

**Notice of Exemption**

21-2023-120

<p>To: Office of Planning and Research P.O. Box 3044, Room 113 Sacramento, CA 95812-3044</p> <p>County Clerk County of: Marin Marin Civic Center 3501 Civic Center Dr., Suite 234 San Rafael, CA 94903</p>	<p>From: (Public Agency) Town of San Anselmo 525 San Anselmo Avenue San Anselmo, CA 95960</p>
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**FILED**

MAY 31 2023

SHELLY SCOTT  
MARIN COUNTY CLERK

By J. GILARDI Deputy

Project Title: Sorich Park and Hawthorne Canyon Prescribed Grazing

Project Applicant: Town of San Anselmo

Project Location – Specific: The proposed project would be conducted within Town of San Anselmo open space, which is owned and managed by the Town of San Anselmo.

Project Location – City:  
Town of San Anselmo

Project Location – County:  
Marin County

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

The purpose of the project would be to reduce fire fuels in open space areas through goat and sheep grazing, with the intention of reducing wildfire intensity and rate of spread in the event of ignition in the wildland or built environment. The project area is adjacent to occupied structures and abuts Marin County Open Space. Carefully managed and targeted grazing in high-vegetation open space areas has been shown to be an effective and efficient tool to meaningfully reduce the risk of wildfire. Targeted grazing reduces fire fuel load in open space areas that are adjacent to residential development. Grazing not only decreases the total fire fuel amount, but also decreases the overall height of underlying excessive vegetation, thereby improving suppression by reducing flame lengths, rate of fire spread, and fire severity. Herds can typically graze 1.5 acres per day. Manually removing this amount of fire fuel load in large areas of open space is impractical, inefficient, and cost prohibitive. By reducing fire fuels in the Town Open Space, the proposed project would also provide defensible space for fire suppression crews to safely defend the community from wildfire.

Name of Public Agency Approving Project: Town of San Anselmo

Name of Person or Agency Carrying Out Project: Town of San Anselmo

Exempt Status (Check one):

Ministerial (Sec. 21080(b)(1); 15268);

POSTED 5/31/23 TO 6/30/23

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, minor alterations to land for fire fuel reduction / fuel management activities and 15301, maintenance of existing public facilities or topographical features, involving negligible or no expansion of existing or former use.

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 CEQA Guidelines section 15301, Class 1 for Exiting Facilities. A CEQA Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The Project constitutes a minor alteration to the condition of land under CEQA Guidelines section 15304. The Project will provide protection for trees by wrapping certain tree trunks to prevent damage to bark. The Project utilizes a grazing herd composition that causes less damage to tree bark. The Project will not cause significant erosion or sedimentation of any waters, and will not result in the taking of an endangered, rare, or threatened plant or animal species. The scope of the proposed project as shown in the attached (Figure 1) is consistent with a minor alteration to the condition of the vegetation at discrete prescribed grazing sites.

In addition, a CEQA 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 Project will involve a minor alteration to open space land by removing excess fire fuel load vegetation through targeted and limited grazing. There is no expansion of existing or former use.

Additionally, no healthy, mature, scenic trees would be removed; no work would take place within sensitive habitat, including wetted wetlands or flowing 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  
Sean Condry, Town of San Anselmo

Area Code/Telephone/Extension  
415-258-4676

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: \_\_\_\_\_  
Signed by Lead Agency

Date: 5/30/23

Title: PUBLIC WORKS DIRECTOR

## Memorandum supporting NOE for Sorich Park and Hawthorne Canyon Prescribed Grazing

### **Categorical Exemption Summary**

The Town of San Anselmo's Sorich Park and Hawthorne Canyon Prescribed Grazing Project (project) is categorically exempt under CEQA Guidelines Section 15304, Class 4 for Minor Alterations to Land and CEQA Guidelines Section 15301 for Existing Facilities. A CEQA Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation that do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. The project constitutes a minor alteration to the condition of land under CEQA Guidelines section 15304. The project will provide protection for trees by wrapping certain tree trunks to prevent damage to bark. The project utilizes a grazing herd composition that causes less damage to tree bark. The project will not cause significant erosion or sedimentation of any waters and will not result in the taking of an endangered, rare, or threatened plant or animal species. The scope of the project as shown in the attached (Figure 1) is consistent with a minor alteration to the condition of the vegetation at discrete prescribed grazing sites.

In addition, a CEQA 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. This project will involve a minor alteration to open space land by removing excess fire fuel load vegetation through targeted and limited grazing. There is no expansion of existing or former use.

### **Project Description**

#### **Treatment Area**

The project would create fuel reduction zones in open spaces adjacent to communities within the Town of San Anselmo. The fuel reduction zones would be implemented across approximately 42 acres of land owned and managed by the Town of San Anselmo in the Sorich Park and Hawthorne Canyon areas. The residences directly adjacent to the work area and the broader nearby communities would benefit from the project treatments.

Grazing activities would occur within grassy areas containing light, flashing fuels, which are well suited for grazing for fuel management. Grazing would not occur in areas where slopes exceed 50 percent. Herds would be excluded from roadways, seasonal streams when actively flowing, and riparian zones.

#### **Treatment Method**

The project would involve transporting a herd of goats and sheep to the designated prescribed grazing sites. Site preparation would involve installation of a portable, solar-powered electric fence and water trough. The goats would be contained by the temporary fencing. The herder would determine the area to be grazed based on site conditions but would typically range from 1

to 2 acres at one time. The herd of 400 goats and sheep are not wether goats and are therefore less likely to eat bark or cause damage to trees.

### **Workers**

A herd of goats and sheep is typically managed by one herder. The herd is comprised of up to 400 animals as well as herding dogs and a livestock guardian dog. A goat herder would accompany each herd continuously to provide security and monitoring of the goats and temporary fence. The herder would live out of a trailer staged at a suitable location, such as a parking lot or unimproved road.

### **Site Access**

Prescribed grazing sites would be accessed using existing paved public and fire roads, and treatments along fire roads would be conducted entirely from existing roads. The herd may also gain access as it moves from Marin County Open Space property into Town Open Space lands.

### **Schedule and Duration**

Goats and sheep would be in one location until it is determined to be comprehensively and evenly grazed, typically 2 to 3 days, depending upon stocking rate, before being moved to a new location, at which time the temporary fence would be moved. Goat herds would be unloaded and loaded during business hours (between 8:00 am and 5:00 pm).

The initial grazing activities could begin as early as June 2, 2023 and take place over about 16 days for Sorich Park and 10 days in Hawthorne Canyon based on previous years' experience. All prescribed grazing sites are planned to be grazed annually.

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

The Town has developed specific design and implementation features for this project, which will be implemented as follows:

**Tree Wrapping** – Central Marin Fire Department will wrap trees in Sorich Park to protect tree bark against damage.

**Herd Composition** - Star Creek Land Stewards will use a new type of herd for this grazing season, which will provide less damaging fuel reduction. Last year the herd was comprised of solely wether goats (males castrated at a young age) whereas this year the herd will be mixed female goats and sheep, which are less likely to eat tree bark.

**Fencing Around Riparian Areas** - Town staff will flag riparian areas that should be avoided and the herder will arrange the electric fence accordingly to ensure that the herd does not enter the riparian and other selected areas.

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

**(a) Location:**

Sensitive habitats, including flowing watercourses and wetland areas would be avoided by vehicles operated by the herder and goat grazing. Goats would be excluded from flowing waterways and riparian areas designated by staff. Due to the scope and design of the proposed project, the proposed project would not adversely affect riparian habitats as the work would not affect shade over a waterway or species diversity within riparian corridors, therefore, exception (a) does not apply.

**(b) Cumulative Impact:**

Though the herd would visit the site repeatedly, cumulative impacts as defined in CEQA Guidelines Section 15300.2, would not occur. Ongoing maintenance of the prescribed grazing sites would be limited to the types of activities previously described under this project or the cumulative projects mentioned above, which would be performed periodically to maintain fuel reduction areas to help slow or stop the spread of wildfire. Desktop review and surveys for avoidance, as needed, are anticipated to be conducted for cumulative fuel treatment projects, which would avoid significant cumulative impacts on biological and cultural resources. The proposed grazing would not significantly impact special-status plants and nesting birds due to the type of activity proposed, existing disturbances at the prescribed grazing sites, and short-term nature of the grazing each year, where the grazed vegetation grows back, often in the next season. The proposed project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

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

All grazing activities proposed by this project, and future maintenance grazing are considered routine and are prevalent and typical throughout the County and Bay Area region. Sensitive flowing waterways would be avoided. Significant effects on special-status species would not occur. The proposed project would modify the vegetation, but the natural character would remain, and the aesthetic change would not be substantial. Therefore, there are no unusual circumstances associated with the proposed project or the environment in which it would be implemented would occur, and exception (c) does not apply.

**(d) Scenic Highways:**

No designated California State Scenic Highways occur in the vicinity of the work areas; therefore, exception (d) does not apply (Caltrans, 2021).

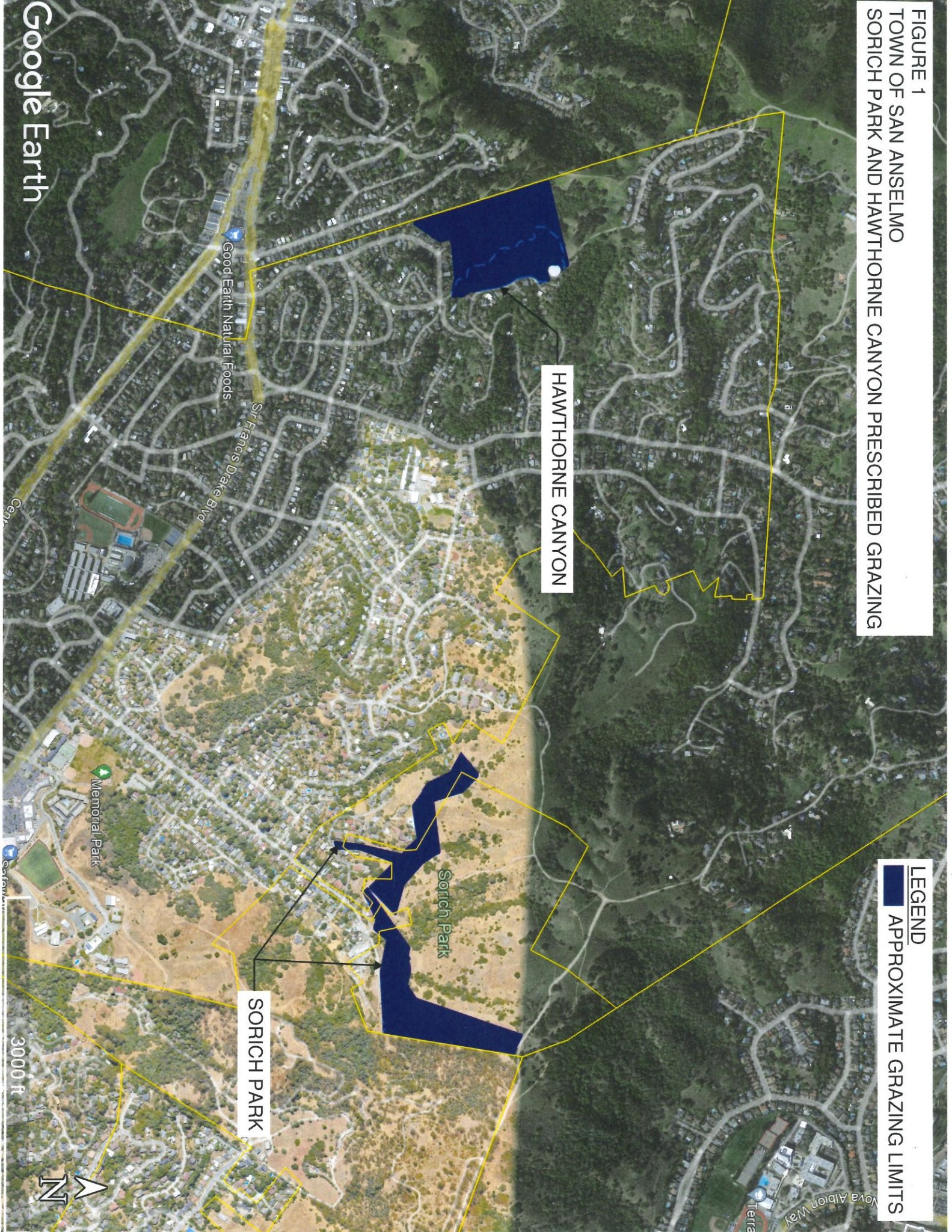
**(e) Hazardous Waste Sites:**

Per the current government database of hazardous waste sites at the time of this filing, there are no hazardous waste sites located within or adjacent to the work areas (SWRCB, 2021). No ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

**(f) Historical Resources:**

Prescribed grazing 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.

FIGURE 1  
TOWN OF SAN ANSELMO  
SORICH PARK AND HAWTHORNE CANYON PRESCRIBED GRAZING



LEGEND  
■ APPROXIMATE GRAZING LIMITS

SORICH PARK

HAWTHORNE CANYON

Google Earth

3000 ft

