PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CALVTP PEIR ◦
AUGUST 2022

Upper Los Angeles River Watershed *Arundo donax* Eradication Program

PREPARED FOR

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Cover photos: *Arundo donax* infestations in the Los Angeles River Watershed

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INTRODUCTION

Project Overview

The California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area (SRA) in California. It was designed for use by state, special district, and local agencies to accelerate vegetation treatment project approvals determined to be within the scope of the PEIR. To support this effort, the California Board of Forestry and Fire Protection (Board) developed CalVTP training modules, including example Project-Specific Analysis (PSA) documents to help guide state and local agencies in preparing their own PSAs under the CalVTP PEIR.

In partnership with parallel efforts occurring in the Tujunga Wash, Council for Watershed Health (CWH) developed a program to eradicate approximately 80 acres of Arundo (*Arundo donax;* common name giant reed) for the other remaining areas of the Upper Los Angeles River (ULAR) Watershed, as shown in Figure 1-1. Because Arundo spreads only by the dispersal of fragments downstream (no viable seed is produced), it is key to work from the top of a watershed towards the bottom. The ULAR subwatershed unit represents the headwaters of the larger Los Angeles River Watershed. This initiative will facilitate the development of programs that eradicate Arundo through use of the top-down treatment approach, generating long-term protection of water resources (CWH 2021).

Arundo is a non-native grass species that grows in dense stands. This highly invasive species uses between five and 10 times more water than native grass species in the same habitat and is a major fire hazard, with tall (25 to 30 feet) well-vented structures, and high biomass (up to 125 tons/acre). Arundo displaces native habitat and also blocks and diverts flows causing flood damage, modifying hydrologic processes and changing laterally unstable braided stream systems to single deep channel systems that do not favor native flora and fauna (CWH 2021).

The CWH intends to use this PSA and Addendum to provide California Environmental Quality Act (CEQA) compliance for the Coastal Conservancy to approve and implement this ULAR Watershed *Arundo donax* Eradication Program (Proposed Project).

CEQA Lead Agency and Proposed Project

Serving as the lead agency under CEQA, the Coastal Conservancy proposes to fund a portion of the vegetation treatments on approximately 80 acres of land identified for Arundo removal within the ULAR Watershed (Figure 1). The majority of Treatment Sites (i.e., locations where Arundo will be removed as part of the Proposed Project) are located in Los Angeles County with some Treatment Sites located in Ventura County and consist of a mix of Wildland-Urban Interface Fuel Reduction and Fuel Break treatment types, as described in Section 2.1 below. Treatment activities for the Proposed Project would consist of manual and herbicide treatments. These treatment types and treatment activities are consistent with those covered in the CalVTP PEIR. Ongoing maintenance of the proposed vegetation treatments would involve the same vegetation treatment activities as the original treatment (i.e., manual and herbicide treatments).

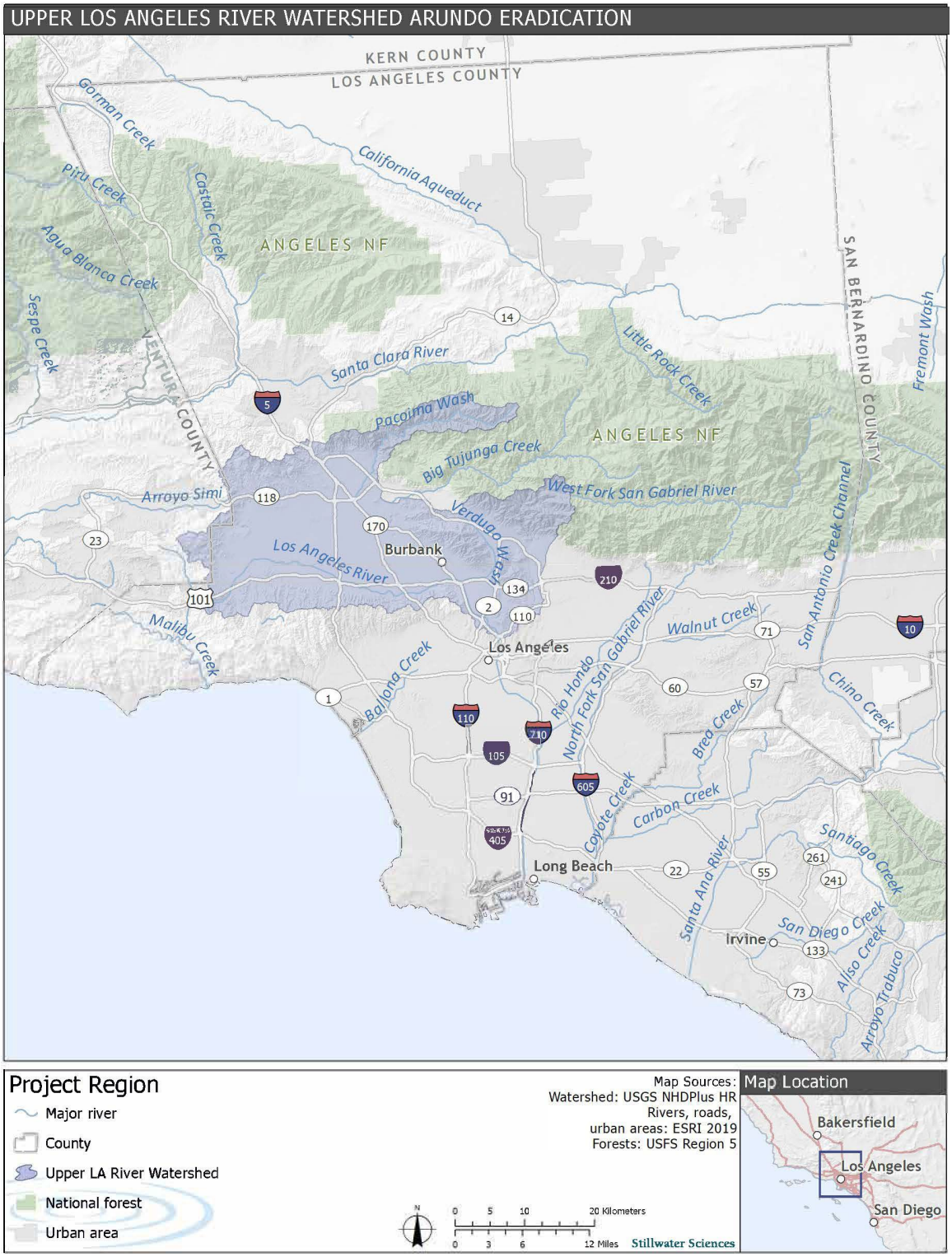

Figure 1. Project region.

The project boundaries for the ULAR Watershed *Arundo donax* Eradication Program lies mostly within the geographic boundaries of the upper Los Angeles River (514 mi^2). The Upper Tujunga Wash (153 mi^2) is not included within the project boundaries as an Arundo eradication program is currently being conducted by the National Forest Foundation in this area (with CEQA already completed). The project area includes both publicly and privately owned land within the ULAR Watershed with documented presence of Arundo stands as dense scattered clumps. Approximately 80 acres of Arundo will be controlled in the ULAR Watershed. The area has had several wildfires over the last five years, which highlights the need to remove and control Arundo before plant biomass accumulates again, creating a new fire risk. In addition, to help water savings, the removal of dead and dry stems of Arundo from the ULAR Watershed will prevent the accumulation of a fuel source that feeds wildfires and increases their intensity and destructive capacity.

Arundo stands will be treated using best management practices (BMPs) and will be controlled using aquatic approved herbicides by licensed contractors. An integrated pest management (IPM) process will be used that minimizes herbicide amounts and uses alternatives where appropriate. Most stands will be foliar treated with backpack sprayers, while canes would be bent and treated. All efforts will be made to minimize any impacts to other adjacent vegetation. Marking dye will be used to ensure treatment coverage and assure that there is no drift. At the request of property owners, small Arundo stands near roads or structures may be cut, hauled, and chipped at an off-site location, away from riparian areas and other vegetation, and cut stumps would be treated. Chipped Arundo biomass may be spread in the stand footprint, over disturbed areas (e.g., road edges, upland areas without native woody cover, or taken off site).

Purpose of This Document

This document serves as the PSA to evaluate whether the Proposed Project is within the scope of the CalVTP PEIR. As described above, the treatment types and treatment activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment project is within the scope of the CalVTP PEIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with State CEQA Guidelines Section 15168(c)(2).

Portions (73.33 acres in total) of the Proposed Project treatment areas extend outside of the CalVTP treatable landscape, and are dispersed in small sections of the treatment areas (Figure 2). This scattered array of acres is located outside of the CalVTP treatable landscape because the boundary of the CalVTP treatable landscape was digitally developed and the large scale of the area did not allow high mapping resolution. If the areas of the Proposed Project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the treatable landscape, the environmental analysis in the PEIR would be applicable.

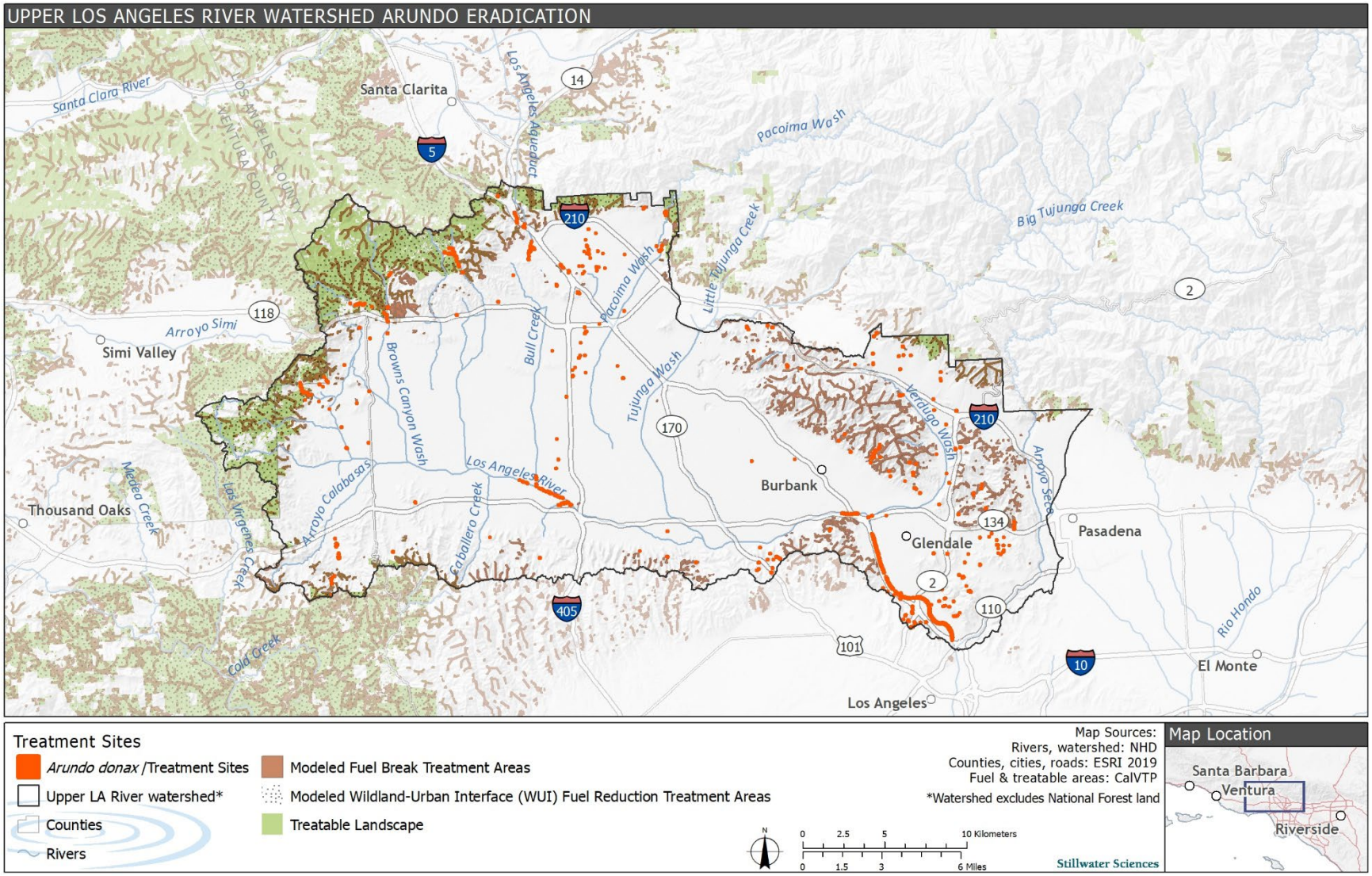

Figure 2. Treatment sites.

Per Section 15164 of the CEQA Guidelines, an Addendum to an Environmental Impact Report (EIR) is appropriate when a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the following conditions described in Section 15162 of the CEQA Guidelines calling for preparation of a subsequent EIR have occurred:

> *"(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
>
> *(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
> *(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 previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
>
> > *(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
> >
> > *(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
> >
> > *(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*
> >
> > *(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative."*

The proposed change to the project, as analyzed in the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. The PSA checklist (refer to Section 3, "Project-Specific Analysis/Addendum") includes the analysis to support an Addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the larger treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the CalVTP PEIR and/or would result in any new impacts that were not covered in the PEIR.

This document serves as both a PSA and an Addendum to the CalVTP PEIR to provide CEQA compliance for the proposed vegetation treatments within and outside of the treatable landscape. The project-specific mitigation monitoring and reporting program (MMRP), which identifies the CalVTP standard project requirements (SPRs) and mitigation measures (MMs) from the PEIR that are applicable to the Proposed Project, is presented in Appendix A. The SPRs identified in

the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

ENVIRONMENTAL CHECKLIST

Vegetation Treatment Project Information

1.	Project Title:	Upper Los Angeles River (ULAR) *Arundo donax* Eradication Program
2.	Project Proponent Name and Address:	Council for Watershed Health 177 E. Colorado Blvd, Suite 200 Pasadena, CA 91105
3.	Contact Person Information and Phone Number:	Jason Casanova, Director of Planning and Information Design 213-229-9945 cas@watershedhealth.org
4.	Project Location:	Upper Los Angeles River Watershed
5.	Total Area to be Treated (acres):	Approximately 80 acres

6. Description of Project:

Initial Treatment
The ULAR *Arundo donax* Eradication Program (Proposed Project) aims to improve overall river health and provide watershed benefits. Objectives for the vegetation treatments are to:

Reduce fire risk;

Increase water availability for riparian plant species;

Improve flood capacity; and
Improve wildlife habitat and conditions for native vegetation species.

Treatment activities would include manual treatments only and aquatic approved herbicides by licensed contractors. Herbicides proposed for use include glyphosate and imazapyr (for areas where glyphosate is prohibited). The project proponent will implement an integrated pest management (IPM) process that uses the least disturbing and impacting control method, minimizing herbicide amounts and uses alternatives, where appropriate. Herbicide application would be limited to ground-based methods, such as using a backpack sprayer or painting herbicide onto cut stems. No aerial spraying of herbicides would occur. Most of the treatment activities would not require equipment beyond hand tools and chainsaws. The following equipment would be used to implement the cut-and-daub/cut-and-spray treatment:

Cut-and-daub/cut-and-spray. One brush chipper and ~.6-ton box truck to haul away biomass (as needed).

As indicated in Section 2.5.1, Description of Treatment Types, of the CalVTP PEIR, *"While vegetation treatments under the CalVTP may not be able to slow or halt such extreme fires; most fires that occur within the state are not highly wind driven and the proposed vegetation treatments can help slow and suppress them. Vegetation treatments can also play a valuable role in containing the more extreme fires, when weather conditions shift, wind subsides, and fire intensity decreases. By implementing the proposed treatment types, the CalVTP would strategically modify portions of the landscape to reduce losses from and improve resiliency to wildfire. The proposed treatment types are:*

Wildland-Urban Interface Fuel Reduction: Located in WUI-designated areas, fuel reduction would generally consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands, and vice versa.

Fuel Breaks: In strategic locations, fuel breaks create zones of vegetation removal and ongoing maintenance, often in a linear layout, that support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. While fuel breaks can passively interrupt the path of a fire or halt or slow its progress, this is not the primary goal of constructing fuel breaks."

The majority of Treatment Sites for the Proposed Project consist of a mix of Wildland-Urban Interface Fuel Reduction and Fuel Break treatment types, as shown in Figure 1-2. Any of the initial treatment options described below could be used in the Wildland-Urban Interface Fuel Reduction and Fuel Break areas. The majority of the fuel type within the ULAR Watershed is Grass and Shrub Fuel Type, with some Tree Fuel Type scattered throughout. See Section 2.4.1 of the CalVTP PEIR for a description of fuel types.

Implementation of initial treatments would require a crew size of no more than 20 to 25 members, with a typical crew size ranging from three to 16 people, along with their associated vehicles to travel to and from the treatment areas. No road closures would be required for treatments, including treatments along roadsides. Treatments would begin in late fall of 2022, depending on equipment/contractor availability, weather conditions, and other restrictions as indicated in this Addendum and permit requirements, and continue through early spring 2023 to avoid the nesting bird season.

If Arundo is directly adjacent to a trail or bike path, where people may come into contact with the plant, these areas would be closed off the day of treatment for approximately 24 hours (giving the herbicide enough time to dry and dissipate). There are only a few areas identified for removal where this could occur: Hansen Dam Recreation Area trails; Sepulveda Basin (along the LA River path on the Balboa Lake side); and the Glendale Narrows bike path, as shown in Figure 3.

The following methods would be used to treat Arundo:

Contingency. This method is a variation on spray only. Herbicide is sprayed onto the regrowth of Arundo that has recently been scoured by floods or burned by fire. Under these conditions, much of the Arundo biomass and surrounding vegetation has been removed, which facilitates access, reduces the amount of regrowth that must be sprayed, and is the cheapest treatment method to implement.

Spray only. This method has been shown to be effective in southern California areas where leaving dying and dead Arundo stems is appropriate (e.g., in areas with low Arundo cover and/or where dead material will not increase fire risks) (Giessow 2010, Neill 2010). Approved herbicides would be sprayed directly onto standing Arundo stems via backpack sprayers. This method does not involve biomass removal.

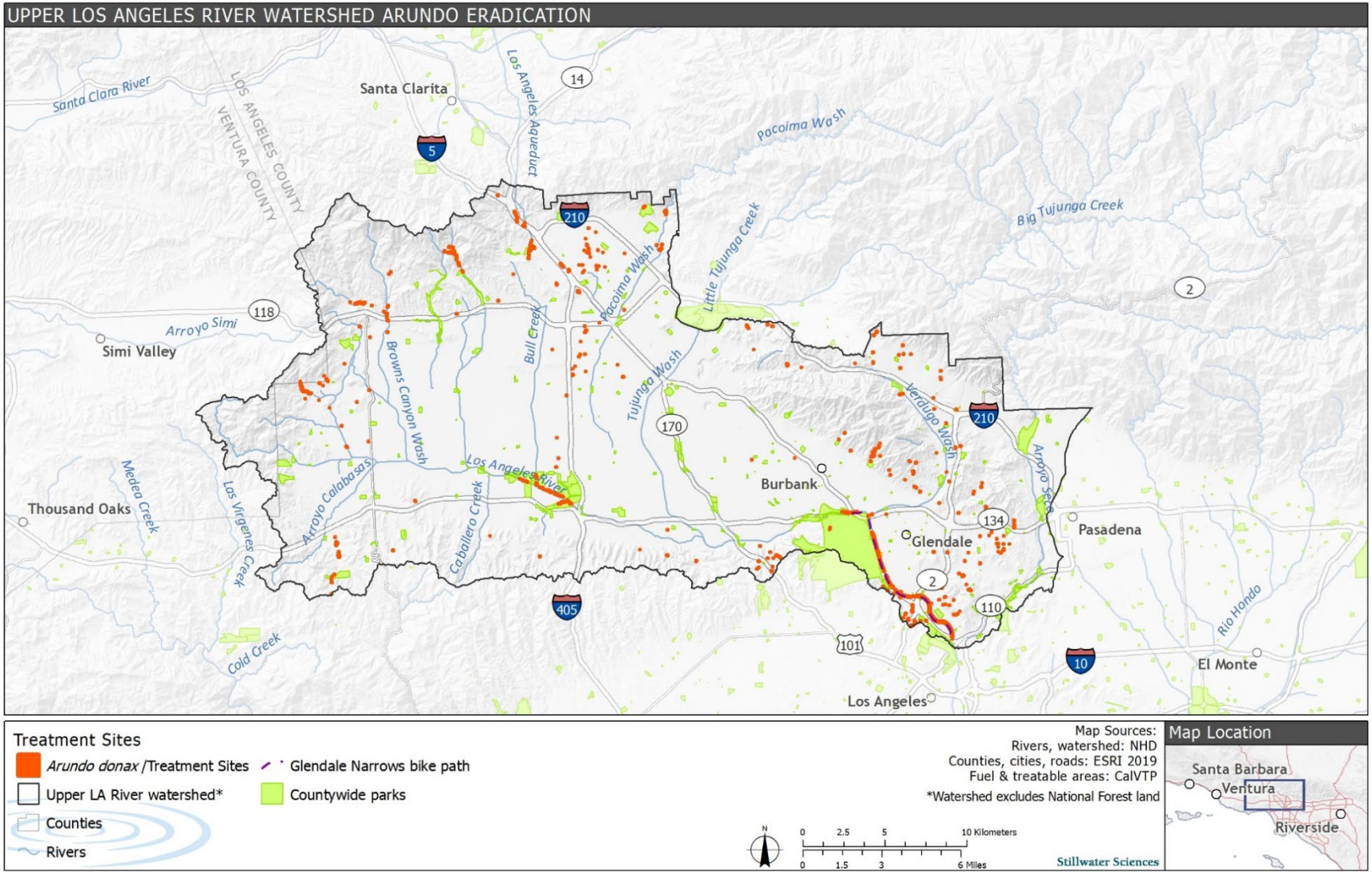

Figure 3. Recreational areas.

Bend-and-spray. This method requires minimal crews and equipment and minimizes the risk of herbicide application to non-target vegetation. As such, it is one of the most suitable methods for remotely located, small to moderately sized infestations, with interspersed native vegetation (Newhouser 2008, Coffman and Ambrose 2011). The bend-and-spray method involves at least one worker bending Arundo stems away from native vegetation and an herbicide applicator spraying the bent stems with an approved herbicide (Coffman and Ambrose 2011). The hook-and-spray method is a variation of this method that involves only one applicator, who hooks and bends Arundo stems with one hand and sprays the bent stems with herbicide with the other hand (Coffman and Ambrose 2011).

Cut-and-daub/cut-and-spray. Depending on the method with which Arundo stems are cut, this method can be appropriate in a wide variety of conditions. Both methods include cutting Arundo stems at or near the ground surface. Using cut-and-daub, cut Arundo stumps are immediately painted with an herbicide (Coffman and Ambrose 2011). Using cut-and-spray, cut Arundo stems are allowed to regrow for a season or two and then sprayed with herbicide. Arundo stems can be cut with a chainsaw or hand tools. Because cut *Arund*o stems can sprout into new plants, cut stems would not be allowed to fall in or near waterways (Coffman and Ambrose 2011).

Manual Only. Approximately 5 to 10 percent Arundo Treatment Sites could be treated with manual tools only without the use of herbicide where a) there is a strong anti-herbicide presence and b) it may be slightly feasible to remove all the rhizomes manually only if dealing with smaller single clumps. Normally, mechanical work would only be performed on initial treatment to reduce the amount of biomass (as requested by the property owner due to wildfire or safety issues).

No native woody vegetation would be treated as part of this Project. Marking dye would be used to ensure coverage and assure that there is no drift. Small Arundo stands near roads or structures may be cut, hauled, and chipped. Cut stumps would be treated. Chipped Arundo biomass may be spread in the stand footprint, over disturbed areas (road edges, upland areas without native woody cover, or taken off site). Additional target non-natives may also be treated at the biologist's/project lead's discretion (typically tamarisk, palms, castor bean, etc.). Standing water will not be diverted or entered.

All work would be performed by crews on foot. Treatments would occur with backpack sprayers (as indicated above). Cutting of Arundo canes would be handled with chainsaws. Arundo would be hauled on foot to disturbed areas outside of riparian habitat. Cut and hauled Arundo would then be chipped. Chippers would operate in disturbed areas (cleared parking areas, road shoulders, etc.). Chipped Arundo mulch would be spread in disturbed areas. Chippers would not enter areas with native riparian vegetation. No new roads, access, or staging areas will be cleared or created for the project. No mowers, excavators, or other mechanized equipment would be used in completing Project work.

No impacts to sensitive resources would occur. The project would enhance native riparian habitat. No ground disturbance would occur, only control of non-native vegetation (primarily *Arundo donax*).

No permanent impacts to bed, bank, or channel of the river riparian habitat would occur. No soil disturbance or clearing of native woody vegetation would occur. Temporary impacts are related to control of the target invasive non-native vegetation (the control of the target non-native vegetation itself). Most work is foliar treatment of Arundo in place. There the Arundo would be chipped and spread over previously disturbed areas (non-riparian, developed open areas- yards, laydown areas, etc.) with no plant cover or annual non-native vegetation cover as mulch.

Arundo removal on identified private property would be conducted at the request of private property owners. Small Arundo stands near roads or structures may be cut, hauled, and chipped at an off-site location, away from riparian areas and other vegetation, and cut stumps would be treated. Chipped Arundo biomass may be spread in the stand footprint, over disturbed areas (e.g., road edges, upland areas without native woody cover, or taken off site). A chipper and truck would be used to haul and chip these small Arundo strands if required by the property owner due to wildfire hazard (directly adjacent to a structure or if required by the USDA Forest Service). It is estimated that approximately five percent of Arundo biomass would need to be hauled away to local landfills.

Treatment Types

- ☒ Wildland-Urban Interface Fuel Reduction
- ☒ Fuel Break
- ☐ Ecological Restoration

Treatment Activities

- ☐ Prescribed Burning (Broadcast), _____ acres
- ☐ Prescribed Burning (Pile Burning)
- ☐ Mechanical Treatment, _____ acres
- ☒ Manual Treatment, 4 to 8 acres
- ☐ Prescribed Herbivory, _____ acres
- ☒ Herbicide Application, 72 to 76 acres

Fuel Type

- ☒ Grass Fuel Type
- ☒ Shrub Fuel Type
- ☒ Tree Fuel Type

Treatment Maintenance

Maintenance/retreatment. Arundo maintenance would require approximately five years of follow-up treatments or maintenance to ensure that all Arundo biomass is killed (Giessow 2010, Neill 2010). Since retreatment is done on previously cut and/or treated Arundo, it would generally consist solely of herbicide application twice annually, after canes regrow to approximately six feet, for approximately five years.

Treatment Types

☒ Wildland-Urban Interface Fuel Reduction
☒ Fuel Break
☐ Ecological Restoration

Treatment Activities

☐ Prescribed Burning (Broadcast), _____ acres
☐ Prescribed Burning (Pile Burning)
☐ Mechanical Treatment, _____ acres
☐ Manual Treatment, 4 to 8 acres
☐ Prescribed Herbivory, _____ acres
☒ Herbicide Application, 72 to 76 acres

Fuel Type

☒ Grass Fuel Type
☒ Shrub Fuel Type
☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

Prior to implementing a maintenance treatment, the project proponent will verify that the expected site conditions as described in the PSA are present in the treatment area. As time passes, the continued relevance of the PSA will be considered by the project proponent in light of potentially changed conditions or circumstances. Where the project proponent determines the PSA is no longer sufficiently relevant, the project proponent will determine whether a new PSA or other environmental analysis is warranted.

In addition to verifying that the PSA continues to provide relevant CEQA coverage for treatment maintenance, the project proponent will update the PSA at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA or the latest PSA update. For example, the project proponent may conduct a reconnaissance survey to verify conditions are substantially similar to those anticipated in the PSA. Updated information should be documented.

7. Regional Setting and Surrounding Land Uses:

The Upper Los Angeles River (ULAR) Watershed encompasses 514 square miles and is located primarily in LA County, with a small portion of the western watershed in Ventura County. The ULAR Watershed project area is bordered by the Santa Susana and San Gabriel Mountains to the north; Santa Monica Mountains and urban land uses associated with the city of Los Angeles to the south; the Arroyo Seco (an upper tributary of the ULAR), the city of Pasadena and the Angeles National Forest to the east; and Simi Hills to the west.

8. Other Public Agencies Whose Approval is Required:

California Department of Fish and Wildlife Section 1602 Streambed Alteration Agreement

County of Los Angeles Significant Ecological Area (SEA) Ordinance

Coastal Act Compliance

☒ The Proposed Project is NOT within the Coastal Zone

☐ The Proposed Project is within the Coastal Zone (*check one of the following boxes*)

- ☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable
- ☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

9. **Native American Consultation**. *For treatment projects that are within the scope of the CalVTP PEIR, AB 52 consultation for AB 52 compliance has been completed. The Board of Forestry and Fire Protection conducted consultation pursuant to Public Resources Code section 21080.3.1 during preparation of the PEIR.*

Pursuant to CalVTP SPR CUL-2, an updated Native American contact list was received from the Native American Heritage Commission (NAHC). On July 22, 2022, consultation letters were sent via email and hardcopies were mailed on July 27, 2022 to the following tribes: Fernandeño Tataviam Band of Mission Indians, Gabrieleno Band of Mission Indians of California, Kizh Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino Tongva Indians of California, Gabrielino-Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe, Gabrielino-Tongva Tribe (Nation), Juaneno Band of Mission Indians, Acjachemen Nation, Juaneno Band of Mission Indians, Acjachemen Nation, Santa Ynez Band of Chumash Indians, and Twenty-Nine Palms Band of Mission Indians. The Fernandeno Tataviam Band of Mission Indians responded with a request for consultation on August 5, 2022, which was held on August 24, 2022.. In addition, on March 31, 2022, emails inviting the Gabrielino-Tongva, Chumash and the Fernandeño Tataviam Band of Mission Indians tribes to consult were sent by the Council for Watershed Health, the project proponent. A response was received from Fernandeño Tataviam Band of Mission Indians and two meetings were held on April 7, 2022 and April 19, 2022. Project specific implementation details were added to specific SPRs and mitigation measures as requested by the Fernandeño Tataviam Band of Mission Indians. As of this writing, no other tribes have responded.

DETERMINATION

On the basis of this PSA and Addendum to the PEIR and the substantial evidence supporting it:

☒ I find that all of the effects of the Proposed Project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The Proposed Project within the CalVTP treatable landscape is, therefore, WITHIN THE SCOPE of the CalVTP PEIR. For the Proposed Project areas outside of the CalVTP treatable landscape, no new circumstances have occurred, nor has any new information been identified requiring new analysis or verification. Project changes would not result in any new or substantially more severe significant impacts. **NO ADDITIONAL CEQA DOCUMENTATION** beyond this PSA and Addendum to the PEIR is required.

☒ I find that treatments in Proposed Project areas outside the CalVTP treatable landscape do not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, this **ADDENDUM** is adopted to address the project areas outside geographic extent presented in the PEIR.

☐ I find that the Proposed Project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A **NEGATIVE DECLARATION** will be prepared.

☐ I find that the Proposed Project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the Proposed Project or additional mitigation measures have been agreed to by the project partners that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the Proposed Project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Signature Amy Hutzel Date 10/19/2022

Printed Name: Amy Hutzel Title: Executive Officer