

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):
Novato Fire Protection District
95 Rowland Way
Novato, CA 94945

Project Title: Novato Evacuation Route Expansion Project

Project Applicant: Novato Fire Protection District

Project Location – Specific: Vegetation treatment and herbicide application along evacuation routes within the Novato Zone

Project Location – City:
City of Novato

Project Location – County:
Marin County

Description of Nature, Purpose and Beneficiaries of Project:

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

Name of Public Agency Approving Project: Novato Fire Protection District

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

Exempt Status (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Common Sense Exemption (Sec. 15061(b)(3));
- Categorical Exemption. State type and section number: 15304(i). Minor alterations to land for fuel management activities. 15301. Existing Facilities maintenance and minor alterations for vegetation removal along roadways.
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

The project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 for Minor Alterations to Land and 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 proposed project would involve new vegetation treatment along approximately 229 miles of roadways throughout the Novato Zone. Additionally, the proposed project would incorporate herbicide application as a potential treatment method for invasive and non-native plant species for the existing and approved evacuation route project within the Novato Zone mentioned above and the proposed project. The application of herbicides would assist in vegetation treatment activities where other treatment methods (e.g., mechanical) are not well-suited or inefficient. The scope of the proposed project shown in Figure 1 is consistent with minor alteration to the condition of the vegetation along the routes and maintenance of the existing roadways.

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

Lead Agency Contact Person:

Area Code/Telephone/Extension:

Lynne Osgood

415.878.2693

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: Lynne Osgood Date: 7/9/25 Title: Fire Marshal

Signed by Lead Agency

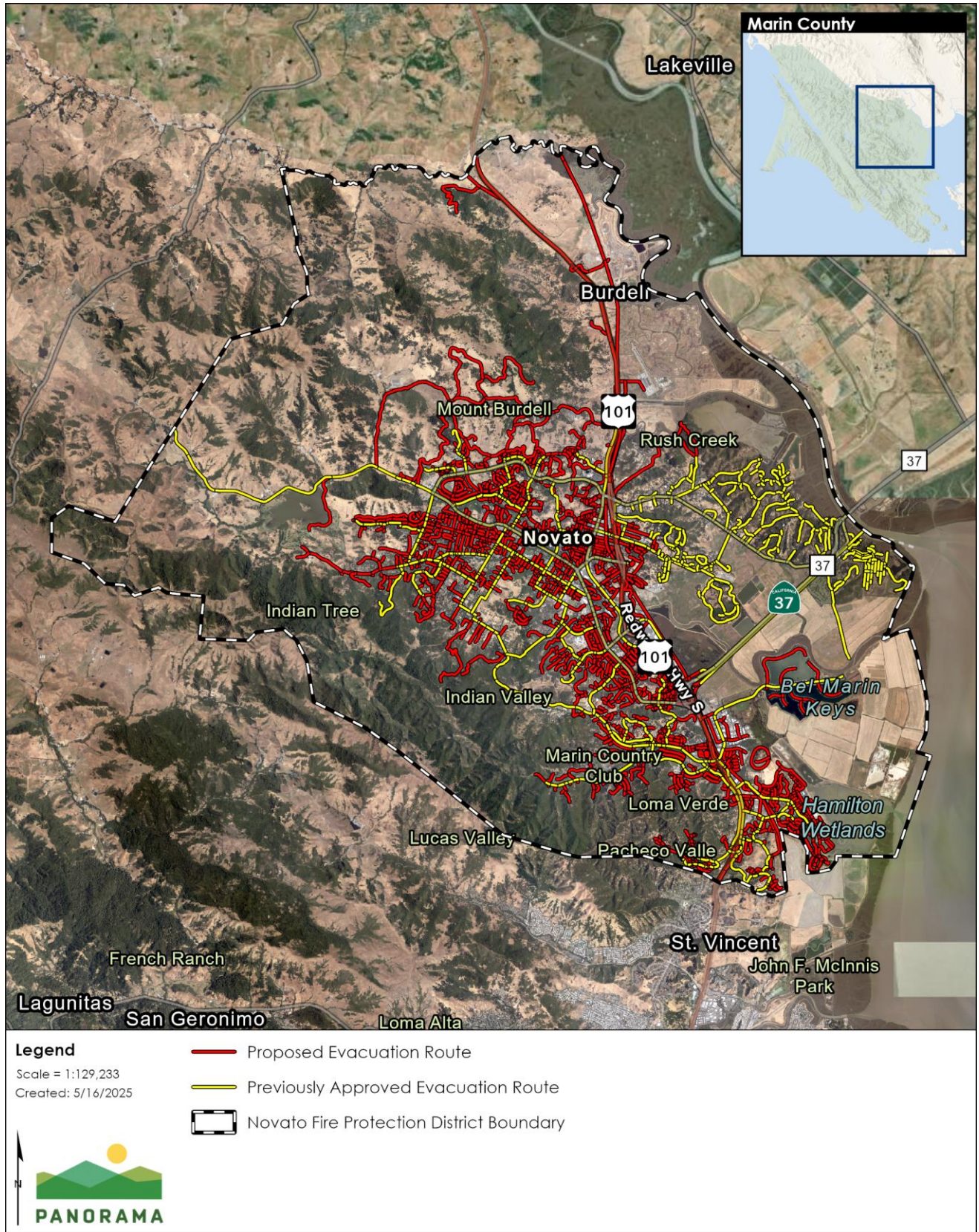
Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.

Date Received for filing at OPR:

Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Figure 1 Novato Evacuation Route Expansion Project



Date: June 26, 2025

Project: Novato Evacuation Route Expansion Project

Categorical Exemption Summary

The Novato Fire Protection District as the lead agency under California Environmental Quality Act (CEQA) has determined that the Novato Evacuation Route Expansion Project (proposed project) is categorically exempt under CEQA Guidelines Section 15304, Class 4 for Minor Alterations to Land and Class 1, for Existing Facilities. A Class 4 exempt project consists of minor public or private alterations in the 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) as the responsible agency under CEQA concurs with the Novato Fire Protection District's determination that the proposed project is exempt under CEQA.

The proposed project would involve vegetation thinning and removal within typically 10 feet, but up to 100 feet of the edge of roadways identified as key routes used for evacuation and ingress/egress within the Novato Zone. A Notice of Exemption (NOE) was filed for the Novato Zone Roadside Evacuation Routes Project in November 2021, which approved the treatment of approximately 64 miles of roads prioritized for roadside vegetation management. The Black Point Evacuation Routes Project NOE approved the treatment of approximately 11 miles of evacuation routes. In February 2022, the Novato Fire Protection District prepared a memorandum to file for the Novato Zone Black Point Evacuation Routes Project to incorporate additional roads and subsequently incorporated additional roadways for treatment. A Notice of Exemption was filed in July 2023 for the Novato Zone Northeast Novato Evacuation Route Project that approved the treatment of 35.7 miles of roadways, and extended the potential treatment area for all approved and proposed roadways out to 100 feet from the road edge.

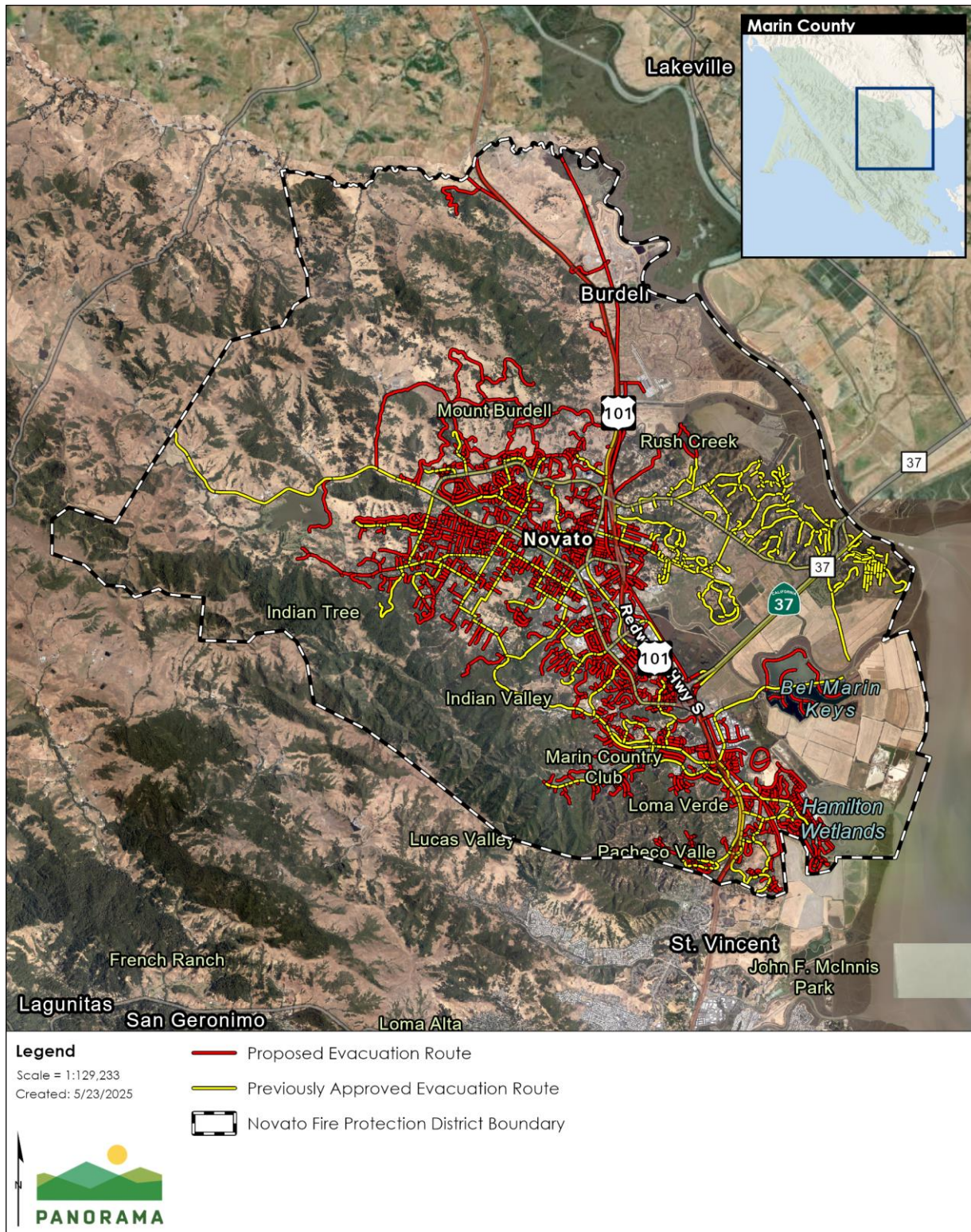
The proposed project would involve new vegetation treatment along approximately 229 miles of roadways throughout the Novato Zone. Additionally, the proposed project would incorporate herbicide application as a potential treatment method for invasive and non-native plant species for the existing and approved evacuation route projects within the Novato Zone mentioned above and the proposed project. The targeted application of herbicides would assist in vegetation treatment activities where other treatment methods (e.g., mechanical) are not well-suited or inefficient. The scope of the proposed project shown in Figure 1 is consistent with minor alteration to the condition of the vegetation along the evacuation routes and maintenance of the existing roadways.

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Figure 1 Proposed Project



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

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

Background

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

Purpose and Need

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

Project Description

Treatment Area

The proposed project activities would be completed along roads that could serve as evacuation routes within the Novato Zone, as shown in Figure 1. The proposed project would add 229 miles of roads for vegetation treatment and permit the targeted use of herbicides along the newly proposed routes and 113 miles of previously approved roadways. Treatment activities would typically involve vegetation removal and mowing within 10 feet of the road edge, but in rare instances, up to 100 feet if adjacent to structures or where topographical conditions or vegetation fuels necessitate greater treatment distances. Areas where fuel treatments may need to extend beyond 10 feet would be determined by a forester or otherwise qualified professional who understands forest ecology and fuel management or a fire professional, prior to treatments. Work would focus on thinning and removing vegetation (e.g., overhanging limbs, understory brush) up to 15 feet above the road surface and up to 100 feet from road edges. Generally, invasive, non-native species, hazardous trees, and fire-hazardous vegetation would be targeted. Small trees under 8 inches diameter at breast height (DBH) may be removed from the understory. In areas with eucalyptus or other fire-hazardous invasive trees, removal of trees up to 10 inches DBH may be performed. Hazardous trees (e.g., dead or dying trees) identified by an arborist or qualified fire professional may also be removed along this evacuation route. No healthy, mature, scenic trees would be removed under this proposed project. Roadside fuel

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reduction treatments would avoid wetted streams and wetlands within the proposed project area.

Treatment Method

Proposed project treatments would include handheld manual and mechanical fuel reduction using chainsaws, string trimmers, pull saws, other similar handheld tools, and chippers. A tractor with a mower or masticator head may operate from the road prism. Ground based equipment would not operate off road. Crews may conduct vegetation trimming from bucket trucks. A trailer-mounted chipper would be operated from the roadways.

The proposed project would incorporate herbicide application as a treatment method for invasive and non-native plant species to support proposed and ongoing fuel reduction projects within the Novato Zone. Herbicide application would only occur where and when needed based on community needs, fire hazard, wildfire ignition potential, slope, aspect, condition, and vegetation composition. No broadcast or aerial spraying would occur. Non-native, invasive shrubs or trees such as broom species, acacia, and eucalyptus may be treated with herbicides. Native plant species would not be targeted. The vegetation would be cut with tools in accordance with the previously approved projects and then, as proposed as part of this project, herbicide applied in a targeted manner, such as painted on cut-stumps, which have been found to have the best success rate for control of certain species, including broom (Oneto, Kyser, and JM 2010). Herbicide treatments could include application of foliar treatments or through wand application. Equipment associated with herbicide application includes backpack and wand applicators.

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).

Herbicides with the active ingredients glyphosate and triclopyr have been found to be most effective at controlling French broom, either alone or in combination (Parsons and Cuthbertson 1992). Depending on the formulation used and the qualified professional, these herbicides may be applied to the leaves of mature plants during the active growing season (April through July), or to the stumps of cut plants (UC IPM 2020). The proposed project would use herbicides, along with other methods of invasive species eradication, as part of an integrated pest management approach. Herbicides would only be used as allowable based on local regulations (e.g., City of Novato Municipal Code Division 19.35.060).

Any pretreatment of vegetation or processing of biomass along previously approved roadways would be conducted in accordance with the previously approved projects. Vehicles, equipment, and qualified contractor crews analyzed in the previously approved projects could conduct the herbicide application activities or a separate vehicle and herbicide application specialist could apply the herbicides.

Biomass Processing

Proposed project debris would be disposed of through chipping and hauling and chipping and broadcasting, or pile burning depending upon the location and condition of the work area. If chipped, the vegetative material would be fed through the chipper and broadcast at treatment areas or hauled away for disposal. Chipped material spread on site would be chipped to under 3 inches in size and would be applied at most to 2 to 4 inches in depth to minimize wildfire risk.

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Disposed debris would be hauled to the Marin Resource Recovery Center, Recology facilities in Novato, or other appropriate facility. It is anticipated that an estimated 20 to 25 cubic yards of vegetative debris would be disposed of each workday.

Workers

Contractor crews would conduct the vegetation removal and chipping along roadways. Each crew would typically consist of six to eight workers. It is anticipated that two or more crews would be conducting treatment at the same time.

Site Access

All vegetation clearance work would occur from existing paved public and private roads. Lane or partial lane closures may be needed for work along roadways. Any lane closures would either require encroachment permits, or if within the City of Novato limits and completed by the Novato Fire Protection District, would be noticed appropriately. Any vegetation treatment activities that are conducted outside the roadway right-of-way would require landowner permission and permits, depending upon the landowner. Any work outside the public road right-of-way would require coordination with the landowners to ensure the work meets the land title requirements. Equipment and vehicles would be staged at the contractor's equipment yard or at pullouts in residential neighborhoods. Equipment and vehicles may be staged in additional public or private locations with landowner permission.

Schedule and Duration

Treatments would be conducted during weekdays from 7:30 am to 5:00 pm. The roadside vegetation thinning treatments under the proposed project are anticipated to start in August 2025. Mowing from the roadway prism would occur annually, where appropriate, along evacuation routes. After initial project implementation at any one location, vegetation removal maintenance would occur every 3 years, unless tree limbs are obstructing emergency access within the evacuation routes, in which case it would occur as needed to remove obstructing vegetation.

Project Design and Implementation Features

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

CUL-1 Training¹

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 CFR Parts 44738-44739 and Appendix A to 36 CFR 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

¹ Adapted from measures in the Marin Municipal Water District, Final Program Environmental Impact Report for the Biodiversity, Fire, and Fuels Integrated Plan (BFFIP EIR), October 2019.

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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 Discovery²

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 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

² Adapted from measures in the Midpeninsula Regional Open Space District, Wildland Fire Resiliency Program Final Environmental Impact Report (WFRP EIR), May 2021.

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a tribal cultural resource, a tribal monitor will be invited to attend during the ground disturbance work.

ET-1 Environmental Training for Biological Resources^{3,4}

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

ES-1 Environmental Surveys for Rare Plants

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

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

³ 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.

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.

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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^{4,5}

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^{4,5}

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

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

IP-3 Treat Invasive Plants Prior to Seeding^{4,5}

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^{4,5}

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 Measures²

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

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

- Sow native grasses and other suitable native vegetation on denuded areas where natural colonization or other replanting will not occur rapidly; use slash or chips to prevent erosion on such areas.

⁵ Adapted from measures in the draft Ecologically Sound Practices Partnership, Ecologically Sound Practices for Vegetation Management (ESP) report, May 2021.

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- Use surface mounds, depressions, logs, rocks, trees and stumps, slash and brush, the litter layer, and native herbaceous vegetation downslope of denuded areas to reduce sedimentation and erosion, as necessary to prevent erosion or slope destabilization.
- Install approved, biodegradable erosion-control measures and non-filament-based geotextiles (e.g., coir, jute) when:
 - Conducting substantial ground-disturbing work (e.g., use of heavy equipment, pulling large vegetation) within 100 feet and upslope of currently flowing or wet wetlands, streams, lakes, and riparian areas;
 - Causing soil disturbance on moderate to steep (10 percent slope and greater) slopes; and
 - Removing invasive plants from stream banks to prevent sediment movement into watercourses and to protect bank stability.
- Sediment-control devices, if installed, will be certified weed-free, as appropriate. Sediment control devices will be inspected daily during active work to ensure that they are repaired and working as needed to prevent sediment transport into the waterbodies.

For areas with less than 50 percent ground cover:

- Any of the above measures
- Stabilize with mulch or equivalent immediately after project activities, to the maximum extent practicable.
- If project activities could result in substantial sediment discharge from soil disturbance, as determined by the qualified personnel (e.g., RPF), organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion.
- Where slash mulch is used, it will be packed into the ground surface such as with heavy equipment so that it is sufficiently in contact with the soil surface.

Once work is completed, the areas will be inspected at least annually if accessible, until groundcover exceeds 70 percent or slopes have stabilized, as determined by a qualified professional. At that time, erosion-control and slope-stability devices may be removed.

GEO-3 Soil Saturation and Rain Event Measures^{1,2,4}

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

- Shut down use of off-road heavy equipment, skidding, and truck traffic when soils become saturated (from rain event) and unable to support the machines. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur.
- Off-road heavy equipment work will be suspended if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours
- Ground disturbing work (e.g., use of heavy equipment, pulling large vegetation) will not occur during rain events (i.e., 0.5 inch of rain within a 48-hour or greater

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period \geq 1.5 inches in 24 hours) and may resume when precipitation stops and soils are no longer saturated. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials.

- Ground disturbing work (e.g., use of heavy equipment, pulling large vegetation) will not occur during rain events (i.e., 0.5 inch of rain within a 48-hour or greater period \geq 1.5 inches in 24 hours) and may resume when precipitation stops and soils are no longer saturated. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials.
- For activities that involve ground disturbing work and have not been stabilized, inspect for evidence of erosion after the first rain event (i.e., 0.5 inch of rain within a 48-hour or greater period) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours.
- For activities that involve ground disturbing work, inspect project areas for the proper implementation of erosion control, as necessary and determined by the qualified personnel (e.g., RPF), prior to the rainy season. If erosion control measures are not properly implemented, the measures will be remediated prior to the first rainfall event.

HAZ-1 Leak Prevention and Spill Cleanup^{1,4}

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

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

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- All diesel and gasoline powered equipment will be maintained per manufacturer's specification, and in compliance with all state and federal emission requirements

HAZ-2 Wildfire Risk Reduction^{1,3,4}

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 Herbicides⁴

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

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

HAZ-5 Protect Vegetation and Special-Status Species from Herbicides⁴

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:

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- 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 I⁶ and II⁷ watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ.
- No herbicides will be applied through any method within a 50-foot buffer of federal Endangered Species Act (ESA) or California ESA listed plant species or within 50 feet of dry vernal pools other than painted or sponged on applications to invasive and/or non-native species cut stumps.
- For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by California Department of Pesticide Regulation, if warranted) to prevent overspray.

NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors^{4,8}

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

⁶ 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.

⁷ 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.

⁸ Adapted from San Francisco Public Utilities Commission (SFPUC), Standard Construction Measures, July 2015.

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- 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

NSO-1 Northern Spotted Owl Nesting Season Avoidance¹

Each project will be reviewed by a qualified biologist to determine if northern spotted owls have potential to occur near proposed project activities. Within areas where northern spotted owl have the potential to occur, work, including mowing with heavy equipment, the mechanical removal of vegetation, or prescribed burning, including pile and broadcast burning, will occur outside of the northern spotted owl nesting season to the extent feasible (February 1 to July 31).

If work must occur during the northern spotted owl nesting season, either NSO-2 or NSO-3 will apply.

NSO-2 Work During Northern Spotted Owl Nesting Season – Surveys¹

Within an area where northern spotted owl has the potential to occur, when work will occur during the northern spotted owl nesting season (February 1 through July 31), and work is not considered low-impact by a qualified biologist the following measure will apply. Low impact type activities include, but are not limited to, goat grazing, hand pulling of weeds, hand trimming of trees and vegetation with non-mechanized equipment, chipping from existing roadways in residential areas, and use of mechanized equipment adjacent to roads or in residential areas that is a typical noise for the environment. In contrast, high-impact activities may include operation of heavy machinery in wildlands with lower baseline environmental noise, or work which produces noise disturbance for a longer duration than is typical in the environment.

The biologists will determine if a known breeding pair is found within 0.25 mile of the proposed activity (i.e., from existing surveys that season or historic data) and perform a nest check to confirm presence. If no survey data for the season has been completed for the areas, two surveys will be conducted by a qualified biologist (whose qualifications have been approved by Marin Wildfire or lead public agency) for nesting northern spotted owls during the months of April and May preceding the commencement of these activities. At a minimum, the survey area will include all suitable nesting habitats within 0.25 mile of any planned activity sites, and then one of the two options listed below will be implemented. If access cannot be secured for surveys, then work should be delayed until after the nesting season, unless it can be shown that noise generation from the activities and the activities proposed would be below noise and visual disturbance levels for northern spotted owls (refer to USFWS Revised Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California) at the nest site, if known.

- If it is conclusively determined that there are nesting northern spotted owls, planned activities that generate noise (e.g., mowing, heavy equipment usage, crews with hand tools that generate noise) in areas without regular human disturbances from human residency (e.g., leaf blowers, home construction and remodeling, roadways), that are within 0.25-mile of an identified active nest will not begin prior to September 1 unless the young have fledged, at which time work may begin no earlier than July 10. Prescribed burns may only occur within suitable

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northern spotted owl habitat (as determined by a qualified biologist) during the nesting season if protocol surveys have determined that northern spotted owl nesting is not occurring in the area of planned activity.

- If work must occur within 0.25 mile, and work has been determined to have the potential to impact an active northern spotted owl nest, CDFW and USFWS would be consulted to determine if take could occur and whether further permits are required.

NSO-3 Northern Spotted Owl Habitat Alteration¹

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

NSO-4 Retain Dusky-footed Woodrat Nests^{1,5}

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

NB-1 Nesting Bird Season Avoidance^{1,4,5,9}

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through July 31st¹⁰. Not all species nest between the regulatory season, and active nests that are encountered year-round are protected.

NB-2 Nesting Bird Surveys^{1,4,5}

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

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

Nesting bird surveys will occur within no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7 days, a follow-up survey will be conducted prior to the restarting of work. Appropriate survey areas will

⁹ Adapted from Marin County Parks (MCP), Bird Nesting Survey Training Manual, 2017.

¹⁰ Note that the general nesting season between February 1 and July 31 is a guideline, and that birds may begin nesting beforehand, and complete nesting after these dates. Regardless, active nests are protected year-round. Avian nesting season may begin as early as January 1.

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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^{1,4,5,7}

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:

- 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^{1,4,5,7}

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^{3,4}

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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RB-2 Avoidance of Maternity Roosts and Day Roosts³

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 Restrictions³

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 Removals³

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^{4,5}

In riparian areas, treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are representative of healthy stands of the riparian vegetation types that are characteristic of the region. Allowable activities include hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. Mature, healthy trees will not be removed from a riparian corridor. Any activities conducted within a riparian corridor will be conducted so as to avoid alteration to a bed, channel, or bank of a waterway and all debris, including sawdust, chips, or other vegetative material, will be prevented from entering the bed, channel, or bank of a waterway, unless a permit from the California Department of Fish and Game under Section 1600 is obtained.

TR-1 Emergency Access to Project Areas^{1,2}

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

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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 Measures³

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

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

Discussion of Potential Exceptions (CEQA Section Guidelines 15300.2)

(a) Location:

Sensitive habitats, including wetted watercourses and wetland areas would be avoided. Riparian woodlands are limited along road edges and unlikely to be treated but any vegetation trimming or thinning would be conducted by hand and alteration to and deposition of debris would be avoided within the bed, channel, or bank of a waterway (SH-1). Additionally, herbicide application would be conducted by hand or wand in a targeted manner for invasive species management. If needed, herbicides approved for use in aquatic environments would be applied by hand in riparian habitats and only during low-flow periods (HAZ-5). Due to the application method of herbicides and the location, scope, and design of the proposed project and previously approved projects, the proposed project would not adversely affect riparian habitats as the work would not affect shade or species diversity and could be beneficial if invasive species removal is needed, therefore, exception (a) does not apply.

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(b) Cumulative Impact:

Other roadside vegetation treatment activities and herbicide application along evacuation routes are occurring in the Novato Zone and greater Marin County. The proposed project would utilize both herbicides and manual and mechanical vegetation treatment activities to treat non-native and invasive species that are encountered in both proposed and previously approved vegetation treatment areas. Ongoing vegetation maintenance along the proposed evacuation routes and of previously approved projects would include the types of vegetation treatment activities described in the previously approved NOEs, which would be performed periodically to maintain fuel reduction areas to help slow or stop the spread of wildfire and provide safe access for evacuating residents and emergency responders. The visual character of the proposed project work areas would be modified each time vegetation treatment treatments are implemented as part of cumulative project activities in addition to targeted herbicide application of non-native species to reduce fuel loads, 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, HAZ-4, HAZ-5) 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 effects as defined by CEQA Guidelines Section 15300.2 and therefore, exception (b) does not apply.

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

The proposed vegetation treatment and herbicide application activities along roadways are considered routine and are typical throughout the County and Bay Area region. Sensitive waterways would be avoided. Significant effects on special-status species would not occur (e.g., NB-1, RB-1). The proposed project would modify the non-native and invasive vegetation, but the natural character would remain and could be enhanced by the removal of invasive species, and the aesthetic change would not be substantial. Therefore, there are no unusual circumstances associated with the proposed project or the environment in which it would be implemented, and exception (c) does not apply.

(d) Scenic Highways:

U.S. 101 and State Route (SR 37) are eligible California State Scenic Highways that could be treated by the proposed project (Caltrans 2024). The proposed vegetation management activities and herbicide application would result in minor changes to the vegetation patterns and would only occur within up to 100 feet of the road edge. Views from U.S. 101 and SR 37 would not be degraded, because the visual change would be minimal, and the natural vegetation and characteristics of the area would remain. Personnel, equipment, and vehicles may be visible along the roadways for short durations, but vegetation treatment activities and herbicide application would occur in any one area for a short period of time; therefore, exception (d) does not apply.

(e) Hazardous Waste Sites:

Per the current government database of hazardous waste sites at the time of this filing, several hazardous waste sites are located adjacent to the evacuation routes in the areas that could have vegetation treatment (SWRCB 2025). No ground disturbing activities that could unearth potentially contaminated soils and expose the public or the environment to contamination would occur; therefore, exception (e) does not apply.

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(f) Historical Resources:

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

Environmental Assessment

Aesthetics

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

The visual character along the evacuation routes is characterized by primarily residential and forested recreational areas. Vegetation consists of urban forests and vegetation as well as grassy lowlands and wetlands. Many of the roadways are within an urban environment and would not require vegetation treatment. Viewers in the vicinity of proposed project areas could include recreationalists and homeowners that are adjacent to the roadways.

Equipment and trucks performing the work would be temporarily visible along the evacuation roadways. Vegetation treatment and herbicide application activities would occur in one area for a short period of time (a few hours to a day). Motorists on the public roadways would be able to see crews and treatment activities.

Minor changes to the vegetation patterns and form would occur from targeted herbicide application of invasive plants as well as manual and mechanical removal of small or hazard trees and shrubs within typically 10 feet from roadways. The vegetative material would be chipped and hauled away from the work area. Viewers in the immediate vicinity may notice changes in the density and type of vegetation along the evacuation routes. These methods of vegetation treatment and herbicide application currently occur in the Novato Zone as well as throughout broader Marin County to maintain ingress and egress as well as reduce potential for ignition from roads. This type of work and vegetation management is typical of the area and a characteristic part of the existing environment. The proposed project would not degrade views from nearby public vantage points, roads, or trails because the visual change would be minimal, is typical of the area, and would only extend up to 100 feet from roadways in select areas. Furthermore, the visual change from targeted herbicide use affecting invasive species would be minimal, and would occur in targeted areas, as determined to be appropriate by a qualified professional. The natural vegetation and characteristics of the areas would remain. Visual degradation as seen from State or locally designated scenic roads or vistas, including the Marin County ridge and upland greenbelt areas, would not occur. Significant adverse effects to aesthetics would not occur.

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Agriculture and Forestry Resources

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

The proposed vegetation treatment and herbicide application activities would not convert designated farmland to non-agricultural uses. Project activities would typically occur within 10 feet of roadways, but may extend up to 100 feet from the road edge, and primarily involve thinning and removal of small fire-hazardous trees, shrubs, and underbrush and targeted herbicide application targeting non-native invasive species along evacuation routes. The proposed project would not result in the loss of forest land, nor would it convert forestry land to non-forestry use. Adverse effects on agriculture and forestry resources would not occur.

Air Quality

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

Vehicles and equipment for vegetation treatment activities would emit diesel particulate matter and criteria air pollutants. In a typical day, worker trucks, chainsaws, string trimmers, bucket trucks, pull saws, other similar handheld tools, and chippers would operate for a few hours per crew and up to one off-haul trucks would travel to a green waste disposal center a day. The potential use of an additional vehicle for the herbicide application activities beyond those analyzed in the previously approved NOEs would emit diesel particulate matter and criteria air pollutants. No tilling or grading activities that could generate fugitive dust emissions would occur.

Biological Resources

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

Biological database searches for the vicinity of the proposed and previously approved treatment areas where vegetation treatment and herbicide application is proposed to potentially occur were conducted (CDFW 2025; CNPS 2025). Of the species identified during the database search, species were determined to have potential to occur within the work areas if the species is known to occur in the vicinity of the sites and if the sites or immediate vicinity contains suitable habitat to support these species.

Special-Status Plants and Sensitive Vegetation Communities

Riparian and wetland habitats occur along or near road edges. Habitat for sensitive natural communities, including coastal brackish marsh and northern coastal salt marsh, occurs adjacent to the work area. Serpentine soils are documented within the project area as shown in Figure 2 although no special-status plant species associated with serpentine habitats have a moderate potential to occur (USDA 2020). One special-status plant species has a moderate potential to

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occur in the roadside work areas (refer to Table 1 for information and Figure 3 for locations of known occurrences in relation to the work area).

Vegetation trimming and removal would be conducted by hand to remove fuel loading and allow safe ingress and egress. Workers would receive training from a qualified professional prior to beginning the vegetation treatments in areas where sensitive biological resources could occur. Training would include identification of special-status plant species and sensitive communities for avoidance (ET-1). The training for this proposed project would involve identification of congested-headed hayfield tarplant for avoidance if encountered along the roadways and establishing a 50-foot buffer around special-status species where herbicide application would not occur.

Vegetation treatment and herbicide application activities would focus on removing invasive and non-native species, leaving native species in place (IP-4) and the types of activities generally would not disrupt the seed banks of these species. Workers would clean boots, equipment, and handle vegetation to avoid spreading invasive species and plant pathogens when moving between different project locations (IP-1, IP-2, IP-3). Herbicide application would be conducted by hand to remove and kill invasive species, which would also reduce fuel loads and allow safe ingress and egress of emergency personnel and residents. Herbicide applicators would receive training on the application, storage, and handling of herbicides. The previously approved projects require all vegetation treatment workers to receive training from a qualified professional prior to beginning the vegetation treatments, as discussed above (ET-1).

The blooming season for the one plant species with a moderate potential to occur ranges from April to November. Treatment of previously approved treatment areas is ongoing. Initial treatment is anticipated to begin in August 2025 and work would be performed within the blooming season. Maintenance of evacuation routes in future years may be performed in the blooming season. The scope of the vegetation thinning activities and herbicide application is limited to a typically 10-foot zone around roadways but up to 100 feet in areas determined appropriate by a qualified professional.

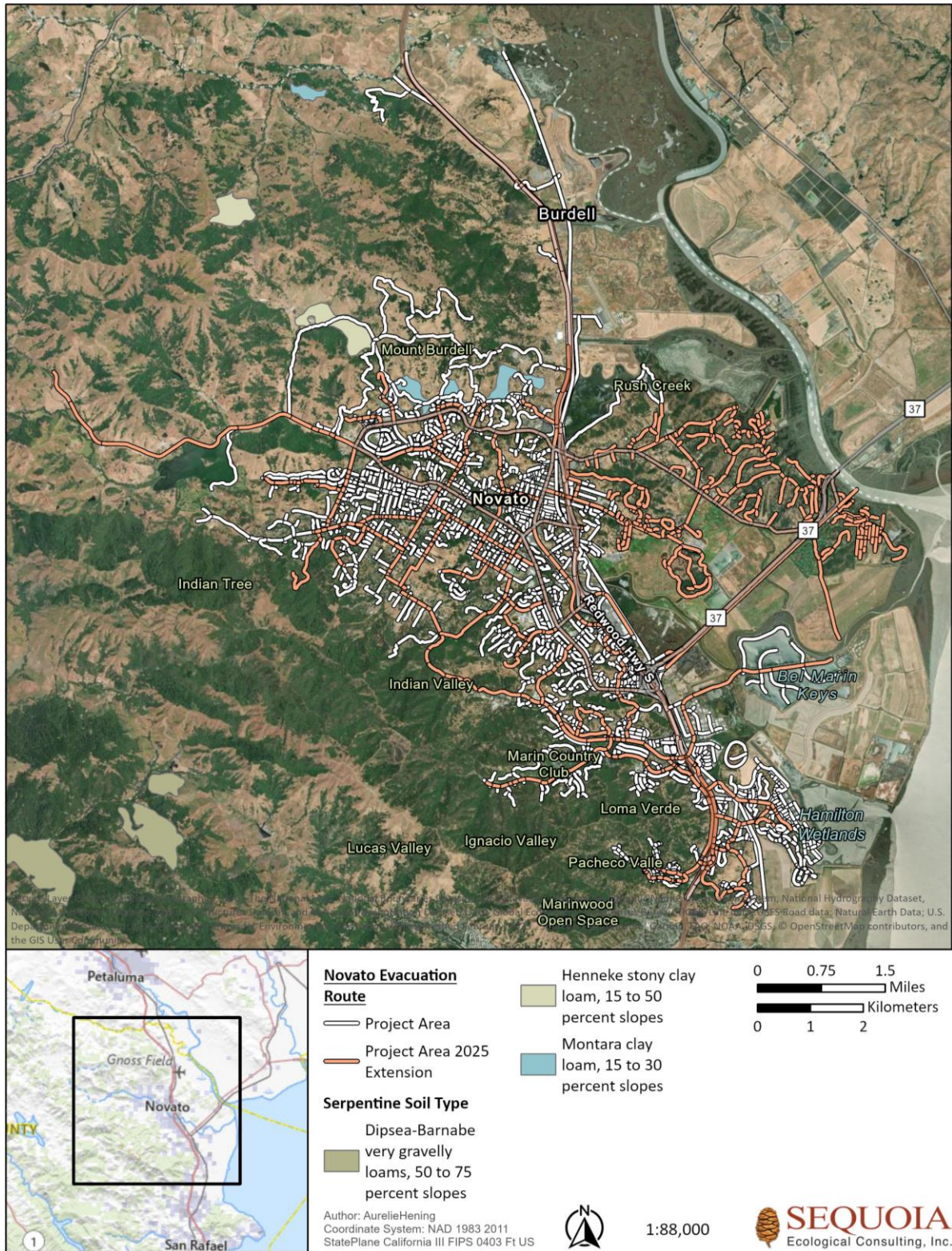
Roadways have been studied to act as vectors for invasive plant species, with traffic volume as a key variable related to dispersal (Lemke et al. 2021). Roadways have been found by most studies to be beneficial for non-native and invasive plant species, particularly in forested or grassland areas (Lázaro-Lobo and Ervin 2019). Appropriate management of roadsides has been found to support high levels of biodiversity and reduce effects such as the spread of invasive species (Lázaro-Lobo and Ervin 2019). The vegetation trimming and removal would generally focus on removing invasive and fire-hazardous species, leaving native species in place (IP-4) and the types of activities generally would not disrupt the seed banks of these species. A reduction in roadside invasive plant species may be beneficial for native plants including the special-status species with a potential to occur in the area. Special-status shrub and tree species would be specifically called out in the training for avoidance of any species that look similar (e.g., manzanita) unless a survey is conducted to distinguish species (ET-1).

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Figure 2 Areas of Modeled Serpentine Soils



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Figure 3 Special-Status Plant Occurrences

Figure 4 Special-Status Wildlife Occurrences

Figures omitted to protect special-status wildlife and plant species

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Particles or vapors from herbicide drift may impact non-target special-status plant species in the immediate vicinity of the target species. 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.). If off-site drift from herbicide application is proposed that could damage the flowering body or seed dispersal of plant species with a moderate potential to occur in areas with suitable habitat and during the blooming season, surveys would be conducted prior to treatment (ES-1). 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). Herbicides would not be applied within a 50-foot buffer of a special-status species (HAZ-5). 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 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.

The relatively narrow scope of the proposed treatment activities limits the potential to encounter and impact a significant number of any one special-status species. Therefore, non-serpentine special-status plant species would have a low potential to be significantly impacted by treatment within 100 feet of road edges. All sensitive plant species have a low to no potential to be impacted by vegetation removal activities with the worker training and surveys for avoidance or modified methods, when needed, as shown in Table 1. Significant impacts on native vegetation communities and special-status plants species would not occur.

Special-Status Wildlife

The California red-legged frog, burrowing owl, white-tailed kite, saltmarsh common yellowthroat, and northern spotted owl have a moderate potential to occur within certain portions of the overall evacuation route treatment area (refer to Table 1 for information with specifics on location and Figure 4 for locations of known occurrences in relation to the proposed project).

Studies have found that forest herbicides (e.g., glyphosate, imazapyr) used according to label directions are nontoxic and do not bioaccumulate or bioconcentrate in birds (Clark et al. 2009). Due to the discrete application of herbicides by hand in a targeted manner on invasive plants, the proposed project would pose a low risk to bats and nesting birds. Pretreatment of vegetation as part of the proposed and previously approved projects, if needed prior to herbicide application, would occur from February to August would involve implementation of appropriate nesting bird and/or maternity roosting bat surveys (NSO-1, NSO-2, NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4) and nest or roost avoided. Workers would be trained to identify and avoid the types of wildlife species with a potential to occur in the work areas (ET-1).

Migratory birds and birds of prey have a potential to nest or forage within the project site, and are protected under the Migratory Bird Treaty Act and Sections 3503 and 3503.5 of the California Fish and Game Code. Project activities could occur from February 1 to July 31, during which time appropriate nesting bird and/or maternity roosting bat surveys would be conducted to avoid any effects to nesting birds and maternity roosting bats (per PDIFs NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3, RB-4). If active nests are observed at the project site, an avoidance buffer

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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).

The California red-legged frog has a moderate potential to occur within the evacuation route treatment area in the San Marin and Black Point communities where suitable habitat is nearby. Wetland and streams that may provide habitat for these species would be avoided by project activities. Herbicide use impacts on amphibians have varying effects ranging from stunted growth to death (Shirke 2010; King and Wagner 2010). Approved herbicides for use in aquatic environments by the U.S EPA and the California Department of Pesticide Regulation (DPR) include triclopyr, glyphosate, and imazapyr (Siemering 2005). Studies have found that triclopyr, glyphosate, and imazapyr have low risk to aquatic species (BLM 2007). Wetland and streams that may provide habitat for these species would be avoided by project activities. Herbicide mixing would typically occur at the contractor's warehouse and would occur away from waterways and only herbicides labeled for use in aquatic environments would be used when working in riparian habitats (HAZ-5). Workers would be trained to identify the California red-legged frog for avoidance (ET-1).

Several activity centers and nests are documented within 0.25 mile or adjacent to some of the proposed evacuation route treatment areas. As such, there is a moderate potential for northern spotted owl to occur within eastern evacuation route treatment areas (refer to Table 1 for general locations). California ridgeway's rail and California black rail are state and federally protected species that have a low potential to occur along the evacuation routes but may nest in suitable habitat within 500 feet of the eastern evacuation routes near the Hamilton, Bel Marin Keys, Black Point, and Bahia communities.

Vegetation treatment and removal would target invasive, non-native, fire-hazardous vegetation and accumulative dead biomass along the roadsides. Small trees, 8 inches DBH and smaller, would be removed, as needed, as part of clearance for horizontal spacing. This vegetation would grow back and be retreated as needed. Vegetation treatment would typically occur within 10 feet, and rarely up to 100 feet from roadsides.

Northern spotted owl typically prefer dense canopy closure of mature and old-growth trees with logs, standing snags, and live trees with broken tops. Most of the Marin County owls are known to use younger forests than those further north in California (MMWD 2019). The owls also require open space in the understory or less dense habitats to allow flight under the canopy to forage (Gutiérrez, Franklin, and Lahaye 2020). The proposed project would thin vegetation in the understory along roads. Given the work would be focused on removal of hazardous fuels alongside roadsides that are generally in urban or suburban residential areas and the relatively low intensity of the vegetation thinning activities, the work would not be considered major habitat alteration for northern spotted owls. Additionally, if any large trees 10 inches DBH or greater are identified for removal in areas with suitable northern spotted owl habitat based on forestry practices, a qualified northern spotted owl biologist would be consulted (NSO-3). Impacts to prey density should not be affected as woodrat nests would be avoided, if encountered (NSO-4).

Herbicide application would typically occur within discrete, targeted areas up to 100 feet from road edges. Ecological risk assessments have found that use of forest herbicides (e.g., glyphosate, imazapyr) used according to label directions are low risk on small mammals (e.g., woodrats) (Clark et al. 2009). Studies have also found that glyphosate, imazapyr, and triclopyr have low to no risk to birds of prey that consume contaminated prey or from an accidental spill

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(BLM 2007). As discussed above, forest herbicides do not bioaccumulate or bioconcentrate in birds when used in accordance with label instructions (Clark et al. 2009).

California ridgeway's rail, California black rail, and northern spotted owl may be startled by noise from treatment activities, which could be audible to and disturb nesting birds. There are several studies regarding noise impacts to northern spotted owl (*Strix occidentalis caurina*), marbled murrelet (*Brachyramphus marmoratus*), and Mexican spotted owl (*Strix occidentalis lucida*) that may be considered relevant for the special-status bird species in consideration for this project. USFWS guidance cites studies of noise effects on Mexican spotted owls with a finding that the owls, during both the nesting season and the non-nesting season, did not flush from helicopter noise unless the noise was at least 92 dBA (Delaney, Grubb, and Peier 1999). In accordance with USFWS guidance, the recommended threshold for noise-generating activities affecting northern spotted owl is approximately 80 dB and lower. Chippers could produce the highest noise levels of any equipment used on site at 85 dBA L_{max} at 50 feet, which would attenuate to less than 80 dBA L_{max} at 75 feet away. The USFWS guidance document addresses the effects of noise disturbance on northern spotted owls and marbled murrelets to draw conclusions about the potential for identified effects to rise to the level of "take", as defined by the Federal Endangered Species Act, during the breeding season for rails. While the guidance aims to reduce take of the aforementioned species, the document is not a regulation. Noise levels from treatment activities would be generally lower than 80 dB in the area of potential nesting habitat for the rails. In accordance with USFWS guidance for two federally listed bird species, potential noise levels from treatment activities would be considered moderate or low in potential rail habitat (USFWS 2020). Noise levels generated by equipment operated during treatments are not anticipated to result in take of nesting rails. Vegetation treatment activities would occur outside of the Northern spotted owl nesting season to the extent possible (NSO-1). If high-impact, noise-generating work was to occur during the nesting season, surveys would be conducted to determine if a breeding pair were located within 0.25 mile of the work area, and treatments would not occur before July 31 if an active nest was present, unless the young have fledged (NSO-2). Additionally, intermittent noise is typical along the roadsides proposed for treatments from residential activities such as the use of mowers and leaf blowers for landscaping, motorcycles, and heavy trucks. Noise levels associated with these typical activities include leaf blowers with noise levels of 76 to 81.5 dBA at 50 feet¹¹, motorcycles with noise levels ranging from 70 to over 100 dBA at 50 feet¹², and garbage trucks with noise levels ranging from 63 to 80 dBA at 50 feet.¹³ Other similar and relatively common short-duration noise includes emergency vehicle sirens such as police and fire vehicles, which nesting birds in and around roadsides would be acclimated to. No significant adverse effects on special-status wildlife species would occur.

¹¹ Calculated from noise level of 100 to 105.9 dBA at 3 feet away (operator distance) (Husqvarna, n.d.; Balanay, Kearney, & Mannarino, 2016).

¹² The large range is due to variations in engines and mufflers across different motorcycle models (Rochat, 2013; USEPA, 1974)

¹³ Calculated from noise levels of 83 to 100 dBA at 5 feet away (IAC Acoustics, 2021; Work Safe BC, 2021).

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Wetlands

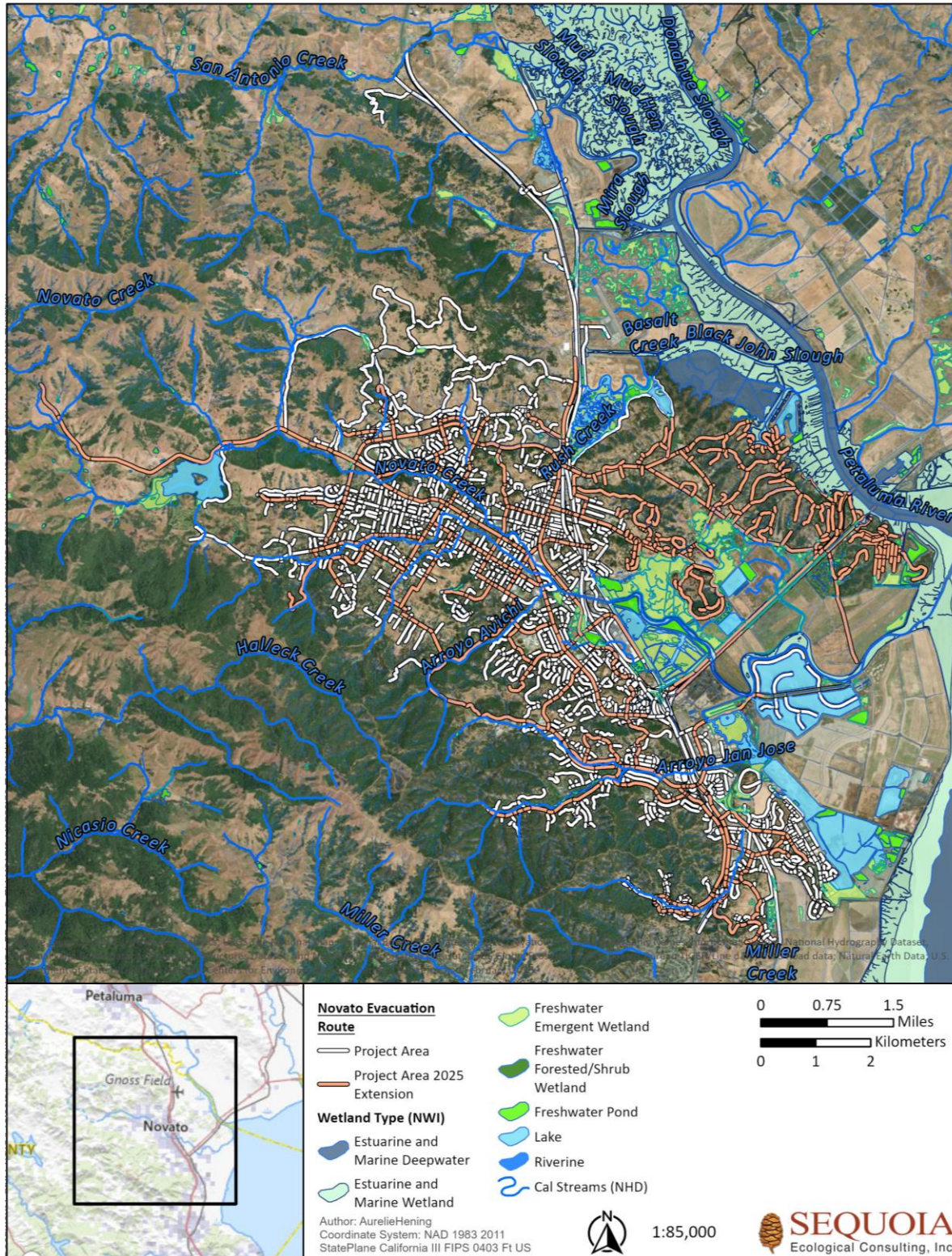
Streams intersect or occur adjacent to the project work areas as shown in Figure 5 of the proposed project (USFWS 2025). Streams would be avoided by project activities. Seasonal wetlands may be encountered within the roadsides of the proposed project. As discussed above, only herbicides labeled for use in aquatic environments would be used in riparian habitats and herbicide mixing sites would be located away from waterways. Training would ensure that workers conducting manual and mechanical activities will avoid wetlands (ET-1). Significant impacts on wetlands would not occur.

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Figure 5 Wetlands and Waterways



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

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Sensitive Plants					
<i>Alopecurus aequalis</i> var. <i>sonomensis</i>	Sonoma alopecurus	FE, CRPR 1B.1	Marshes and swamps (freshwater), riparian scrub	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	CRPR 1B.2	Wetland, riparian woodland	Low; suitable habitat may be present nearby but unlikely to occur along evacuation routes. Four records within Mt. Burdell OSP and Olompali State Historic Park (CNDDDB 2025) and 12 occurrences recorded in Olompali State Historic Park 1.5 miles northeast of San Marin (Calflora n.d.). No occurrences within proximity to evacuation routes.	Low; species is unlikely to occur on roadsides but would be included in environmental training for avoidance (ET-1).
<i>Blennosperma bakeri</i>	Sonoma sunshine	FE, SE, CRPR 1B.1	Vernal pools	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Calochortus tiburonensis</i>	Tiburon mariposa-lily	FT, ST, CRPR 1B.1	Valley and foothill grassland (serpentinite)	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
<i>Castilleja affinis</i> var. <i>neglecta</i>	Tiburon paintbrush	FE, ST, CRPR 1B.2	Valley and foothill grassland (serpentinite)	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Ceanothus masonii</i>	Mason's ceanothus	SR, CRPR 1B.2	Chaparral (openings, rocky, serpentinite)	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Point Reyes salty bird's-beak	CRPR 1B.2	Marshes and swamps (coastal salt)	None; suitable habitat may occur within wetlands near eastern evacuation routes but is unlikely to occur along roadsides. No occurrences near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Chloropyron molle</i> ssp. <i>molle</i>	soft salty bird's-beak	FE, SR, CRPR 1B.1	Marshes and swamps (coastal salt)	None; suitable habitat may occur within wetlands near eastern evacuation routes but is unlikely to occur along roadsides. No occurrences near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Chorizanthe valida</i>	Sonoma spineflower	FE, CE, CRPR 1B.1	Coastal prairie (sandy)	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Delphinium bakeri</i>	Baker's larkspur	FE, SE, CRPR 1B.1	Broadleafed upland forest, coastal scrub, valley and foothill grassland	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
<i>Delphinium luteum</i>	golden larkspur	FE, SR, CRPR 1B.1	Chaparral, coastal prairie, coastal scrub	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
<i>Eriogonum luteolum</i> var. <i>caninum</i>	Tiburon buckwheat	CRPR 1B.2	Chaparral, coastal prairie, valley grassland, serpentine	Low; suitable habitat near to evacuation routes but unlikely to occur roadside. One occurrence 0.25 mile north of San Andreas	Low; species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				Fire Road in serpentine outcrop and 4 occurrences in Mt. Burdell Open Space Preserve (Calflora n.d.; CDFW 2025). All occurrences within 0.5 mile north of evacuation routes in San Marin. No occurrences recorded outside of San Marin.	
<i>Fritillaria liliacea</i>	fragrant fritillary	CRPR 1B.2	Northern coastal scrub, coastal prairie, valley grassland, wetland-riparian	Low; suitable habitat present in grasslands and riparian areas near evacuation routes, but suitable habitat is unlikely to occur along roadsides. Two occurrences on Open Space Preserve 0.5 mile north of evacuation routes (CDFW 2025) and 8 occurrences north/northeast of San Marin 0.10 mile from Simmons Lane in San Marin. One occurrence in riparian habitat near Stafford Lake, within 0.05 miles of Novato Blvd evacuation route in San Marin (Calflora n.d.). No occurrences recorded outside of San Marin.	Low; species would be included in environmental training for avoidance (ET-1).
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	congested-headed hayfield tarplant	CRPR 1B.2	Northern coastal scrub, valley grassland	Moderate; suitable habitat may be present and habitat may occur along roadsides. One occurrence in Loma Verde Preserve within 0.25 miles of evacuation routes	Low; species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				within Raphael Village (CNDDDB 2025). Twelve occurrences in Mt. Burdell Open Space Preserve near San Marin Fire Road within 0.15 mile from evacuation routes in San Marin, one occurrence in Deer Island Preserve north of SR37, 2 occurrences in Ignacio 0.3 mile from Hamilton Pkwy evacuation route (Calflora n.d.). Evacuation routes with potential to occur include San Andreas Dr., San Marin Dr., Estado Way., all routes within Deer Island Preserve, Ignacio Blvd, Bel Marin Keys Blvd, and all evacuation routes within Hamilton.	
Hesperolinon congestum	Marin western flax	FT, ST, CRPR 1B.1	Serpentine soils; primarily serpentine bunch grass, chaparral or other low elevation grasslands	Low; suitable habitat present in Mt. Burdell Open Space Preserve but unlikely to occur along roadsides. One occurrence located north of San Andreas Fire Road in serpentine outcrop (CDFW 2025). Four occurrences in San Marin: One occurrence within 0.25 mile of Wood Hollow Dr. evacuation route and 3 occurrences in Mt. Burdell Open Space Preserve within 0.25 mile of San Marin Dr. evacuation route (Calflora n.d.). No	Low; species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				occurrences recorded outside of San Marin.	
<i>Holocarpha macradenia</i>	Santa Cruz Tarplant	FT, SE, CRPR 1B.1	Coastal prairie along central coast, grassy areas, clay soil	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
<i>Lasthenia conjugens</i>	Contra Costa goldfields	FE, CRPR 1B.1	Cismontane woodland, playas (alkaline), Valley and foothill grassland, Vernal pools	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Lilium pardalinum</i> ssp. <i>pitkinense</i>	Pitkin marsh lily	FE, SE, CRPR 1B.1	Cismontane woodland, marshes and swamps (freshwater), meadows and seeps	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Navarretia leucocephala</i> ssp. <i>bakeri</i>	Baker's navarretia	CRPR 1B.1	Freshwater wetlands, yellow pine forest, northern oak woodland, foothill woodland, valley grassland, wetland-riparian	Low; suitable habitat present in Mt. Burdell Open Space Preserve and may occur along roadsides. Six occurrences from 2019 located in Hidden Lake in San Marin 0.6-mile northeast of San Andreas Dr. No occurrences recorded outside of San Marin.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Pentachaeta bellidiflora</i>	white-rayed pentachaeta	FE, SE, CRPR 1B.1	Cismontane woodland, Valley and foothill grassland (often serpentinite)	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
<i>Pleuropogon hooverianus</i>	North Coast semaphore grass	ST, CRPR 1B.1	Broad-leaved upland forest, meadows and seeps, North Coast coniferous forest	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
<i>Polygonum marinense</i>	Marin knotweed	CRPR 3.1	Marshes and swamps (brackish, coastal salt)	None; suitable habitat may occur within wetlands near evacuation routes but is unlikely to occur along roadsides. No occurrences near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Streptanthus anomalus</i>	Mount Burdell jewelflower	CRPR 3.1	Shallow, serpentine soils in the ecotone between oak woodland and grassland on Mt. Burdell	Low; suitable habitat is present in Mt. Burdell Open Space Preserve. Six grouped occurrences 0.25-mile northeast of Simmons Lane evacuation route in eastern San Marin.	Low; species would be included in environmental training for avoidance (ET-1).
<i>Streptanthus glandulosus</i> ssp. <i>pulchellus</i>	Mt. Tamalpais bristly jewelflower	CRPR 1B.2	Chaparral, valley Grassland	None; species is mostly restricted to Mt. Tamalpais. Single occurrence from a photo taken in 2009 at Big Rock Ridge in Lucas Valley, 1.33 miles away from closest evacuation route (CDFW 2025).	None; species is unlikely to occur.
<i>Streptanthus glandulosus</i> ssp. <i>niger</i>	Tiburon jewelflower	FE, SE, CRPR 1B.2	Serpentine soils; southwest facing slopes of the Tiburon Peninsula	None; only known to occur on Tiburon Peninsula at Old St. Hilary's preserve, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Trifolium amoenum	two-fork clover	FE, CRPR 1B.1	Coastal bluff scrub, Valley and foothill grassland (sometimes serpentinite)	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
Trifolium hydrophilum	saline clover	CRPR 1B.2	Wet, alkaline soils, salt marshes, and open areas with alkaline soils. It can also be found in marshes, swamps, and valley/foothill grasslands (mesic, alkaline).	None; suitable habitat unlikely to occur along roadsides but may occur within wetlands near SR 37. One occurrence near Sears Point 3 miles east of Black Point-Green Point (CDFW 2025).	None; work would not occur in suitable habitat and species is unlikely to occur.
Trifolium polyodon	Pacific Grove clover	SR, CRPR 1B.1	Closed-cone coniferous forest, Coastal prairie, Meadows and seeps, Valley and foothill grassland	None; suitable habitat unlikely to occur, no occurrences recorded within or near evacuation routes.	None; species is unlikely to occur.
Sensitive Wildlife					
Dicamptodon ensatus	California giant salamander	SSC	Meadows and seeps within North Coast coniferous forest, and riparian forest. Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County and	None; suitable habitat unlikely to occur along roadsides, but western evacuation routes may be within dispersal range from suitable habitat. Single 2010 occurrence in Miller Creek in Lucas Valley approximately 2 miles west of Rafael Village (CDFW 2025).	None; work would not occur in suitable habitat and species is unlikely to occur as species is highly associated with streams in wet coastal forests.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults typically found in wet forests under rocks and logs near streams and lakes		
Rana boylei pop. 1	foothill yellow-legged frog - north coast DPS	SSC	Closely associated with rocky streams in a variety of habitats, including foothill hardwood, valley-foothill riparian, coastal scrub, mixed conifer, mixed chaparral, and wet meadows	Low; suitable habitat unlikely to occur along roadsides, but western evacuation routes may be within dispersal range from suitable habitat. One occurrence 2.25 miles east of Novato Blvd evacuation route and 6 miles east of San Marin. One occurrence at Nicasio headwaters 3 miles southwest of Rafael Village. Two occurrences in 1999 and 2020, 3 miles southwest of Wild Horse Valley Drive in Halleck Creek (CDFW 2025).	None; work would not occur in suitable habitat and species is unlikely to occur.
Rana draytonii	California red-legged frog	FT, SSC	Breeds in ponds and slow moving streams, may use grassland and oak woodland for dispersal and foraging	Moderate; suitable habitat present in the form of freshwater ponds at Mount Burdell Open Space Preserve (San Marin) where CRLF were detected in 2010 and 2015. One occurrence 2.3 miles northwest of San Marin in 2011. One occurrence 1 miles	Low; work would not occur in suitable habitat and off-road ground based equipment is not proposed, limiting potential for mortality, species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				northeast of Black Point in 1997. Evacuation routes in (San Marin Novato Blvd., San Andreas Dr., San Marin Dr,) and Black Point (including Bugeia Ln., Bahia Dr., Laguna de Vista Dr., Topaz Dr., Crest Rd. and connecting smaller streets in Bahia) are within dispersal range of CRLF (CDFW 2025).	
Agelaius tricolor	tricolored blackbird	ST, SSC	Constructs nests in dense stands of tule, cattail, or other dense marshland vegetation. Requires protected nesting substrate and foraging areas within a few miles of the colony.	Low; suitable habitat is located near evacuation routes in Hamilton, Bel Marin Keys, Black Point and Bahia. Multiple observations in each of these locations from 2020 to 2025 (Cornell Lab of Ornithology 2025).	Low; work would not occur in suitable habitat and would occur outside nesting season or surveys conducted. Species would be included in environmental training for avoidance (ET-1).
Athene cunicularia	burrowing owl	SE, SSC	Nests in fossorial mammal burrows located in grasslands.	Moderate; suitable habitat present near evacuation routes east of U.S. 101. Recent occurrences recorded near Hamilton (4), Black Point (4), Burdell (3), Bel Marin Keys (2) (CDFW 2025). 10+ observations in 2025 of overwintering burrowing owls (eBird 2025). Evacuation routes in proximity to occurrences include San	Low; work would occur outside nesting season or surveys conducted and active burrows avoided (NB-1 through NB-4). Off-road ground-based equipment is not proposed, limiting potential for burrows to be crushed. Species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				Andreas Dr., San Marin Dr., Estado Way, Simmons Ln., Atherton Ave., Saddle Wood Dr., Bolero Ct., Topaz Dr., Olive Ave, Club Dr., Deer Island Ln. and all routes within Deer Island, Bel Marin Keys Blvd., Hamilton Pkwy and Marin Valley Dr.	
<i>Brachyramphus marmoratus</i>	marbled murrelet	FT	Breeds inland on mountains near coast	None; suitable habitat does not occur, no occurrences recorded near evacuation routes.	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Charadrius nivosus nivosus</i>	western snowy plover	FT, SSC	Nests in coastal dunes and salt ponds	None; suitable habitat present in Hamilton Wetlands but not along evacuation routes; sporadic observations recorded near Hamilton (Cornell Lab of Ornithology 2025).	None; work would not occur in suitable habitat and species is unlikely to occur.
<i>Elanus leucurus</i>	white-tailed kite	FP	Nests in tall shrubs and trees, forages in grasslands, marshes, and ruderal habitats.	Moderate; suitable foraging and nesting habitat occurs near evacuation routes in Hamilton, Black Point and San Marin. Frequently sighted at Hamilton Wetlands, Olompali State Historic Park, Deer Island, and Mt. Burdell Open Space Preserve (Cornell Lab of Ornithology 2025). Evacuation routes with potential to occur include Novato Blvd., San Miguel Way, San Andreas Dr., Indian Valley Fire Rd., Indian Valley Rd., Palmer Dr., Hamilton	Low; work would occur outside nesting season or surveys conducted (NB-1 through NB-4). Species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				Pkwy, Main Gate Rd., Bel Marin Keys Blvd., all routes within Deer Island Preserve, all routes within Black Point, Black Point-Green Point and Bahia.	
<i>Geothlypis trichas sinuosa</i>	saltmarsh common yellowthroat	SSC	Nests in herbaceous vegetation in densely vegetated brackish and freshwater marshes, moist floodplains, and woody swamps.	Moderate; suitable foraging and nesting habitat occurs near evacuation routes in Hamilton, Black Point and San Marin. Frequently sighted at Hamilton Wetlands, Olompali State Historic Park, Deer Island, and Mt. Burdell Open Space Preserve (Cornell Lab of Ornithology 2025). Evacuation routes with potential to occur include Bolero Ct., Topaz Dr., Channel Dr., Bachelors Rd., Harbor Dr., Havenwood Dr., railroad route southwest of Harbor Dr., Beattie Ln., Hunters Club, Rd., Norton Ave., Days Island Rd., Twowater Tr., Bel Marin Keys Blvd.	Low; work would not occur in suitable habitat and would occur outside nesting season or surveys conducted (NB-1 through NB-4). Species would be included in environmental training for avoidance (ET-1).
<i>Laterallus jamaicensis coturniculus</i>	California black rail	ST, FP	Wetlands and marshes. Nests in higher elevations of salt and freshwater marshes and periodically inundated tall vegetation	Low; suitable nesting and foraging habitat occurs in wetlands within 0.1 miles of eastern evacuation routes in Hamilton, Bel Marin Keys, Black Point and Bahia. One occurrence within 0.1 miles of SR 37 in Bel Marin Keys. Most occurrences	Low; species is unlikely to occur along evacuation routes and work would not occur in suitable habitat. Potentially suitable nesting habitat is present in the vicinity of the evacuation routes. Refer to detailed analysis above for potential effects from noise

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
Melospiza melodia samuelis	San Pablo song sparrow	SSC	Permanent resident of tidal salt marshes of the San Pablo Bay. Forages and nests in emergent vegetation. The San Pablo subspecies occurs in salt marshes along the shores of San Pablo Bay, including Richmond and Pinole, southeast to Point San Pablo.	near Petaluma River near Black Point and Gallinas Creek 1.5 mi south of Hamilton (CDFW 2025). Low; suitable habitat occurs in wetlands adjacent to northeast evacuation routes. Infrequent observations documented along the Petaluma River near Black Point (CDFW 2025; Cornell Lab of Ornithology 2025).	generated by treatment activities on species while nesting. Low; species is unlikely to occur along evacuation routes and work would not occur in suitable habitat for nesting or foraging.
Rallus obsoletus obsoletus	California Ridgway's rail	FE, SE, FP	Resident in coastal salt marshes	Low; suitable nesting and foraging habitat occurs in wetlands within 0.1 mile of eastern evacuation routes in Hamilton, Bel Marin Keys, Black Point and Bahia. Infrequent observations documented along the Petaluma River near Black Point and Bahia (CDFW 2025; Cornell Lab of Ornithology 2025).	Low; species is unlikely to occur along evacuation routes and work would not occur in suitable habitat. Potentially suitable nesting habitat is present in the vicinity of the evacuation routes.
Sternula antillarum browni	California least tern	FE, SE	Nests on beaches, mudflats, and sand dunes	None; suitable nesting or foraging habitat does not occur. Least terns forage over open water and nest in coastal dunes.	None; work would not occur in suitable habitat and species is unlikely to occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				Flyovers possible, though no occurrences nearby.	
<i>Strix occidentalis caurina</i>	northern spotted owl	FT, ST	Dense canopies of mature and old-growth forests. Nests in tree hollows	Moderate; suitable nesting habitat likely to occur near eastern evacuation routes. Approximately 3 activity centers documented within 0.25 miles. Documented activity centers occur 0.5 mile south of Alameda De La Loma and 0.2 miles west of Fairway Dr. in Raphael Village, two activity centers approximately 0.4 miles south and west of Indian Valley Fire Road, one activity center 0.15 mile south of Novato Blvd west of San Marin. Evacuation routes within proximity to documented occurrences include Fairway Dr., Indian Valley Fire Rd., Indian Valley Rd., Wild Horse Valley Dr., Novato Blvd.	Low; work would occur outside nesting season (NSO-1), noise-generating activities would not occur within 0.25 miles of activity centers, or NSO protocol level surveys would be conducted (NSO-2). Treatment would focus on small trees and hazardous fuels; healthy, mature trees would not be removed. Removal of large hazard trees would occur with consultation with a qualified biologist (NSO-3). Dusky-footed woodrat nests would be retained as this species is an important prey item for NSO (NSO-4). NSO and key prey species would be included in environmental training for avoidance (ET-1).
<i>Bombus occidentalis</i>	western bumble bee	SC	Formerly widespread, now occurs in patchy areas of the coast ranges and Sierra Nevada wherever suitable nesting and overwintering habitat exists. Require wet/moist meadows	Low; suitable nesting and foraging habitat may be present near evacuation routes. However, the species has not been detected nearby in 60 years.	None; species can disperse and would be included in environmental training for avoidance (ET-1)

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			with abundant floral resources, roadside areas, and other areas containing forage species preferred by bumble bees .		
Danaus plexippus plexippus pop. 1	monarch - California overwintering population	FC	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Overwinter from November to February	None; no occurrences recorded within evacuation route treatment areas. Potentially suitable habitat is present in the form of floral resources within the project areas, but breeding not likely due to lack of suitable breeding habitat. No historic overwintering documented near evacuation routes.	None; can disperse from other areas. Species life stages and host plant (milkweed) would be included in environmental training for avoidance (ET-1).
Acipenser medirostris pop. 1	green sturgeon - southern DPS	FT, SSC	Fish that spawn in the Klamath and Eel River in Northern California and the Rogue River in Oregon belong to the Northern DPS (nDPS). Fish that spawn in the Sacramento, Feather, and Yuba River in	None; species does not occur in evacuation route treatment areas.	None; work would not occur in suitable habitat and species does not occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			California belong to the federally threatened southern DPS (sDPS). After hatching, larvae and juveniles migrate downstream toward the Sacramento-San Joaquin Delta and estuary. After rearing in the delta and estuary for several years, they move out to the ocean		
<i>Eucyclogobius newberryi</i>	tidewater goby	FE	Brackish water lagoons, estuaries, and marshes along the California coast	None; species does not occur in evacuation routes treatment areas.	None; work would not occur in suitable habitat and species does not occur.
<i>Oncorhynchus mykiss irideus</i> pop. 8	steelhead - central California coast DPS	FT, SSC	Occurs in fresh water, fast-flowing, highly oxygenated, clear, cool streams where riffles tend to predominate pools and small streams with high elevation headwaters close to the ocean that have no impassible barriers; spawning in	None; one occurrence in Adobe Creek near Petaluma (CDFW 2025). Species does not occur in evacuation route treatment areas.	None; work would not occur in suitable habitat and species does not occur.

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
			high-elevation headwaters.		
Pogonichthys macrolepidotus	Sacramento splittail	SSC	Confined to the Delta, Suisun Bay and associated marshes, slow moving rivers sections, and dead-end sloughs. Requires flooded vegetation for spawning and foraging for young.	None; one occurrence near mouth of Petaluma River (CDFW 2025). Species does not occur in evacuation route treatment areas.	None; work would not occur in suitable habitat and species does not occur.
Spirinchus thaleichthys pop. 2	longfin smelt - San Francisco Bay-Delta DPS	FE, ST	Spawns in fresh water in the upper end of the San Francisco Bay; occurs year-round in the Suisun Bay.	None; species does not occur in evacuation route treatment areas.	None; work would not occur in suitable habitat and species does not occur.
Reithrodontomys raviventris	salt-marsh harvest mouse	FE, SE, FP	Marshes and wetland edges	None; no documented occurrences of species within 3 miles of evacuation routes.	None; work would not occur in suitable habitat and species does not occur.
Actinemys marmorata	northwestern pond turtle	FC, SSC	Freshwater ponds and streams	Low; suitable habitat is unlikely to occur within evacuation route treatment areas, but may occur in ponds and streams that persist within dispersal distance of evacuation routes. Two occurrences documented in San Antonio north of evacuation routes. One occurrence near	Low; work would not occur in suitable habitat. Species would be included in environmental training for avoidance (ET-1).

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in treatment areas	Potential to be impacted by treatment
				Lakeville Highway east of Bahia and Black Point. One occurrence from 2017 documented in pond 0.3 mi from Ignacio Blvd west of Rafael Village (CDFW 2025).	
<i>Chelonia mydas</i>	green sea turtle	FT	Marine	None; suitable habitat does not occur within project area.	None; work would not occur in suitable habitat and species does not occur.

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.

FE	Federally Endangered	CR	California Rare
FT	Federally Threatened	CC	California State Candidate
FC	Federal Candidate	FP	Fully Protected
CE	California State Endangered	SSC	California State Species of Special Concern
CT	California State Threatened	CNPS	California Native Plant Society Ranks

Source: (CDFW 2025; CNPS 2025; CDFG 2003; Hickman 1993; Stebbins 2003)

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Cultural Resources and Tribal Cultural Resources¹⁴

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

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

Energy

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

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

Geology and Soils

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

Vehicle travel and access as well as operation of equipment would occur along existing paved roads. After the vegetation treatment is completed, erosion and topsoil loss through loss of root-

¹⁴ No tribal consultation requirement is associated with filing a notice of exemption per Assembly Bill 52 (PRC §21080.3.1.(b)).

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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 project area (USDA 2020). While some soil types present in work areas may be more prone to erosion than others, vegetation removal and cutting that maintain at least 70 percent of groundcover would not result in substantial erosion (Lang and McDonald 2005). Erosion control devices would be installed (GEO-1) in areas where erosion could occur. Pulling of large vegetation would not occur during rain events or when soils are saturated (GEO-3). Treatment methods associated with pretreatment prior to herbicide application, including hand pulling and cutting, or disposal of cut vegetation were approved in NOEs for previously approved roadways. Herbicide application would not directly result in any ground disturbance that would generate substantial erosion. Significant impacts related to erosion and loss of topsoil would not occur.

Greenhouse Gas Emissions

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

Vegetation thinning activities would involve manual and mechanical removal. Use of vehicles and equipment during these activities and vehicle travel to treatment areas would generate some greenhouse gas emissions (GHG). Herbicides would be applied by hand and would not directly generate GHG. The proposed project would not generate significant quantities of GHG emissions¹⁵. These processes are not quantified but would fluctuate during initial treatment and future maintenance. Due to the current higher fuel loads, it is anticipated that a net release of carbon from removal of vegetation and herbicide application could occur, at least in the near-term as the ecosystem fuel loads are restored closer to pre-fire suppression conditions and wildland fire risk is minimized while ingress and egress is improved. The fluctuation would be insignificant compared to overall carbon stock in Marin County. Significant greenhouse gas emission impacts would not occur.

Hazards and Hazardous Materials

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

Trucks, vehicles, and equipment are used for ongoing vegetation treatment activities and herbicide application 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 (i.e., herbicides) are properly

¹⁵ BAAQMD has established thresholds of significance for GHG emissions meant primarily for evaluating GHGs associated with land-use development or stationary-source projects, but the thresholds are not recommended for vegetation-management projects (Flores 2020).

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stored on-site and that any accidental releases of hazardous materials would be properly controlled and quickly cleaned up (HAZ-1).

The proposed project would comply with all herbicide regulations (HAZ-4), including 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). Off-road grading or other intense ground disturbance would not occur, ensuring that any potential existing contamination would not be disturbed and would not pose a risk to the environment or public.

Hydrology and Water Quality

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

Work areas would be accessed using existing paved roads adjacent to the work areas. Riparian woodlands may be encountered, any vegetation trimming, or thinning would be conducted by hand and alteration to, and deposition of debris avoided within the bed, channel, or bank of a waterway (SH-1). Some hand pulling could occur along roadways. The majority of the proposed manual and mechanical vegetation removal activities would not result in circumstances that would result in significant ground cover removal and, thus, significant erosion and subsequent sedimentation. For the rare instances where erosion could occur, erosion control measures would be implemented (GEO-1). Erosion and subsequent sedimentation of waterways would not occur.

Herbicides can impact water quality through stormwater runoff, leaching, drift, and accidental spills. Herbicides would be applied by hand using targeted application methods. Herbicide use would typically be conducted in tandem with other vegetation treatment methods (e.g., mechanical or manual hand thinning) or where other vegetation treatment methods (e.g., mechanical treatment) are not well suited for the treatment area. Herbicides would not be applied in quantities that would result in significant leaching or off-site movement. Broadcast or aerial application of herbicides would not occur. Herbicide mixing would occur away from waterways in areas devoid of vegetation, and only herbicides approved for use in aquatic environments would be applied by hand in riparian habitats (HAZ-5). Herbicide drift in public areas would be minimized by applying herbicides within 24 inches of vegetation, utilizing low nozzle pressures, and ceasing application when weather parameters exceed label specifications or when winds exceed 7 miles per hour (HAZ-4). Additionally, herbicides would not be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities (HAZ-4). Significant water quality impacts would not occur.

Land Use and Planning

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

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Potential for significant impact?

Implementation of vegetation treatment activities and herbicide application would not involve any new development or changes to land uses that could physically divide a community. The proposed project is consistent with the Novato Fire District Ordinance NO. 2022-1 (2022) and the Marin County Community Wildfire Protection Plan (2023). All activities conducted would comply with local land use regulations and policies.

Mineral Resources

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

Herbicide application and vegetation treatment activities would not result in the loss of availability of a known mineral resource because the work would occur along the evacuation routes and would not permanently alter any features. Herbicide application and vegetation clearance is intended to reduce non-native species density and cover and would not alter land uses, access, or subsurface areas that could impact mineral resources.

Noise

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

The proposed herbicide application and vegetation treatment activities would occur on weekdays between 7:30 am and 5:00 pm. This timeframe would conform with the appropriate noise ordinance (Marin County Noise Ordinance § 6.70.030; City of Novato Zoning Ordinance § 19.22.070) The noise ordinances limit construction activities to Monday through Friday 7:00 am to 6:00 pm and Saturday from 9:00 am to 5:00 pm., which the project activities would conform with. Targeted herbicide application would not utilize any equipment that would generate noise. Manual and mechanical vegetation treatment activities for the proposed project and pretreatment activities associated with the previously approved projects would progress along roadways, limiting noise in any one location to a few hours. Most recreationalists or motorists are only in a single area for a short duration and would be able to move away from noisy areas with little impact on their experience. Residents would experience noise associated with activities, but it is anticipated that activities in any one location would only occur for a few hours. A single residence may be able to hear equipment operating for a day as activities progress along the evacuation routes. Measures to minimize noise disruption to nearby neighbors would be implemented, as needed (NOI-1). Exceedances of local noise standards would not occur (given the short duration of noise generation in any one location and existing noise levels) and significant noise impacts would not occur.

Population and Housing

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

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

Public Services

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

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

Recreation

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

Herbicide application and vegetation treatments would occur along roadways near recreational areas throughout the Novato Zone, including MCOSD open space preserves, City of Novato-owned open spaces, Stafford Lake, and Olompali State Historic Park. Vegetation treatment activities and herbicide application would be performed typically within 10 feet of roadways but could occur 100 feet from road edges. Although unlikely due to the roadside nature of the treatments, treatment areas and trails that are accessible to the public may be closed for short durations during herbicide application and vegetation treatment activities. Some of the work areas are located near trails or fire roads where recreationalists could be located. Recreational trails would be unavailable if needed or flagged off during herbicide application and vegetation management activities, the treatments would be for a short duration in one area, typically for only a few hours to a few days. Signs would be posted at each end of herbicide applications areas and any intersecting trails notifying the public of the use of herbicides in recreational areas (HAZ-5). Ample recreational opportunities are available within and surrounding the Novato Zone (e.g., MCOSD open space preserves) that the few displaced recreationalists could use if discrete areas are unavailable due to herbicide application and vegetation management activities. The proposed project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

Transportation

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

Multiple crews would conduct herbicide application and vegetation treatment activities along roadways in a single day. Crew of up to 8 workers would likely be working at a single work area.

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An estimated 12 to 32 daily one-way vehicle trips could occur each day, which would not exceed the threshold of 110 trips per day¹⁶. If a separate herbicide application specialist is utilized, approximately two additional one-way vehicle trips would occur. The VMT associated with implementation of the proposed project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b). Chipping could be conducted as a method of vegetative debris disposal. Chipping would be performed away from roadways and would not be a hazard to passing motorists. No significant traffic impacts would occur.

Utilities and Service Systems

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

Biomass generated from vegetation removal activities may be processed using a chipper. As the vegetation grows back and follow up maintenance is conducted in future years, additional vegetative materials would be chipped and trucked away. Materials would be trucked to Marin Resource Recovery Center, West Marin Compost, or Redwood Landfill, which have a permitted capacity of 5,140 tons per day, or other appropriate processing facility, and would be able to accept the chipped material (CalRecycle 2025). Herbicide application would not generate any biomass that would be hauled away for disposal. No impact related to utilities and service systems would occur.

Wildfire

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

The evacuation routes are within the State Responsibility Area (SRA) and Local Responsibility Area (LRA) in moderate, high, and very high fire hazard severity zones (CALFIRE 2007/2008). The purpose of the proposed project is to reduce fuel loads along roadsides, which would reduce the spread and intensity of a wildfire, should one occur and to provide defensible space for fire suppression crews to safely defend communities. Fuel reduction crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). The proposed project would not impair an adopted emergency response plan or evacuation plan. The proposed project does not involve installation or maintenance of any infrastructure that could exacerbate fire risk. The proposed project does not involve intense ground disturbing activities that could result in downslope or downstream flooding or landslides should a wildfire occur. Impacts to people and structures from increased fire risk would not occur.

¹⁶ The Office of Planning and Research identifies a screening threshold for a small land-use project as a project that generates or attracts fewer than 110 trips per day. Projects that generate fewer than this threshold may be assumed to cause a less-than-significant transportation impact (OPR 2018). Although a vegetation treatment project is not a land use project, it is assumed that the screening threshold would still apply to the proposed project.

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