequently and recently observed in Bolinas (eBird 2024). Breeding and foraging habitat present in Project area.	Low; work could potentially impact breeding and foraging habitat. If work that has the potential to impact nesting birds commences during the nesting season, a qualified biologist will conduct a pre-activity survey for nesting birds (PDIF NB-1, NB-2).
Sternula antillarum browni	California least tern	FE, SE	Nest on beaches, mudflats, and sand dunes	Not expected to occur. One observation near Project site in Bolinas lagoon in 2016 (eBird 2024). No suitable breeding or	None; work would not occur in suitable habitat.

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				foraging habitat present within Project area.	
Invertebrates					
Bombus occidentalis	Western bumble bee	CC	Associated with a variety of flowering plants and crops within open coniferous, deciduous, and mixed woodland forests, wet and dry meadows. Is capable of foraging in cold, rainy weather conditions and commonly nests underground	May occur within 3 miles of Project (CNDDB 2024). Suitable habitat is present Project-wide wherever there are floral resources. Observation approximately 1 mile east of Olema in 1968 (CNDDB 2024).	Low; species and nesting habitat (e.g., burrows) would be included in environmental training to ensure avoidance (PDIF ET-1).
Danaus plexippus plexippus pop. 1	Monarch—California overwintering population	FC	Grassland, woodland	Known to occur. Thirteen occurrences within 3 miles of Project (CNDDB 2024). Overwintering habitat is present in eucalyptus groves in Project area. Observed in eucalyptus grove adjacent to Project.	Low; can disperse from other areas and would be included in environmental training to ensure avoidance (PDIF ET-1). Winter roost sites were not observed on the project site and would be avoided.
Mammals					
Corynorhinus townsendii	Townsend's big-eared bat	SSC	Caves, mines, bridges, building, rock crevices, tree hollows in coastal lowlands, and	May occur. Seven occurrences within 3 miles of Project (CNDDB 2024). Some potentially suitable habitat in the peeling	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). Bat

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			cultivated valleys; prefer roosting in caves or other similar open spaces	bark of eucalyptus trees in Bolinas (based on surveys).	identification and roosting avoidance would be included in the environmental training for crews (PDIF ET-1).
Lasiurus frantzii	Western red bat	SSC	Edge habitats; roosts in trees, generally in the open on in leaf litter in winter	May occur. One occurrence within 3 miles of Project (CNDDB 2024). Some potentially suitable habitat exists adjacent to the Project site in riparian zones. Most of the creeks have broad leaf deciduous riparian trees that could provide this species roost sites (based on surveys). The California Central Coast population does not migrate.	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). Bat identification and roosting avoidance would be included in the environmental training for crews (PDIF ET-1).
Reithrodontomys raviventris	Salt marsh harvest mouse	FE, CE, FP	Marshes and wetland edges	Not expected to occur. Project is outside of known species range.	None; work would not occur in suitable habitat.
Taxidea taxus	American badger	SSC	Dry open grasslands, scrubland, and forests	Not expected to occur. Two occurrences within three miles of Project (CNDDB 2024). Potentially suitable habitat includes the grasslands along State Route 1 between Pt. Reyes Station and Bolinas (based on surveys), but not within Project area.	Low; work would not occur in suitable habitat.
Reptiles and Amphibians					

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Chelonia mydas	Green sea turtle	FE	Marine	Not expected to occur. No known occurrences or observations within 3 miles of Project area (CNDDB 2024). No suitable habitat within Project bounds.	None; work would not occur in suitable habitat.
Rana draytonii	California red-legged frog	FT, SSC	Breeds in ponds/slow moving streams, may use grassland and oak woodland for dispersal and foraging	Known to occur. Eighty-four occurrences within 3 miles of Project (CNDDB 2024). Sequoia biologists observed specimen ~500 feet from the Project area.	Low; can disperse from other areas, and suitable breeding habitat would be avoided by project design. Species would be included in environmental training to ensure avoidance (PDIF ET-1).

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)

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment

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)

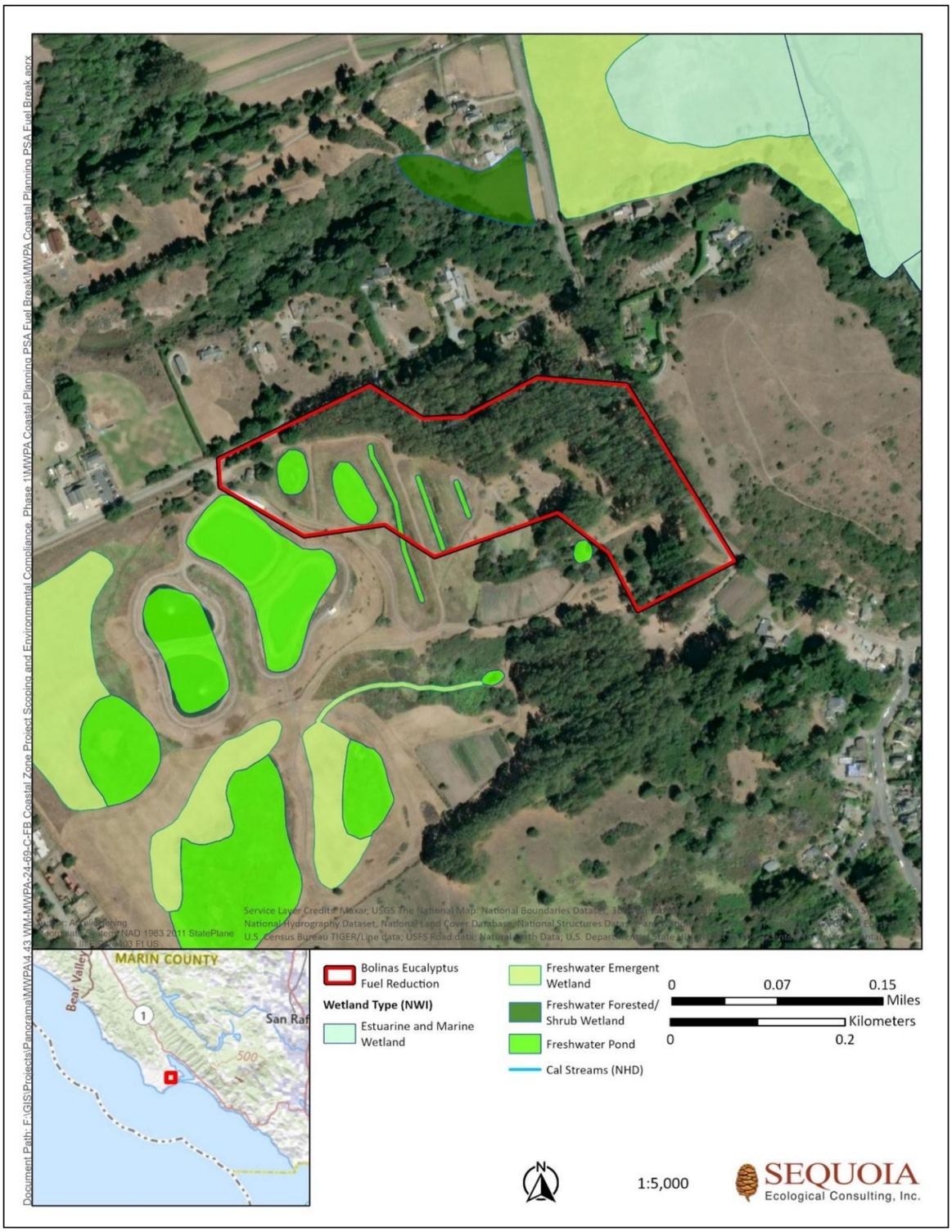
Potential for Occurrence Definitions

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.

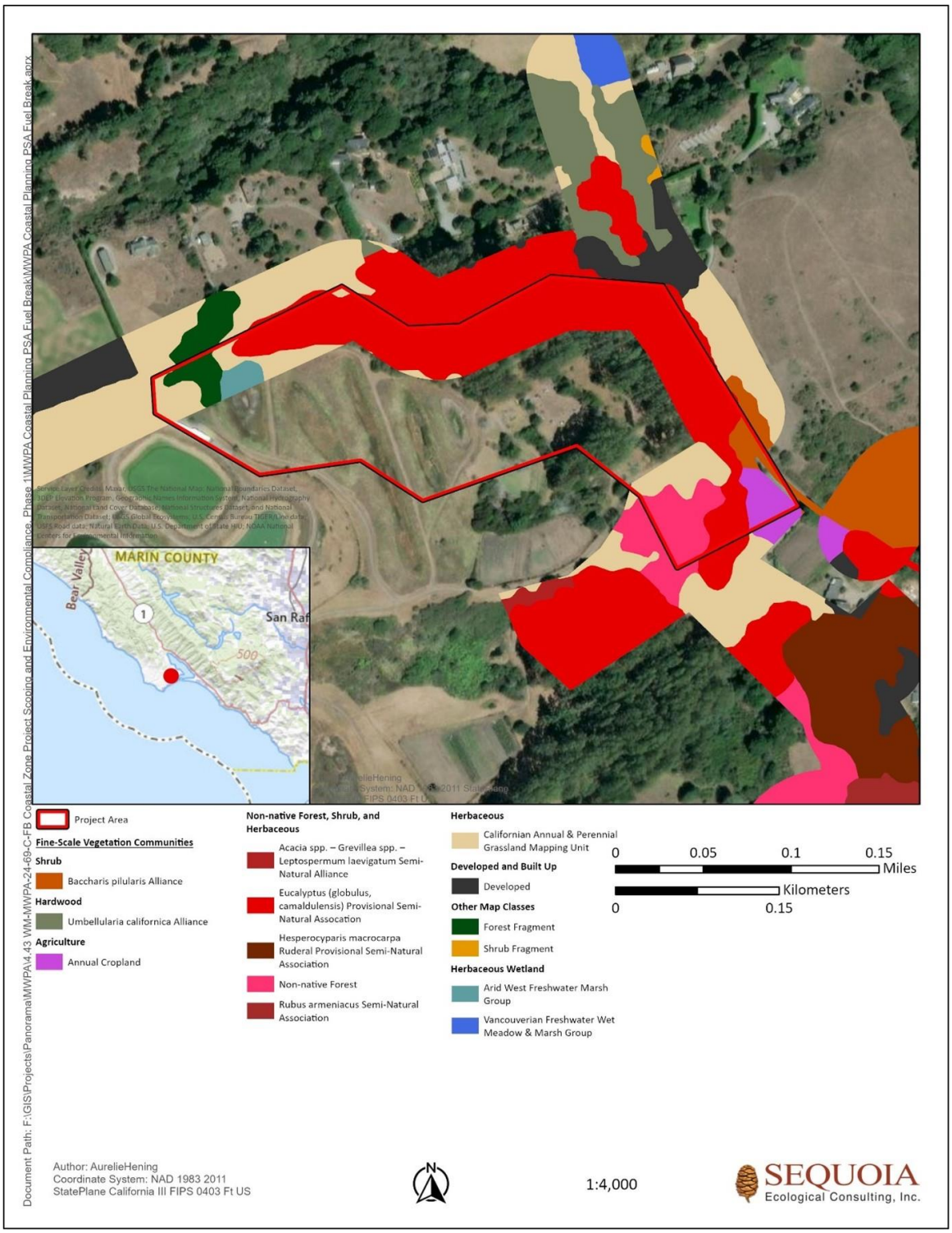
Known to occur: Species has been documented within the treatment site.

Figure 2 **Bolinas Eucalyptus Fuel Reduction Project boundaries with NWI water/riparian data overlaid**



Source: (USFWS 2024)

Figure 3 **Bolinas Eucalyptus Fuel Reduction Project boundaries with GGNPC habitat type data overlaid.**



Source: (GGNPC 2021)

Cultural Resources and Tribal Cultural Resources[51]

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

No documented cultural resources are known to occur on the project site (Osterlye and Gilleran 2024). Equipment and vehicles for fuel reduction activities would operate from the shoulders of existing roadways along a key evacuation route. No intense ground disturbing activities (e.g., discing) would occur nor would off-road equipment be used. The potential to disturb previously undiscovered cultural resources is low since the proposed project activities would result in little to no new ground disturbance. 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 proposed 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?	☒	☐
Potential for significant impact?	☐	☒

The vehicles for worker trips and equipment conducting the fuel reduction activities would consume energy, including gas, diesel, and motor oil. Vehicle engines and fuel used during implementation of the 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 and ingress/egress. Implementation of the proposed project activities would not cause a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Geology and Soils

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

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

Vehicle travel and operation of ground-based equipment along the evacuation route would occur on paved roads and within 500 feet of PG&E transmission lines, with majority of the work occurring within 50 feet of Mesa Road and Olema Bolinas Road.

Soil erosion and loss of topsoil could occur during manual and mechanical vegetation cutting and removal through the exposure of bare soils or ground disturbance from pulling large vegetation. After the vegetation treatments are 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 documented within the proposed project area. While some soil types present in work areas may be more prone to erosion than others, vegetation removal and cutting that maintain at least 70 percent of groundcover would not result in substantial erosion (Lang & McDonald, 2005). Erosion control devices would be installed (GEO-1) in areas where erosion could occur (e.g., steep slopes with apparent erosion). Significant impacts related to erosion and loss of topsoil would not occur.

Greenhouse Gas Emissions

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

Vegetation treatment would involve manual and mechanical vegetation removal and some individual hazard trees removal, within the fuel reduction zone. Use of vehicles for worker trips and debris disposal and equipment during these activities would generate some greenhouse gas (GHG) emissions, but not in significant quantities due to the limited duration and types of activities[52]. The treatment activities would primarily involve removal of dead and downed vegetation, which is no longer sequestering carbon and has begun to decay. The proposed project would also involve some understory thinning and would not remove any healthy, mature trees. Thinning can result in greater sequestration rates by reducing competition for the larger, more resilient trees (CAL FIRE, 2018). These processes are not quantified but would fluctuate during initial treatment and future maintenance. Due to the current higher fuel loads comprised of dense understory and jackpots of dead and downed vegetation, it is anticipated that a net release of carbon from removal of vegetation could occur from chipping activities accelerating decomposition, 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. 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?	☒	☐

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

Question	Yes	No
Potential for significant impact?	☐	☒

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

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 recreation areas (HAZ-4). Significant impacts related to hazards and hazardous materials would not occur.

Hydrology and Water Quality

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

Work areas would be mostly accessed using existing paved roads adjacent to the work areas. Two wetlands are present within the proposed project boundary. Due to the type of project and extent of the project activities, wetlands are not anticipated to be encountered and no activities would occur in wetlands. Training would ensure that workers avoid wetlands (ET-1). Any riparian areas that intersect with the proposed project roadways would be avoided. The vegetative material would be chipped or cut and either broadcast on site or hauled away from the work area. Trees would be pruned to a height of 10 feet. Removal of hazardous accumulated ground and ladder fuels 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). Hand pulling of invasive species would occur within the fuel reduction zone. However, no intense ground disturbance such as grading or off-road equipment use would occur. The proposed project 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 us in aquatic environments when using near aquatic habitats, such as ephemeral drainages. Significant water quality impacts would not occur.

Land Use and Planning

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

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

Mineral Resources

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

Project activities would not result in the loss of availability of a known mineral resource because the work would occur within 500 feet of PG&E transmission lines, with majority of the work occurring within 50 feet of Mesa Road and Olema Bolinas Road and would not permanently alter any features. Fuel reduction activities are intended to reduce wildfire risks to life, property, and critical infrastructure and would not alter land uses, access, or subsurface areas that could impact mineral resources.

Noise

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

The proposed project activities would occur weekdays from 7:00 am to 6:00 pm starting in August 2024 and lasting for 10 workdays. This timeframe would conform with the Marin County Noise Ordinance § 6.70.030(5)[53], which limits construction activities and other related work to Monday through Friday 7:00 am to 6:00 pm and Saturday from 9:00 am to 5:00 pm. Noise would be limited to a few hours per day. Measures to minimize noise disruption to nearby neighbors and sensitive receptors would be implemented, as needed (NOI-1). Exceedances of local noise standards would not occur (given the short duration of noise generation in any one location and existing noise levels) and significant noise impacts would not occur.

Population and Housing

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

The workers implementing the removal of hazardous accumulated ground and ladder fuels and some individual hazard trees, are anticipated to be sourced from the existing Marin County Fire Department crews with coordination by the Bolinas Fire Protection District. As such, this proposed project would not induce population growth. No impact related to population and housing would occur.

Public Services

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

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

Recreation

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

Project activities would be conducted within 500 feet of PG&E transmission lines, with the majority of the work occurring within 50 feet of Mesa Road and Olema Bolinas Road, and would not affect recreational facilities. Sidewalks alongside these roads are not anticipated to not be closed to the public during proposed project work. Indirect impacts on passing recreationalists

[53] While these activities are not construction and do not require a construction permit, some of the equipment generates noise levels similar to construction equipment (e.g., noise level of a chainsaw is ≤82 dBA L_{max} at 50 feet (USDOT, 2008) such that a comparison could be made and justification for ensuring work hours conform.

associated with the vegetation treatment are discussed in *Aesthetics* above. 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). The proposed project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

Transportation

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

The proposed project would require 6 to 10 crew members and one chipper operator in addition to one project manager and one project coordinator. The Bolinas Fire Protection District would contract a crew for fuel removal, utilizing hand tools and a chipper. Daily one-way vehicle trips would range from 20 to 28 (2 average trips per day per worker and 2 trips associated with haul trucks), which would not exceed screening threshold of 110 trips per day[54]. The VMT associated with implementation of the proposed project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b). No significant traffic impacts would occur.

The vegetation treatments would utilize road shoulders. This would allow an adequate buffer from passing vehicles. Notification or emergency response agencies and traffic control measures would be implemented including compliance with the latest Manual on Uniform Traffic Control Devices (MUTCD) (TR-1 and TR-2). The MUTCD requires crews to wear safety equipment, such as high-visibility vests, when operating vehicles or equipment near public roads and use of flaggers and signage. No significant traffic impacts would occur

Utilities and Service Systems

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

Biomass generated from vegetation removal activities would 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 hauled to the nearby Bolinas Resource Recovery Site for disposal which has a permitted capacity of 120 cubic yards per day, or other processing facility, and would be able to accept the chipped material (CalRecycle 2024). Any waste generated by the workers, such as spent vehicle batteries or refuse would be properly disposed of at an appropriate facility. No impact related to utilities and service systems would occur.

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

Wildfire

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

The fuel reduction zone is within the State Responsibility Area (SRA) and is identified as a high fire hazard severity zone (CAL FIRE 2024a; 2024b) 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 impact an adopted emergency response plan or evacuation plan. The proposed project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The proposed project does not involve intense ground disturbing activities that could result in downslope or downstream flooding or landslides should a wildfire occur. Impacts to people and structures from increased fire risk would not occur.

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