

**Sotoyome Resource Conservation District  
Public Agency of the State of California**

**April 17, 2009**

**Addendum Number 2 to the  
Mitigated Negative Declaration for the  
Giant Reed (*Arundo donax*) Removal and Riparian Habitat Restoration in the  
Russian River Watershed**

**PURPOSE**

This addendum to the Mitigated Negative Declaration for the Giant Reed (*Arundo donax*) Removal and Riparian Habitat Restoration in the Russian River Watershed has been prepared to modify the membership of Russian River Team Arundo (RRTA). Section 15164 (b) of the California Environmental Quality Act (CEQA) Guidelines states that an Addendum to an adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 (calling for the preparation of subsequent EIR or Negative Declaration) apply.

This Mitigated Negative Declaration Addendum demonstrates that the environmental analysis, impacts, and mitigation requirements identified in the original declaration (SRCD 2004) remain substantively unchanged by the modification described herein, and supports the finding that the proposed activity does not raise any new issues and does not exceed the level of impacts identified in the previous Mitigated Negative Declaration.

**BACKGROUND**

Russian River Team Arundo (RRTA) is currently comprised of the Sotoyome Resource Conservation District (SRCD) and the Mendocino County Resource Conservation District (MCRCD). The mission of RRTA is to remove giant reed (*Arundo donax*) from the Russian River watershed and restore riparian habitat in invaded sites.

In accordance with CEQA (Public Resources Code Section 21000 et seq.), and the updated State CEQA Guidelines (Title 14, Chapter 3, Section 15000, et seq., California Code of Regulations), the Sotoyome Resource Conservation District, as the lead California Environmental Quality Act (CEQA) agency, prepared a Mitigated Negative Declaration and Notice of Determination, (State Clearinghouse Number 2004092059), approved by the Board of Directors on October 15, 2004.

Program implementation began in June of 2003, and approximately 1400 infested riparian acres of giant reed have been removed to date, with almost 500 acres completely controlled.

To date, weed removal has been conducted utilizing removal methods as laid out in the original Mitigated Negative Declaration and as modified in January 2007. These methods include above-ground biomass removal, using hand tools and mechanized equipment. Follow-up treatments include root removal, tarping, and/or the application of an imazapyr or glyphosate-based herbicide to cut and standing stems in order to kill the giant reed. Areas of infestation are then re-vegetated where appropriate, using locally collected native plants.

## **EVALUATION OF MODIFICATION**

The Initial Study and Mitigated Negative Declaration adopted on October 15, 2004 stated that Russian River Team Arundo (RRTA) was comprised of Circuit Rider Productions, Inc. (CRP) in collaboration with the Sotoyome Resource Conservation District (SRCD) and the Mendocino Resource Conservation District (MRCD). Changes in the nature of the partnership have necessitated the removal of CRP from the membership of RRTA. The SRCD, as the lead CEQA agency for this program, no longer has confidence in CRP's capacity to conform with the requirements of the Mitigated Negative Declaration and, as such, cannot continue to include them as part of this CEQA document.

## **EXPLANATION OF THE DECISION NOT TO PREPARE A SUBSEQUENT MITIGATED NEGATIVE DECLARATION**

CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate environmental documentation, if any, to be completed when there is a pre-existing adopted Mitigated Negative Declaration covering a project. SRCD provides the following findings pursuant to these criteria as required by CEQA Guidelines Section 15164 (e).

**CEQA Guidelines Section 15162 (a) states that when a Negative Declaration has been adopted for a project, no subsequent Environmental Impact Report (EIR) shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:**

- 1. Substantial changes are proposed in the project which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

**Discussion:** This modification to the SRCD's Mitigated Negative Declaration (State Clearinghouse number: 2004092059) will not change any of the methods, approaches, effects, or impacts of the Giant Reed (*Arundo donax*) Removal and Riparian Habitat Restoration in the Russian River Watershed program, nor will the severity of existing impacts or effects be increased. As such, no revisions to any previous negative declaration will be needed.

**2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

**Discussion:** The removal of CRP from the RRTA will not alter the circumstances under which the project is undertaken. The methods, approaches, and geographic locations of the project remain unchanged and no new effects or increases in effect severity will take place. CRP's omission from the membership will not alter the operation or management of the Giant Reed Removal program.

**3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted (October 2004), shows any of the following:**

**a. The project will have one or more significant effects not discussed in the negative declaration.**

**Discussion:** All significant effects discussed in the Mitigated Negative Declaration are still relevant to the current operation of the project and no new significant effects have been encountered in the project's operation since October 2004.

**b. Significant effects previously examined will be substantially more severe than shown in the negative declaration.**

**Discussion:** Previously examined significant effects have not proven to be more severe than shown in the Mitigated Negative Declaration as encountered in the project's operation since October 2004.

**c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or**

**Discussion:** Mitigation measures associated with project operations to date have not been found to be unfeasible, so there are no previously unfeasible measures that could be adopted that would substantially reduce one or more significant effects of the projects. As such, RRTA does not decline to accept any mitigation measures.

***d. Mitigation measures or alternatives which are considerably different from those analyzed in the negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.***

**Discussion:** Alternative mitigation measures considerably different from those analyzed in the Mitigated Negative Declaration have not been found to substantially reduce significant effects. As such, RRTA does not decline to adopt any mitigation measures.

## **CONCLUSION**

In preparing this Addendum, all of the potential impacts identified on the CEQA Environmental Checklist Form were considered. As removal of CRP from RRTA will not alter the methods, approaches, or geographic location of this project, it will not cause any additional impacts not identified or mitigated for in the original CEQA document.

In summary, the analysis concludes that none of the conditions described in Section 15162 of the CEQA Guidelines requiring preparation of a Subsequent Mitigated Negative Declaration have occurred. Thus, this Addendum to the adopted Mitigated Negative Declaration has been prepared in accordance with CEQA Guidelines, Section 15164. The removal of CRP from RRTA does not introduce new significant environmental effects, increase previously identified significant environmental effects, make previously infeasible mitigation measures feasible, or require adoption of infeasible mitigation measures. The removal of CRP from RRTA does not alter the findings in the original Initial Study or Mitigated Negative Declaration (SRCDD 2004).