



NOTICE OF EXEMPTION

Marin County Parks and Open Space District
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FILED

09/10/2024

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MARIN COUNTY CLERK
By J. Cruz, Deputy
21 - 2024 - 162

Marin County Clerk
3501 Civic Center Drive, Suite 234
San Rafael, CA 94903

Date: September 09, 2024

Project Title: FIRE FUEL REDUCTION AND FOREST HEALTH PROJECT

Project Location: Gary Giacomini Open Space Preserve in Unincorporated Marin County, California

Assessor's Parcels: 169-291-01; 169-301-01; 169-331-12 & -17; 170-120-31 & -37, 170-130-32, 197-110-08

Description of Nature, Purpose, and Beneficiaries of the Project: The Marin County Open Space District (MCOSD) is proposing to implement a fire fuel reduction and forest health project within the Gary Giacomini Open Space Preserve. The proposed project would be conducted in coordination with Marin County Fire (MCF), the Golden Gate National Parks Conservancy (GGNPC), and the One Tam partnership, including adjacent land managing agency Marin Municipal Water District (MMWD), with partial funding provided by a grant from the California Department of Forestry and Fire Protection (CAL FIRE). The purpose of the proposed project is to increase forest health and resiliency, enhance biodiversity, improve ecosystem function, and protect residential communities. The proposed project would be accomplished by reducing fuels along Manzanita Fire Road, East Sylvestris Fire Road, White Hill Fire Road, and the western portion of San Geronimo Ridge Fire Road where fuels pose a threat to biodiversity and ecosystem function as well as where they could impact access and firefighter safety during a wildfire response. Implementation of the proposed project would remove ladder fuels in areas of forest and woodland which should increase firefighter access and safety, help protect mature trees, and reduce risk within the adjacent residential community during a wildfire. All work would focus on maintaining firefighter access and safety, preserving rare grasslands and shrublands, and managing forested stands for improved health, and would include invasive species management where applicable.

The proposed project includes implementation of BMPs to avoid potential impacts to nesting birds, roosting bats, and active woodrat nests; define protocol when working in sensitive areas; to avoid ground disturbance and prevent an increase in invasive species; to prohibit work during Red Flag Days; and to address refueling and sanitation of tools. Implementation of the proposed project would not affect vegetation rooted below the top of bank of seasonal drainages. Implementation of the BMPs would limit work in these areas to when the seasonal drainages are dry and would avoid potential impact to nesting birds, roosting bats, and active woodrat nests. The proposed project has been designed to not only avoid potential impact to sensitive plant species but to protect them and restore their habitat. For these reasons, no regulatory permit authorizations would be required to implement the proposed project except for compliance with the Bay Area Air Quality Management District (BAAQMD) Regulation 5 for open burning and burn day restrictions.

Project Area. Proposed project areas were selected based on several factors, including proximity to private habitable structures, vegetation composition and condition, ignition probability, spatial risk data provided by the County-Level and Parcel-Level Fire Hazard Assessments, coordination with local fire agencies, and the potential to achieve multiple benefits of increased community wildfire readiness and forest ecosystem resiliency.

The proposed project is comprised of areas within 150 feet of San Geronimo Ridge Fire Road along a 2.2-mile section of ridgeline, in addition to areas within 100 feet of Manzanita Fire Road and East Sylvestris Fire Road, two arterial fire roads that extend from the residential community up to the ridgeline. Additionally, a 0.28 mile segment along White Hill Fire Road is proposed for prescribed fire in conjunction with a burn that is proposed for adjacent lands.

One area of native shrubland extends 900 feet from the Manzanita Fire Road that includes Mt. Tamalpais Manzanita shrubland, a rare plant community, surrounded by early-successional douglas fir forest. Data from the Forest Health Strategy suggests the forested areas are departed from desired forest conditions because they consist of young trees that indicate a recently invaded and/or transitioned area. Due to their proximity to the area of shrubland and rare plants, these forested areas may have a dead or dying understory of rare manzanita that were recently overtopped by douglas fir trees. Seed bank and habitat for Mt. Tamalpais manzanita are likely present in these developing forest areas at the shrubland edge. As part of the proposed project, young douglas fir trees in the shrubland and around its borders would be removed to protect and restore the diminishing rare plant shrubland community. In total, the proposed project would be approximately 114 acres in size. The minimum distance from residences would be 80 feet and the maximum distance from residences would be 4,000 feet.

Project Area Setting. Approximately 90 percent of the proposed project area is forested, over half of which is douglas fir forest (64 acres) and a quarter is redwood forest (26 acres), with a smaller component of California bay forest (6 acres). Manzanita shrublands make up most of the remaining 10 percent with remaining vegetation types at one percent or less, including coast live oak woodlands, grasslands, and scrublands comprised of coyotebrush, chemise, or live oak species.

Sensitive natural communities and rare plants are known to occur within the proposed project. Known vegetation types within the project area include the following, listed in order of highest to lowest relative percentage: Douglas fir - tanoak forest and woodland, Redwood forest and woodland, California bay forest and woodland, Eastwood manzanita chaparral, Mt. Tamalpais manzanita chaparral, Californian Annual & Perennial Grassland, Coast live oak woodland and forest, Coyote brush scrub, Chamise chaparral, Bishop pine - Monterey pine forest and woodland, and Canyon live oak - Interior live oak chaparral. Rare plants mapped within the project area include the following perennial herbs and bulbs: California bottlebrush grass (*Elymus californicus*), Oakland star tulip (*Calochortus umbellatus*), Mt. Tamalpais thistle (*Cirsium hydrophilum* var. *vaseyi*), rayless arnica (*Arnica discoidea*), serpentine monardella (*Monardella purpurea*), and serpentine reed grass (*Calamagrostis ophitidis*); annuals: Calistoga navarretia (*Navarretia heterodoxa*), Mt. Tamalpais lessingia (*Lessingia micradenia* var. *micradenia*), and Tiburon buckwheat (*Eriogonum luteolum* var. *caninum*); and shrubs including Marin manzanita (*Arctostaphylos virgata*) and Mt. Tamalpais manzanita (*Arctostaphylos montana* ssp. *montana*).

Seasonal drainages cross through the project areas that occur along Sylvestris Fire Road and Hunt Camp Fire Road. Implementation of the proposed project would not affect vegetation rooted below the top of bank of these features. Implementation of the proposed project would occur when the seasonal drainages are dry.

Project Description. The proposed project would focus on managing woody material. In forested areas, hand work would thin small conifer trees growing at high densities greater than those typical of a mature forest, and would reduce dead debris to low density wherever it is moderate to high density or wherever it creates ladder fuels that could threaten the survival of mature trees during a wildfire. In areas within 50 feet of the fire road where firefighter access and safety are high priority, additional understory trees and shrubs, lower limbs, and debris would be removed. All canopy trees would be retained to achieve shaded, reduced-fuel conditions that might occur under a natural fire regime; larger woody material (>8" diameter) with lower risk and higher habitat value would be left on site. Individuals or patches of native shrubs and trees would be retained to preserve a diversity of tree age classes and provide understory habitat. No healthy, mature, scenic trees would be removed as part of the proposed project.

Shrubland conservation areas occur along Manzanita Fire Road and East Sylvestris Fire Road. In shrubland conservation areas, invading conifer trees would be removed; within 50 feet of the fire road, dead debris would be removed from the shrubland. Invasive French broom occurs at the bottom of Manzanita Fire Road and East Sylvestris Fire Road and would be removed wherever it occurs.

A 10-acre area of douglas fir forest along White Hill Fire Road has been identified by local fire officials as an area where a prescribed burn may be conducted in conjunction with other manual and mechanical methods to achieve fuels and ecological objectives by reintroducing low-intensity fire that would more-closely approximate the effects and benefits of natural fire. This area was previously treated with hand work that has helped prepare the area for the use of prescribed fire; additional hand work to prepare understory fuels for a successful burn may be conducted as part of the proposed project.

Initial implementation of the proposed project would begin in September 2024 with a goal of completion by March 2030 with the restrictions identified in the Best Management Practices (BMPs) included in this document.

The proposed project would be implemented by the Marin County Fire Department's Tam Crew (Tam Crew) or Foundry Crew or similar forestry crew which would consist of 6-14 workers at a single location. Up to four crews may be working at the same time. All work would be performed weekdays between 8:00 am and 5:00 pm. Treatment areas would be accessed from existing fire roads and trails to the maximum extent feasible. Vehicles and equipment would be staged at the contractor's yard or on MCOSD owned property. Equipment may include chainsaws and fuel, masticators, loppers, pole pruners, and other similar handheld tools; for prescribed fire treatments, additional equipment may include water tanks, hoses, drip torches, and digging tools. A trailer-mounted chipper would be operated from nearby roads and fire roads. No new roads would be created as part of the proposed project.

Disposal of Plant Material. Plant material removed during the proposed project would be disposed of through chipping and hauling, chipping and broadcasting, or pile burning depending upon the location and condition of the work area. Material may be broadcast onsite or off-hauled for disposal at the Marin Resource Recovery Center. Material spread on site would be chipped to under 3 inches and would be applied to a maximum of 2 to 4 inches in depth to minimize wildfire risk, maximize contact with the soil and associated decomposition, and to allow for natural regrowth of herbaceous plants. Chips would not be spread in ecologically sensitive areas. In areas more than 150 feet from homes, material may be left in place to decompose if removing it would be infeasible or would harm the surrounding area.

Suitable areas for burn piles are typically flat or have gentle slopes and have open areas away from tree canopies and power lines. Areas selected for pile burning would be away from waterways and sensitive species habitat. Piles would generally be 4 feet in diameter and 4 feet in height but may vary. Multiple piles may be burned on a single day. Pile burning would be conducted in compliance with Bay Area Air Quality Management District (BAAQMD) Regulation 5 for open burning and burn day restrictions.

Post Project Monitoring and Treatment. The condition of the fuel reduction zone after treatment would be monitored annually by MCOSD and/or fire department staff to evaluate if maintenance is needed. Subsequent treatments are anticipated to be the same as the proposed activities but are subject to change depending on the condition of the fuel reduction zone and response to initial treatment. Some resprouting invasive species may be treated with an approved herbicide, to be determined by MCOSD vegetation and fire ecology staff. The method of cutting followed by herbicide treatment has had the best success rate for control of certain invasive species. Should chemical treatments be applied as part of follow-up treatment, herbicide application would be implemented according to all applicable regulations and only under the recommendation of a certified Pest Control Advisor and would implement the BMP described in this document.

Best Management Practices. MCOSD would implement applicable Best Management Practices (BMPs) from MCOSD's Vegetation and Biodiversity Management Plan (VBMP), which set standards for natural resource protection and recreation management, MCOSD's Bat Roosting Survey Guide, and other BMPs identified for the proposed project. Specific BMPs that would be implemented as part of the proposed project include the following:

- To the greatest extent possible, project implementation would be planned and conducted outside bird-nesting season defined as March 1 - July 31. If work needs to occur during bird-nesting season, a qualified biologist would conduct a nesting bird survey and work would not proceed within the buffer until a resurvey determines that young have fledged.
- Implementation of the proposed project would be delayed or avoided within prescribed buffers surrounding active bird nests, bat roosts, and/or active woodrat nests. Portions of the proposed project occur within 0.25 miles of known or potential Northern spotted owl nesting habitat; in these areas, all mechanical work would be conducted outside of nesting season and would avoid any active wood rat nests identified in pre-project surveys.
- Prescribed burns and mechanical treatments would not be conducted during the bird-nesting season defined as March 1 - July 31.
- No ground disturbance would occur in sensitive areas. Work would be conducted in fall after most rare species have set seed. Pre-work surveys would identify and mark sensitive areas and species. Worker awareness training would be conducted to share information regarding sensitive species and communities, avoidance areas, and best practices to avoid impacts to environmentally sensitive resources.
- Implementation of the proposed project would occur when the seasonal drainages are dry.
- Work would not be performed on Red Flag days.

- No healthy, mature, scenic trees would be removed as part of the proposed project.
- No refueling of gas-powered tools would occur within sensitive areas.
- All tools, equipment, and clothing would be clean and free of dirt and vegetative material, including seeds; no soil should be moved on or off the project site on equipment, tools, or boots, and tools should be treated with a 10 percent bleach solution before and after working to reduce the spread of pathogens.
- Should chemical treatments be applied as part of follow-up treatment, herbicide application would be implemented according to all applicable regulations and only under the recommendation of a certified Pest Control Advisor and according to CA Department of Pesticide Regulations including: no application within 24 hours of a known rain event, all applicators would be supervised directly or individually hold a Qualified Applicators Certificate or license, a "Notice of Herbicide Application" and accompanying map would be posted four days in advance of the application at all main entry points to the treatment area and would remain posted on-site for four days following application.

Public Agency Approving Project: Marin County Parks and Open Space District

Name of Person or Agency Carrying Out the Project: Max Korten, Director and General Manager

Reasons for Exemption: The MCOSD has reviewed the project along with its environmental setting and has determined it to be categorically exempt from the California Environmental Quality Act under the following sections of the California Administrative Code:

Section 15301: Existing Facilities. The proposed project consists of the maintenance and minor alteration of an existing public facility involving no expansion of existing or former use. Implementation of the proposed project would improve public safety by implementing fire fuel management activities to reduce the volume of flammable vegetation to improve residential evacuation safety, provide alternate means of ingress for firefighting resources, reduce wildfire potential along fire roads, and the removal of invasive species from within natural habitats in the project area to protect and restore habitat for rare plant species.

Section 15304: Minor Alterations to Land. The proposed project consists of minor public alterations in the condition of land and vegetation by implementing fire fuel management activities to reduce the volume of flammable vegetation to improve residential evacuation safety, provide alternate means of ingress for firefighting resources, and reduce wildfire potential. No healthy, mature, scenic trees would be removed. This applies to the project area within 100 feet of residences.

Applicable to Both Exemption Classes.

No endangered, rare, or threatened plant or wildlife species would be impacted because BMPs would be implemented to ensure that nesting birds, bats, and woodrats are not impacted and to reduce the spread of sudden oak death consistent with the MCOSD's Road and Trail Management Plan, Vegetation Biodiversity Management Plan, Bat Roosting Survey Guide, and other BMPs identified for the proposed project. All mechanical work would be conducted outside of nesting season and would avoid any roosting bats and/or active wood rat nests identified in pre-project implementation surveys.

Implementation of the proposed project would not result in significant erosion or sedimentation into surface waters because vegetation rooted below the top of bank of seasonal drainages would not be affected and work would occur when the seasonal drainages are dry.

Implementation of the proposed project would not affect historical buildings or other historical resources. Should any cultural resources be discovered during project implementation, the applicable BMPs included in the MCOSD's Road and Trail Management Plan would be implemented including work stoppage until the Federated Indians of Graton Rancheria (FIGR) have been contacted, the resource evaluated, and appropriate action taken regarding the resource in consultation with FIGR.

The project area is not located on a hazardous waste site pursuant to Government Code Section 65962.5 and there are no designated California State Scenic Highways within the vicinity of the project area.

Similar fire fuel reduction activities have occurred within the project vicinity in the past and are expected to continue to maintain defensible space and safe emergency vehicle access and residential evacuation routes. Areas along White Hill Fire Road and San Geronimo Ridge Fire Road have been pruned annually to maintain

vehicle access along critical fire roads. Similar project work and ongoing maintenance activities have been completed and/or are planned along San Geronimo Ridge Fire Road on parcels south of the road within property not owned by MCOSD. Ongoing maintenance of the fuel reduction zones would be limited to the types of activities described in this document, which would be performed periodically to create reduced fuel zones adjacent to fire roads and within defensible space within open space adjacent to structures. When considered together, fire fuel management activities provide a beneficial effect to the project area in terms of public safety, reducing the amount of flammable vegetation in the project area, and protecting healthy native trees by minimizing the fire fuel ladder. For these reasons, implementation of the proposed project would not result in cumulative impacts or a significant effect to the environment due to unusual circumstances.

Lead Agency Contact Person:

Michelle Julene

Michelle Julene, Regulatory Open Space Planner

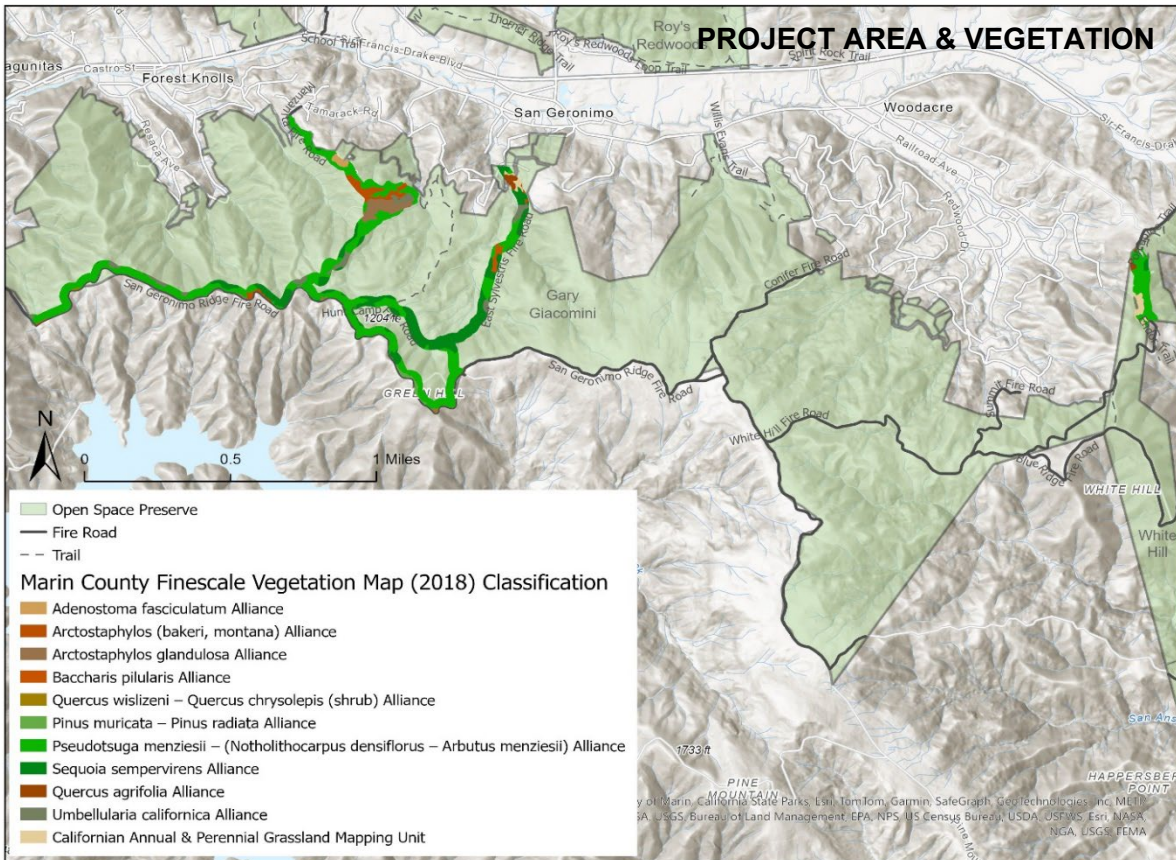
Marin County Parks and Open Space District

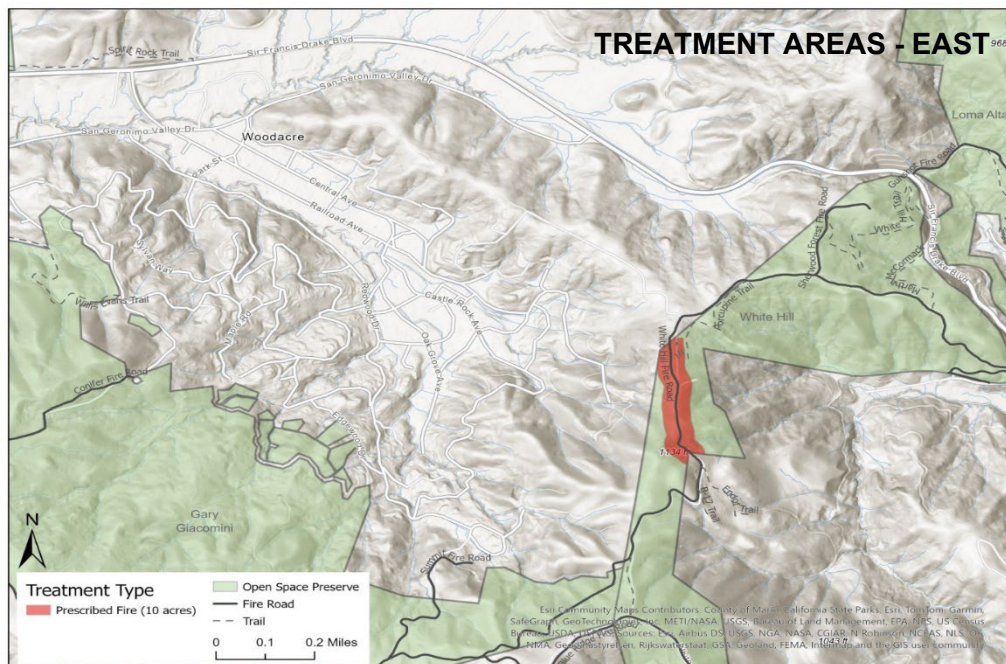
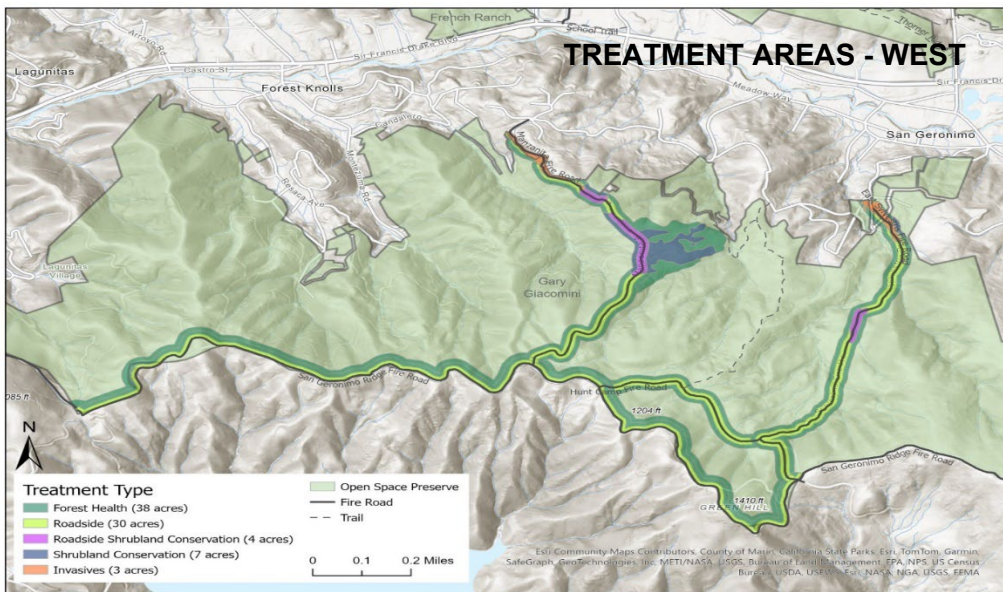
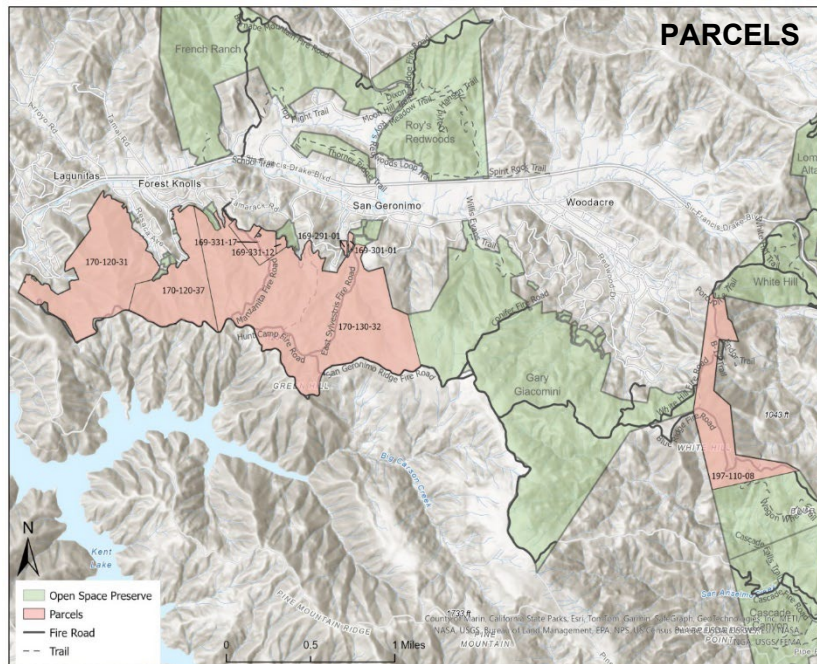
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NOTICE OF EXEMPTION – LOCATION MAP
GARY GIACOMINI FIRE FUEL REDUCTION AND FOREST HEALTH PROJECT
 September 09, 2024





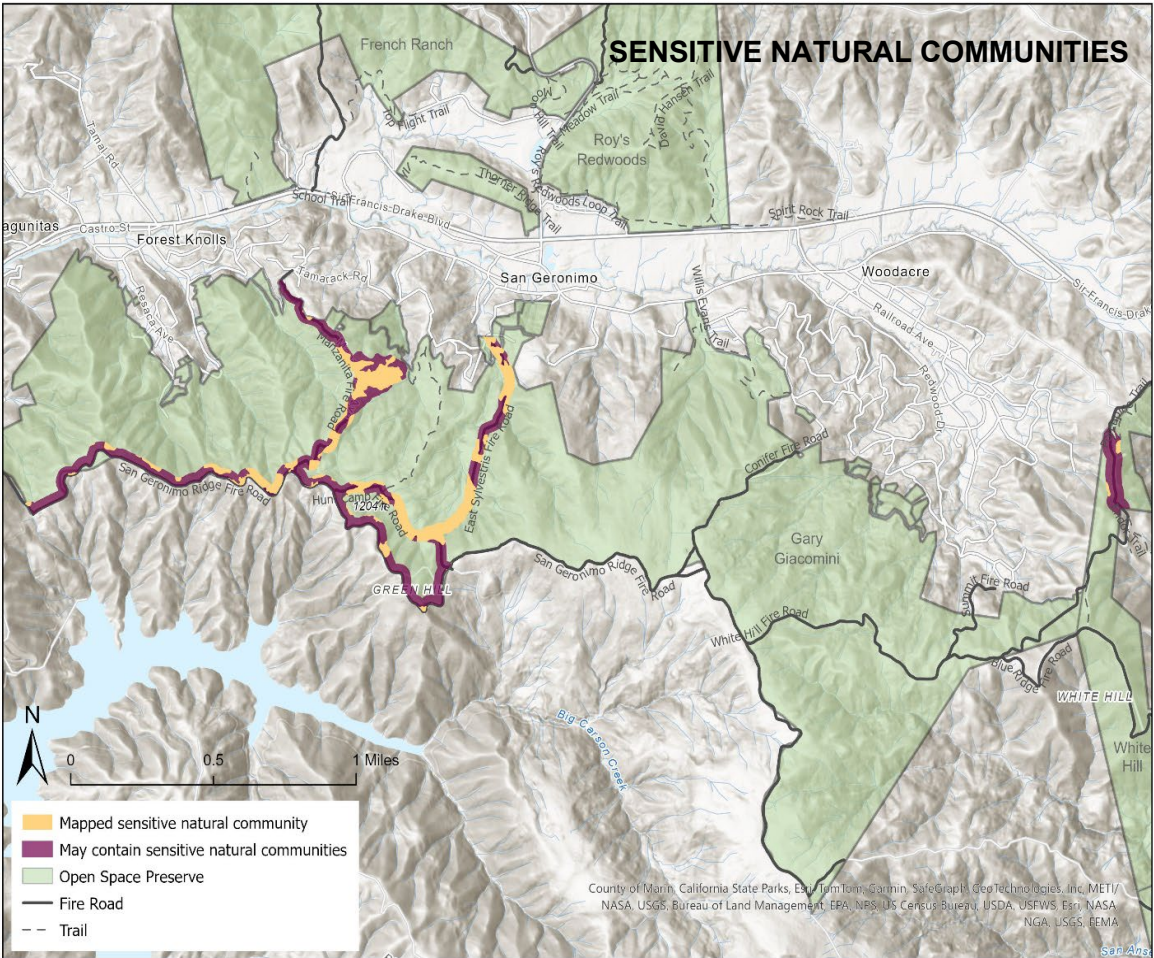
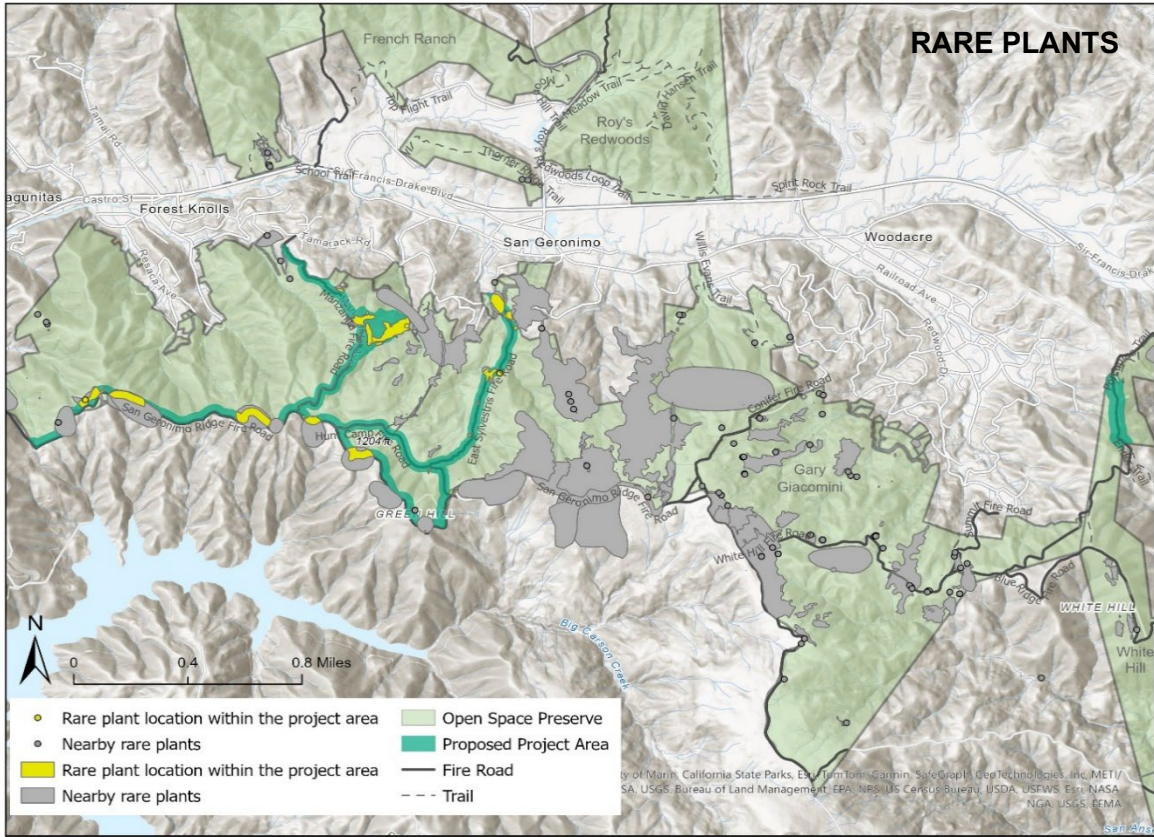


TABLE 1: RARE PLANTS MAPPED WITHIN THE PROJECT AREA.

PERENNIAL HERBS & BULBS	Common Name	California Rare Plant Rank (CRPR)
<i>Arnica discoidea</i>	Rayless arnica	Not listed - locally uncommon
<i>Calamagrostic ophitidis</i>	Serpentine reed grass	4.3
<i>Calochortus umbellatus</i>	Oakland star tulip	4.2
<i>Cirsium hydrophilum</i> var. <i>vaseyi</i>	Mt. Tamalpais thistle	1B.2
<i>Elymus californicus</i>	California bottlebrush grass	4.3
<i>Monardella purpurea</i>	Serpentine monardella	Not listed - locally uncommon
ANNUALS		
<i>Eriogonum luteolum</i> var. <i>caninum</i>	Tiburon buckwheat	1B.2
<i>Lessingia micradenia</i> var. <i>micradenia</i>	Mt. Tamalpais lessingia	1B.2
<i>Navarretia heterodoxa</i>	Calistoga navarretia	Not listed - locally uncommon
SHRUBS		
<i>Arctostaphylos montana</i> ssp. <i>montana</i>	Mt. Tamalpais manzanita	1B.3
<i>Arctostaphylos virgata</i>	Marin manzanita	1B.2

TABLE 2: MAPPED VEGETATION TYPES WITHIN THE PROJECT AREA. Natural community conservation ranks are given according to the state Heritage Program methodology per NatureServe. Global (G) and State (S) rarity ranks are indicated for Alliances and some Associations. Numeric ranks range from 1 (Critically Imperiled) to 5 (Secure). Ranks of 1-3 are considered sensitive. A “?” indicates our best estimate of the rank when we know we have insufficient samples over the full expected range of the type, but existing information points to this rank. Gray highlighted rows are sensitive at the mapped level; other vegetation types require further field assessment to the level of association and/or mapping at a finer scale before presence/absence of sensitive natural communities can be determined.

% of project	Acres in project	Mapped Vegetation Type	Common name	Type	Conservation Rank at Mapped Level	Notes
57%	63.9	Pseudotsuga menziesii – (Notholithocarpus densiflorus – Arbutus menziesii) Alliance	Douglas fir - tanoak forest and woodland	Forest	G5/S4	Associations with chinquapin-tanoak are G3/S3; association with coast live oak is G3/S3?; association with canyon live oak is G3?/S3?; associations with madrone, tanoak-huckleberry, tanoak-bay/poison oak, or hazelnut/swordfern are not ranked but considered sensitive.
23%	25.8	Sequoia sempervirens Alliance	Redwood forest and woodland	Forest	G3/S3	Some Marin associations are G2/S2?
5%	5.7	Umbellularia californica Alliance	California bay forest and woodland	Forest	G4/S3	Pure or tanoak associations are G3/S3; associations with coast live oak/poison oak, interior live oak, or swordfern are not ranked but considered sensitive.

% of project	Acres in project	Mapped Vegetation Type	Common name	Type	Conservation Rank at Mapped Level	Notes
5%	5.1	Arctostaphylos glandulosa Alliance	Eastwood manzanita chaparral	Chaparral	G4/S3	Pure association is G3G4 and considered sensitive; association with chemise-interior live oak is G3/S3?
4%	4.7	Arctostaphylos (bakeri, montana) Alliance	Mt. Tamalpais manzanita chaparral	Serpentine chaparral	G3/S3	Marin associations are G2/S2
2%	2.3	Californian Annual & Perennial Grassland Mapping Unit		Grassland	Not mapped to a ranked level of classification	Rare associations occur where native grasses or lupine-CA poppy occur in higher abundance. Note: Characteristic herbaceous species may not be dominant (e.g. 5% cover) but will meet a threshold that is higher than in non-native grass associations.
1%	1.4	Quercus agrifolia Alliance	Coast live oak woodland and forest	Forest	G5/S4	Associations with bay-madrone or with chamise-black sage are G3/S3; association with black oak is unranked but considered sensitive.
1%	1.2	Baccharis pilularis Alliance	Coyote brush scrub	Scrub	G5/S5	Associations with blueblossom Ceanothus, native grasses, native Carex-Juncus, or lizard tail are G2-G3/S1-S3
1%	1.0	Adenostoma fasciculatum Alliance	Chamise chaparral	Chaparral (some serpentine)	G5/S5	Association with Eastwood manzanita-Jepson ceanothus is not ranked but is considered sensitive.
1%	0.9	Pinus muricata – Pinus radiata Alliance	Bishop pine - Monterey pine forest and woodland	Forest	G3/S3.2 (not applicable in Marin; see notes)	Stands or individual <i>Pinus radiata</i> trees in Marin County are escaped ornamental or plantation stock and are not considered rare; these individuals or plantations are typically treated as invasive and not a natural component of the vegetation type that they have expanded into.
<1%	0.2	Quercus wislizeni – Quercus chrysolepis (shrub) Alliance	Canyon live oak - Interior live oak chaparral	Chaparral	G4/S3S4	Association with (Shreve's oak, interior live oak)-Eastwood manzanita is G3/S3?; pure Shreve's oak and coast live oak-canyon oak-Shreve's oak provisional associations are not ranked but considered sensitive.

GUIDELINE BUFFERS BY SPECIES OR GUILD

Species/Guild	Recommended Buffer meters/feet	Nesting Season
Diurnal Raptors (i.e.: Cooper's hawk)	76 meters (250 feet)	January 01 – July 31
Owls (except northern spotted owl)	50 meters (160 feet)	January 01 – July 31
Northern Spotted Owl	402 meters (1,320 feet or ¼ mile)	February 01- July 31
Double-crested Cormorant	50 meters (160 feet)	March 01 – October 31
Herons/Egrets/Bitterns	100 meters (330 feet)	January 01 – September 30
Waterfowl (Ducks/Geese/Swans)	30 meters (100 feet)	March 01 – July 31
California Black Rail	213 meters (700 feet)	February 01 – August 31
Ridgway's Rail	213 meters (700 feet)	February 01 – August 31
Larger Passerines: Corvids (crows, jays), Thrushes	20 meters (65 feet)	March 01 – July 31
Most Songbirds	10 meters (30 feet)	March 01 – July 31
Hummingbirds	10 meters (30 feet)	January 01 – July 31
Woodpeckers	15 meters (50 feet)	March 01 – July 31
Band-tailed Pigeon (BTPI)	30 meters (100 feet)	March 01 – July 31
Pigeons/Doves (except BTPI)	20 meters (65 feet)	March 01 – July 31
Species of Special Concern (olive-sided flycatcher, grasshopper sparrow, San Pablo song sparrow)	22 meters (75 feet)	March 01 – July 31
Blackbirds (tri-colored and red-winged)	30 meters (100 feet)	March 01 – July 31
Turdidae (robins, thrushes)	20 meters (65 feet)	March 01 – July 31
Killdeer	22 meters (75 feet)	March 01 – July 31