

15 Alternatives

CEQA Guidelines Section 15126.6(a) requires that a draft EIR must describe a reasonable range of alternatives to the project or project location that could feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental impacts of the proposed project. This chapter summarizes the analysis of alternative programs for the San Mateo County Mosquito and Vector Control District's IMVMP Plan. It is based on Appendix E, Alternatives Analysis Report, prepared by the Napa County Mosquito Abatement District, which is an analysis of the potential components or tools for vector control. Following the discussion of alternative tools eliminated from the Program and the No Program and Do Nothing Program, this chapter explains the alternative programs based on adjustments to some of the components.

15.1 Alternatives Analysis and Screening Process

The District undertakes mosquito and/or vector control activities through its Program to control the following vectors of disease and/ or discomfort in the Program Area: mosquitoes, rats, mice, ticks, yellow jackets, other stinging/biting insects such as biting flies and mites, bats and nuisance urban wildlife including opossums, raccoons, and skunks.

The Proposed Program's specific objectives are as follows.

- > Protect public health by reducing the potential for human and animal disease caused by mosquitoes and other vectors
- > Protect public health by reducing the potential for human and animal discomfort or injury from mosquitoes and other vectors
- > Accomplish effective, reasonably cost-efficient and environmentally sound mosquito and vector management and control by means of:
 - Monitoring and surveying for vector presence, abundance, disease prevalence in vectors, human and animal contact or potential for human and animal contact
 - Monitoring and surveying for vector-borne diseases and their antecedent factors that initiate and/or amplify disease
 - Establishing treatment criteria; and
 - Appropriately selecting appropriate tools from a wide range of Program tools or components to address a wide range of mosquitoes and other vectors and implementing them to protect public health and safety.

Most of the relevant vectors are quite mobile and cause the greatest hazard or discomfort at a distance from where they breed. Each potential vector has a unique life cycle, and most of them occupy several types of habitats. To effectively control them, an IMVMP must be employed. District policy is to identify those species that are currently vectors, to recommend and implement techniques for their prevention and control, and to anticipate and minimize any new interactions between vectors and humans.

The District has a well-defined process for selecting tools to be used in mosquito and/or vector control (i.e., Program components). The District has evaluated a variety of tools for their effectiveness in meeting the objectives listed above (see Appendix E). The criteria used for determining the feasibility or viability and ranking of reasonable tools are listed below:

- > **Criterion 1.** The District uses known effective tools to manage vector species that have developed breeding populations in the state.
- > **Criterion 2.** The District does not use experimental or hypothetically effective tools.
- > **Criterion 3.** Given equal efficacy and operational constraints, the District will use the least environmentally disruptive tool in its control Program.

15.2 Alternatives Considered but Eliminated

CEQA Guidelines Section 15126.6(c) requires that the draft EIR explain briefly why other alternatives to the Proposed Program were rejected. Appendix E describes the tools that were considered and then, subsequently, eliminated from further consideration for inclusion in NCMAD's Proposed Program. Conclusions there were adapted for use by the District. The District agrees with the determination that of the potential tools evaluated in Appendix E, the following were not immediately available or viable for use in its IMVMP: biological control pathogens (viruses), biological control (parasites), biological control plants; inundative releases (predators), inundative releases (parasites), mass trapping, regulatory control, and repellants. The first four tools have been withdrawn from further evaluation as they are not commercially available for the District to use. Therefore, they are not viable tools. Mass trapping is not viable for the following reasons: (1) the staff time and equipment required are exceptionally cost prohibitive, and (2) depletion trapping of vectors, especially invertebrate vectors, has been shown to be highly ineffective. The use of repellants also has limitations. Two other tools, attract and kill and regulatory control, have little or no substantial effectiveness in managing large vector populations. Further analysis of one attract-and-kill formulation, the new AllClear ATSB, is needed prior to using it for mosquito control, so it was excluded from the Proposed Program. Further analysis of the other forms of attract-and-kill and of regulatory control was deemed unnecessary.

In summary, the District determined that of the potential tools, the following 8 methods were not immediately available or viable for use in its IMVMP: biological control pathogens (viruses), biological control (parasites), biological control plants, mass trapping, attract and kill, inundative releases, regulatory control, and repellants.

These alternative tools are identified and evaluated in the NCMAD Alternatives Analysis Report (Appendix E) and then summarized below in this PEIR. They include the following:

- > Biological Control Pathogens (viruses) is deemed infeasible as this method is not commercially available in California and currently has many efficacy-related issues.
- > Biological Control Parasites is deemed infeasible as this method is not commercially available in California. Research on the use of parasites for mosquito control has also shown several limitations related to efficacy.
- > Mass Trapping is not considered by the District to be a practical, effective, reliable method of controlling vector populations. Can be very expensive and time consuming (i.e., labor intensive) and is not effective.
- > Attract and Kill is not considered by the District to be a practical, effective, reliable, method of controlling vector populations. The technology for both mosquitoes and yellow jackets is limited, and effectiveness is either not obtained or is inconsistent. Nontarget insects can be impacted. The District is aware of one commercially available Attractive Toxic Sugar Bait product, Terminix® AllClear. The District still needs to operationally test this material, as well as other potential ATSBs, to determine those circumstances where their use may be effective while also having little or no nontarget species impacts.
- > Inundative Releases of Parasites is not considered by the District to be a practical or currently feasible method of controlling vector populations. They are not commercially available and remain experimental at this time.

- > *Inundative Releases of Predators*, either sterilized or genetically altered organisms, is not considered by the District to be a practical or a currently feasible method of controlling vector populations. Genetically modified vectors are still experimental. They are also not commercially available at this time.
- > *Regulatory Control* is not considered feasible because adoption of regulations is lengthy, time intensive, expensive, and uncertain as to the regulatory outcome. This approach is not focused sufficiently on control of existing populations. Moreover, regulatory controls are dependent upon state and federal agencies to initiate and implement and, thus, this approach cannot assure that any Program objectives would be achieved.
- > *Repellants*, although effective for small-scale use by humans and animals, are not part of the overall Program control strategy because they merely displace the problem and do not reduce the mosquito population in an area.

15.3 No Program

CEQA Guidelines Section 15126.6(a) requires analysis of a no project alternative in the draft EIR. No Project is defined as what would reasonably be expected to occur in the foreseeable future, based on current plans and consistent with available infrastructure and community services, if the project was not approved and implemented. Under CEQA, “when the project is a continuation or revision of an existing land use or regulatory plan, policy of operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future” (Section 15126.6 (e)(3)(a)). Technically, the Proposed Program would only be those activities not part of the current Program, i.e., the new activities not previously conducted. Therefore, the No Program Alternative would be a continuation of the Existing Program without the additional enhancements under the Surveillance, Physical Control, Vegetation Management, Chemical Control, and Nonchemical Control/Trapping Components. For the District, the No Program is to continue current nonchemical and chemical treatment activities conducted in whole or in part since 2002 and to not introduce other herbicide, insecticide, and rodenticide products or surveillance and application methods (fixed-wing aircraft, heavy equipment) to those currently in use. There would be no live trapping of raccoons and skunks.

Because the Program enhancements are designed to address future problems that may or may not occur, and in the interest of transparency, the District decided that the text of the PEIR would address the environmental impacts of both the existing and future Proposed Program components in a cumulative and comprehensive manner even though it is only required by CEQA to evaluate the new/future activities. Furthermore, the USACE requested preparation of an EIR to renew its 5-year regional permit; and the public has expressed an interest in current practices. Therefore, the PEIR not only evaluates the relatively few new activities (required) but also the existing activities (optional) together, based on current information and CEQA Guidelines for the comprehensive Program. Also, while it was acceptable to evaluate chemical use based on the product label in 2002 (wherein applications to label requirements were determined to not have significant impacts), today the evaluation of chemical use must consider the context in which the pesticide product is used. By evaluating the combined impacts of both existing and proposed future activities, the Draft PEIR does not limit the environmental impact analyses to just the new activities, which ensures potential impacts from the entire Program are not overlooked; instead, both existing and proposed surveillance and control measures in the District’s IMVMP are evaluated.

This section identifies the impacts associated only with the current Program activities in order to summarize the impacts of the No Program Alternative and then compares those impacts separately from future activities as proposed. It then evaluates whether impacts would be substantially reduced under the No Program (in comparison to future activities) and whether the Program objectives can be met only with the current Program.

15.3.1 Surveillance

The Existing Program includes surveillance activities for larval and adult mosquitoes, ticks, yellow jacket and other wasps, rodents, and other vectors. Surveillance directs control to where it is needed and then helps to assess the success of control afterward so that it can be adjusted if needed. All of the impacts to land uses, resources, and health are either “no impact” or “less-than-significant” impact.

For the Proposed Program, no new activities are proposed for the future for mosquitoes and other invertebrates. For vectors other than rodents, the District may enhance its surveillance in the future by testing for the presence of murine typhus by collecting ground squirrels, opossums, skunks, and their fleas in the same manner as for wild rodents under the Existing Program. This new testing would not result in any potentially significant impacts.

15.3.2 Physical Control

For the Existing Program, physical control activities for mosquitoes and for other vertebrate vectors are primarily part of the current Program. All of the impacts of the existing Physical Control component were found to have either “no impact” or a “less-than-significant” impact.

For the Proposed Program, the District may enhance the physical control component by adding use of the following new measures under the Proposed Program:

- > Small ditches formed by a shovel or similar tool that is up to 18 inches wide and 18 inches deep to enhance water circulation
- > Rotary ditching, which involves the construction of shallow ditches usually 4 feet wide and 2 to 3 feet deep, using high-speed rotary equipment with the spoil material evenly distributed in a very thin layer over the marsh surface, with limitations on its use based on the size of ditch needed, soil types, access, adjacent terrain, and vegetation present
- > Rotational impoundment management (RIM), which is a formal strategy of impoundment management that achieves multipurpose management by allowing the impoundment to (1) control salt marsh mosquito production from the marsh through means other than insecticides, (2) promote survival and revegetation by maintaining open periods and sufficiently low water levels during the summer flooding period, and (3) allow marine life to use the previously unavailable impounded high marsh
- > Excavation using a low-ground-pressure excavator

These additional measures rely on the use of existing equipment and the potential use of an additional piece of heavy equipment (tractor). As above, prior to the use of any of these techniques, the District would: (1) consult with the resource agencies, and (2) apply for and secure applicable environmental review permits and conduct necessary additional environmental review if required. All of the impacts of enhancing the Physical Control component as proposed were found to have either “no impact” or a “less-than-significant” impact.

15.3.3 Vegetation Management

The Existing Program for vegetation management involves mechanical means for vegetation removal or thinning, water management for vegetation control, and the use of some herbicides for spot control of actively growing vegetation to address Bair Island’s invasive *Spartina* involving the following active ingredients: glyphosate, imazapyr, lecithin/methyl esters of fatty acids/alcohol ethoxylate combined, and polymeric colorant. All of the impacts to of the existing Vegetation Management Component were found to have either “no impact” or a “less-than-significant” impact.

For the Proposed Program, the existing physical management techniques could be expanded with the use of an additional piece of heavy equipment. Also, additional herbicide product formulations with the following active ingredients are under consideration for future use: dithiopyr, oryzalin, triclopyr, dimethyl

tetrachloroterephthalate (DCPA), polymeric colorant, modified vegetable oil, benefin and oryzalin, sulfometuron methyl, and alkyl phenol ethoxylate/isopropanol/ fatty acids combined. All of the impacts of enhancing the Vegetation Management Component were found to have either “no impact” or a “less-than-significant” impact.

15.3.4 Biological Control

Bacterial pathogens in current use as larvicides are evaluated under the Chemical Control Component of the Program. The only mosquito predator that is used in the current Program is mosquitofish (*Gambusia affinis*), and it would be used in the future as well. All of the impacts of the existing Biological Control component were found to have either “no impact” or a “less-than-significant” impact.

No enhancements or changes to the Biological Control component are proposed.

15.3.5 Chemical Control

The Existing Program includes primarily nonpersistent selective insecticides to directly reduce populations of larval and adult mosquitoes and other invertebrate threats (ticks and wasps) to public health. It includes also the use of rodenticides to control rats and mice.

The types of chemicals (product formulations) in current use by active ingredient are the following:

- > Larvicides: *Bacillus thuringiensis israelensis* (Bti), *Bacillus sphaericus* (Bs) with Bti (combined), Bs, spinosad, methoprene, refined petroleum distillate, mineral oil, and aliphatic petroleum hydrocarbons.
- > Adulticides: pyrethrins and piperonyl butoxide (PBO), resmethrin and PBO, sumithrin and PBO, deltamethrin, and etofenprox
- > Yellow Jacket Wasp: permethrin; deltamethrin; pyrethrins and PBO; tetramethrin/permethrin/ PBO combined; prallethrin and lambda-cyhalothrin, d-trans allethrin and phenothrin
- > Tick: deltamethrin
- > Rat: bromadiolone, diphacinone, bromethalin, and brodifacoum

The existing use of chemical controls containing these active ingredients by the District has mostly no impact or a less-than-significant impact with one exception. One air quality impact (objectionable odors) is potentially significant but can be mitigated to less than significant.

For the Proposed Program, types of chemicals under consideration for future use by active ingredient are:

- > Adulticides: permethrin and PBO, naled, pyrethrins and PBO, prallethrin and PBO
- > Yellow Jacket Wasp: potassium salts of fatty acids; esfenvalerate; resmethrin; and etofenprox/
- > Tick: permethrin and pyrethrin
- > Rat: cholecalciferol, difethialone, sodium nitrate and sulfur, chlorophacinone, sodium nitrate and cholecalciferol

The use of insecticides containing these active ingredients and adjuvants by the District would have mostly no impact or a less-than-significant impact with two exceptions. One air quality impact (objectionable odors) associated with both existing and future chemical use could be significant but can be mitigated to less than significant. The other impact is to surface water quality from the future use of naled (i.e., naled’s breakdown product), and that impact is significant and unavoidable. See Section 15.5 for further explanation of these two impacts.

The Existing Program uses a variety of ground surveillance and application equipment, water surveillance and application equipment, and aerial application equipment using only helicopters to treat large source areas of 100 to 3,000 acres by contracting with an aerial application service. The future Program could

add fixed-wing aircraft to aerial application equipment for adulticide applications in large areas if needed. The impact of fixed-wing aircraft use is similar to helicopter use. The additional aircraft does not trigger any additional impacts to air quality, GHG emissions, or noise impacts or other resources.

15.3.6 Other Nonchemical Control/Trapping

The trapping of rodents and other nuisance wildlife (e.g., skunks, raccoons, and opossums) by a private licensed pest control operator occurs under the Existing Program and would occur in the future in the same manner with one addition. For the Proposed Program, the District may set a live trap for raccoons and skunks and take responsibility for the trapped animal. All of the impacts were determined to be no impact or less-than-significant impact for both the existing and proposed Other Nonchemical/Trapping Component.

15.3.7 Public Education

Public education activities under the Existing Program would continue under the Proposed Program. No impact would occur to any of the resources or to human and ecological health from public education.

15.3.8 Conclusions

The No Program Alternative has all of the same impacts as the Proposed Program (existing plus future activities) with one exception. Continuing the Existing Program without enhancements does not have the significant and unavoidable impact to surface water quality associated with the future use of naled. Naled is effective against other mosquitoes that may become resistant to the pyrethrins and pyrethroids. Naled has been used successfully in Florida in 2016 to treat the mosquito *Aedes aegypti* that was infected with the Zika virus. Therefore, in order to meet the Program objectives of reducing the potential for human and animal disease, and maintaining effectiveness by having a wide range of tools to address a wide range of mosquitoes and other vectors, the District needs this chemical option in its Proposed Program. As described in the District's IMVMP, naled would only be used to control adult mosquitoes exhibiting resistance to pyrethrins and pyrethroids.

While the remainder of the impacts from the No Program Alternative and the overall Proposed Program are the same, the No Program Alternative would not equally achieve the Program objective of having an effective mosquito and vector management program because it would eliminate the enhancements designed to futureproof the Program. The No Program Alternative involves no change, which means that the District's program would not evolve. Over time, the District's Program would involve the use of old pesticides and other chemical controls which either are no longer available, have been replaced with newly developed chemicals, or are no longer effective due to resistance. The District's other Program components (surveillance, biological, etc.) would become dependent on obsolete techniques or resources and would be stuck in the past, using outdated approaches to address evolving public health threats. Thus, the District would soon no longer be utilizing best available methods and would fall behind in its use of the most effective and target-specific chemicals and approaches. This would negatively impact both public health and the environment, and those impacts would tend to increase with time.

15.4 Do Nothing

An alternative no project/no program condition assumes that the current activities would cease and result in a “do nothing” alternative going forward. Key assumptions for a future Do Nothing Alternative are:

- > Current regulatory controls would continue and expand as needed; however, the District would not engage in implementing any of these regulations concerning public health and management of vectors carrying potential diseases. For all practical purposes, the District’s office would close. Public education and other outreach activities would cease along with the control activities.
- > Private landowners would manage mosquito and/or vector problems on private land without any state or federal oversight with pesticides approved for use. Households would use pesticides commonly available from retail outlets where permethrin and pyrethroids are common ingredients.
- > In the absence of the District’s IMVMP, CDPH would not provide mosquito and vector “oversight” to local jurisdictions given lack of personnel, equipment, or funding.

A study of residential pesticide use in California, including the San Francisco Bay Area, was conducted to understand consumer behavior and sources of pesticides in urban waterways (Flint 2003). The UC Statewide IPM Program sponsored a telephone survey and a shelf survey of pesticide products to collect information about outdoor pesticide use, pest control practices, and attitudes of residents in 2002-2003. It includes the following findings (from the Chapter 1 Summary) that are most relevant to the analysis herein:

- > Insects were considered by far the greatest outdoor pest problem in all northern California areas. Ants were the most common pest treated by residents themselves or by professional applicators hired by the homeowner.
- > More respondents in the Bay Area (40.6 percent) reported no outdoor use of pesticides, compared to residents in the Stockton or Sacramento areas.
- > The largest share of the respondents who had applied pesticides in the past 6 months stated that they normally applied pesticides between 1 and 3 times a year. About one third applied pesticides more than 3 times a year, and 3.4 percent of the Bay Area respondents applied pesticides more than 12 times a year.
- > Only a minority of residents hire pest control professionals to manage outdoor problems.
- > Almost half of respondents in the three northern California watersheds disposed of pesticides improperly. Many of these threw pesticide containers containing pesticides into the trash, but 5-15 percent in each area admitted to pouring mixed pesticides into inside or outside drains or the street gutter.
- > Substantial numbers (44-62 percent in all areas) “estimate” rather than follow label directions precisely when measuring and mixing pesticides. About half of the products used by residents were ready-to-use products requiring no mixing or dilution.
- > Large home supply stores accounted for 42 to 52 percent of all pesticide sales to residential users in northern California.
- > The store shelf survey found that certain active ingredients were very dominant in the market, including 78 different products containing the insecticide permethrin. Another pyrethroid used primarily for indoor pests, tralomethrin, was found in 32 products. Other common active ingredients were the herbicide dicamba (28 products), the insecticide pyrethrin (26 products), and the herbicide glyphosate (25 products).
- > Retail shelves contained unregistered pesticides. Pesticides that are no longer registered for use in California were found on shelves of many of the stores surveyed.

In light of this study, it is likely that the same or similar chemicals in agricultural and pest control products would continue to be applied. Individual landowners would likely increase their use of chemicals to kill mosquitoes (which would no longer be prevented from maturing due to loss of an integrated management plan), but without the training and adherence to label instructions and BMPs followed by District employees. Because public health pesticides account for only an estimated 0.9 percent of all reportable pesticides applied, and approximately 0.3 percent of total estimated pesticide use statewide (Howard et al. 2010), the net effect of the Do Nothing Alternative would likely mean that the overall use of pesticides would stay the same or increase because the scattered individual vector reduction efforts and limited access to vector habitat by the public and private pest control operators would not be as effective at controlling the spread of vectors and disease on a countywide basis. These efforts would also be reactive (to adult mosquitoes and other vectors) rather than proactive (i.e., the IPM/IVM method that addresses the source of the problem first) and would, therefore, require more environmentally impactful responses.

In comparison to existing conditions with the current Program fully implemented, the Do Nothing Alternative would have the following environmental impacts:

- > **Land Uses and Planning.** No conflicts with local land regulations and no disruption to recreationists from temporary closures of trails or other park features would occur in the absence of the District's chemical treatments or other Program efforts. However, the increase in mosquitoes and other vectors would impact the quality of the recreational experience and homeowners due to an increase in discomfort from biting mosquitoes and stinging insects. Stinging insects can cause severe allergic reactions in sensitive individuals, leading to hospitalization and even death. Without control of saltmarsh mosquitoes, all land uses could be affected in nearby areas. Residents could also experience an increase in rodents at their homes and businesses. Parts of San Mateo County (specifically areas in San Mateo, Burlingame, and Hillsborough) were uninhabitable during certain times of year prior to the creation of the District's Program, and in the absence of District intervention via access to public lands and a comprehensive approach, could reasonably be expected to revert to that status. These impacts are **potentially significant**.
- > **Biological Resources – Aquatic.** In the absence of physical controls, including the draining of aquatic habitats, no impact would occur to aquatic special-status species using those habitats if present. No conflicts with existing provisions of an HCP/NCCP would occur. In light of existing practices and authorities, it is assumed CDPH would not be able to employ chemical treatments to the same extent as the District. The Mosquito Adulticides would not be used for mosquito control. However, lack of IPM-based larval surveillance and control may lead to increased, non-IPM based use of adulticides by individuals and private contractors that could affect aquatic habitats. Ad-hoc larviciding by individuals using unregistered materials (e.g., bleach, oil) would cause substantial harm to biological resources including aquatic habitats. In short, **potentially significant** impacts to aquatic resources would occur under No Program.
- > **Biological Resources – Terrestrial.** Under a Do Nothing Program, terrestrial resources in general would not be impacted significantly. The draining of aquatic habitats would not occur, resulting in creation of less terrestrial habitat. However, in the absence of organized mosquito and vector control, unlicensed individuals may apply over-the-counter pesticides on their own, without training, and potentially without adhering to label requirements. Furthermore, wildlife including some birds would be subject to greater incidence of vector-borne disease including WNV. The overall impact is **potentially significant** especially if sensitive species are affected.
- > **Ecological Health.** Fewer herbicide and pesticide treatments by an organized mosquito and vector control agency/the District would be used to control mosquitoes and other vectors under a Do Nothing Program. Indiscriminant use of aerosol foggers by the public (which contain a narrow range of insecticides) may lead to increased pesticide resistance issues. In the absence of physical controls and nonchemical vegetation management, it is possible that the habitat conditions would result in greater

rates of infection of species involved in the transmission of disease. Domesticated animals would suffer greater incidence of disease and discomfort. The potential exists for increased use of inappropriate or unregistered materials such as bleach, oil, gasoline, diesel fuel, etc., in an effort to deal with vectors, especially mosquitoes and yellow jackets. Their use can cause significant environmental harm compared to materials applied in accordance with label requirements by trained, licensed professionals. An increased potential also exists for improper disposal of the product into water and waste systems in light of user studies. Greater incidence of diseases, possible pesticide resistance, and environmental harm from inappropriate/unregistered materials would be **potentially significant** impacts.

> **Human Health.** In the absence of the District's IMVMP, greater incidence of vector-borne disease and discomfort to people would occur in the Program Area. A wide range of public health issues would occur with the Do Nothing Program.

- *First*, risk of human cases of vector-borne disease and vector interaction issues for humans, pets, and wildlife would increase. The San Francisco Bay Area has a well-documented history concerning human-vector interaction, especially with mosquitoes.
- *Second*, the lack of any form of coordinated surveillance reduces the ability of any agency to perform disease risk assessments and, therefore, predict potential outbreaks. Although vector-borne disease is not as prevalent as in other areas of the world (likely because of IPM/IVM efforts of local agencies), vector-borne pathogens are still present.
- *Third*, lack of coordinated surveillance increases the risk of emerging infectious diseases or vectors going undetected until they have become established.
- *Fourth*, lack of public outreach results in less current information being available about vectors and vector-borne disease risk reduction. This lack can lead to increased production of vectors on private property as well as increased cases of vector-borne disease in humans, their pets, and livestock. Additionally, the increase in vector-human interactions would result in an increased risk of severe reactions to the bites and stings of vector organisms (e.g., mosquitoes, ticks, and wasps) in sensitive and immunocompromised individuals. Lack of public outreach also means there is no means for the public to be informed of proper individual chemical control or other efforts.
- *Fifth*, in the absence of organized mosquito and vector control programs, unlicensed individuals would likely begin applying over-the-counter pesticides on their own. Most of these individuals have little or no training in the proper and effective use of these materials, meaning a reasonable possibility exists of over- or under-application as well as the potential for creation of unrecognized resistance issues. This possibility is especially true for the indiscriminate use of aerosol foggers as well as concentrated pesticides that require mixing with water prior to application. Additionally, the health and well-being of sensitive individuals (e.g., asthmatics and chemically sensitive people) and their pets (especially birds and fish) could be affected by the unexpected drift of these pesticides into their yards, open windows, and neighborhood parks.

CDPH would not be able to replace all of the services the District currently provides or would provide under the Proposed Program. Lack of coordinated surveillance increases risk of emerging diseases or vectors going undetected until already established in an area; it reduces disease risk assessments and outbreak predictions at the local level. Lack of public outreach leads to increased vector production on private property and less information being available to people about vector-borne disease reduction. Many homeowners would resort to use of pesticides available to them, many of which are more toxic than the ones used by the District. This impact on human health is **potentially significant**.

- > **Public Services and Hazard Response.** The greater use of over-the-counter pesticides could lead to greater improper disposal of the containers. Greater demand on emergency services could also occur due to improper use of pesticides resulting in accidental poisonings, adverse reactions of asthmatics and chemically sensitive individuals due to applications made out of compliance with label restrictions, etc. A greater incidence of disease and discomfort would potentially increase the demand for emergency services in the Program Area, a **potentially significant** impact.
- > **Water Resources.** Under a Do Nothing Program, use of chemical treatments by the District would be reduced compared to existing conditions. However, the amount of unregulated chemical applications (fogging) made by the public could increase. **No impact** on surface and groundwater resources would occur.
- > **Air Quality.** The District would cease vector control activities, resulting in no use of vehicles, equipment, or pesticides and herbicides. **A less-than-significant** impact on air quality would occur. The public may resort to fogging for mosquito control.
- > **Greenhouse Gases and Climate Change.** The District would cease vector control activities, resulting in no use of vehicles, equipment, or pesticides and herbicides. However, increased mosquito populations may lead to reduced outdoor recreation, especially nonmotorized recreation such as hiking and bicycling, and increased indoor recreation involving greater electricity usage for air conditioning and entertainment. **A less-than-significant** impact on GHG emissions would occur.
- > **Noise.** The District would cease vector control activities, resulting in no use of vehicles, equipment, or pesticides and herbicides. **No impact** on noise would occur.
- > **Economic Conditions.** A number of economic issues are associated with the Do Nothing Program Alternative. Appendix E cites several sources of information on the cost of not having effective vector control in an area with key findings presented below:
 - *First*, with increased human-vector interactions comes an increase in the number of cases of vector-borne disease. The short-term medical and lost workplace, school, and home time associated with illness can cost governments, businesses, families, and individuals upwards of many thousands of dollars.
 - *Second*, increased vector populations can lead to reduced outdoor recreation activities by the public, resulting in increased usage of electricity for air conditioning and indoor entertainment. These increases could also lead to a reduction in revenues for recreational areas such as parks, campgrounds, marinas, and other areas that depend on usage fees to help with their maintenance and staffing, not to mention the impacts on other aspects of tourism (food, lodging, gear purchases, and equipment rentals).
 - *Third*, increased vector populations not only lead to increased levels of vector-borne disease but can also result in decreased property values. Property values form an essential part of the revenue stream for government services such as schools, police, fire, libraries, parks, and health and welfare programs.
 - *Fourth*, the cost of hiring private contractors to provide vector control services on a site-specific basis can end up being more costly than the costs associated with the current program (with economies of scale).

Under the Do Nothing Alternative, the District would perform no surveillance, physical control, vegetation management, biological control, chemical control, or other nonchemical control activities within its Service Area or in adjacent jurisdictions. “Do nothing” means the District would cease to exist and not provide the services funded by local property taxes. It is assumed that CDPH would not be able to provide even limited vector management services at the local level. As a result, the vectors of human and animal disease and discomfort would be more numerous than under existing conditions, and proliferate such that

outbreaks of disease and illness would occur more frequently. See Appendix E, (Section 4.2) for a more extensive discussion of No Program than presented herein with historical information going back to 1772.

15.5 Alternatives to Reduce Significant Impacts

CEQA Guidelines Section 15126.6(b) also requires that a draft EIR identify alternatives that are capable of avoiding or substantially lessening the significant environmental effects of the proposed project, even if the alternative would impede to some degree the attainment of all of the project objectives or would be more costly. Two significant impacts to air quality and water resources, under the Chemical Control Component of the Proposed Program, are discussed below.

A potentially significant air quality impact is associated with the Chemical Control Component. The Chemical Control Component could subject people to objectionable odors. Impacts even with BMPs implemented could be **potentially significant but mitigable** (Impact AQ-25). Certain VOCs, sulfur compounds, and chlorine compounds found in some pesticides such as OPs emit characteristic odors when they evaporate (volatilize) into air, even at very low concentrations well within safety limits. Pesticides currently used or proposed for future use emit phenols (e.g., deltamethrin, etofenprox, permethrin, resmethrin, and lambda-cyhalothrin). Some nonphenol materials such as Bti liquid and the adulticides pyrethrin and permethrin have an odor. As part of the District's IMVMP, small quantities of these types of substances are typically used. Bti liquid is odorous and used in greater quantities by the District as a mosquito larvicide than the use of the other chemicals for adult insect control. Lambda-cyhalothrin is only used in small quantities from a can to treat ground-nesting yellow jackets. The human sense of smell (olfactory system) is sensitive to these types of compounds as a warning mechanism, and some individuals are more sensitive than others. The Chemical Control Component would apply certain types of odorous treatments using hydraulic spraying and atomizing (fogging), excluding lambda-cyhalothrin, which could result in drift of small droplets and gaseous vapors. Depending on atmospheric conditions (i.e., wind direction, wind speed, stability class), this drift could subject people to objectionable odors near a treatment area. Without site-specific information, it cannot be determined whether an objectionable odor may persist downwind of a particular treatment area; therefore, an application containing an odorous compound may impact an undefined number of people for an undefined period of time. The materials have been used in the current Program, and people have not complained about odors. However, it is possible that complaints could occur in the future despite public notification procedures about large-scale treatments. Mitigation measures allow for greater precision in application technology and in adjusting the application to atmospheric conditions to minimize the potential for drift into populated areas.

Naled is an OP insecticide that could be used in the future in rotation with pyrethrins or pyrethroids to avoid the development of resistance in adult mosquito populations. Naled tends to degrade quickly in surface waters especially following ULV applications. However, dichlorvos (a registered pesticide) is a breakdown product of naled that may be present in toxic concentrations after naled is no longer detectable. It does not persist in surface water and, because of breakdown by soil microorganisms, is unlikely to leach to groundwater. However, due to the toxicity of its breakdown product dichlorvos, and its importance to the District's IMVMP, use of naled is **significant and unavoidable** relative to the possibility it could impact a pesticide-impaired surface waterbody such as lower San Mateo Creek (Table 9-2) for a brief period.

Modifications to the Proposed Program could include the following "Reduced Program Alternatives" which would avoid some or most of the potentially significant impacts associated with the Proposed Program, depending on how reliance on the other Program components (i.e., exclusion of some options) to achieve a similar level of control could or would be implemented.

15.5.1 Reduced Chemical Control Alternative

This alternative Program would eliminate the options under the Chemical Control Alternative of using one or more of the pesticides with the greatest potential to subject people to objectionable odors: lambda-cyhalothrin, pyrethrin, permethrin, resmethrin, deltamethrin, etofenprox and Bti liquid for control of mosquitoes and for control of yellow jacket wasps. It could result in greater use of other, less odorous chemicals and in greater amounts, which could have impacts on public health if these other chemical methods are not as effective for the specific treatment area due to vector resistance problems (see No Chemical Alternative below). All of these odorous pesticides can be used without significant impacts to public health or to other air quality parameters; but where people are located close to or within a chemical treatment area, the odor could be a short-term problem for some persons even when the application is within product label specifications for wind speed and consistent with District BMPs. To be clear, the use of any of these odorous compounds is a potentially significant impact that can be mitigated by using the additional measures to enhance application precision under the most favorable wind conditions. The District could implement additional mitigation to reduce a potentially significant but mitigable impact to less than significant.

The Reduced Chemical Control Alternative has another option that would eliminate the use of the adulticide naled which poses a significant and unavoidable impact to surface water quality (described in Section 15.5).

The Reduced Chemical Control Alternative could be implemented consistent with the Program objectives as long as other, less odorous chemical options are available for use and the vector is not resistant to the remaining chemical options. Limiting the choices of materials that can be used to a few chemicals and/or eliminating the use of naled significantly increases the risks of vector resistance to the few products that are available for use. Sound IVM involves many tools, with many materials being used, and using the most effective and least environmentally harmful tool.

For the other land use, biological, ecological health, human health, public services/hazard response, water quality, air quality, GHGs, and noise environmental resources and issues, the impacts of the Reduced Chemical Control would be “no impact” or “less-than-significant impact” for just the nonodorous ingredients removed, consistent with the environmental impact evaluations provided in Chapters 3 through 12 for the Surveillance, Physical Control, Vegetation Management, Chemical Control, and Other Nonchemical Control/Trapping Components. However, see Table 15-1 for the specific impact statements by resource and issue which would be applicable to a Reduced Chemical Control Alternative with the exception of Impact AQ-25 which would be less than significant. With the exclusion of naled from the Program, Impact WR-25 would be deleted. However, if the less odorous pesticides and the exclusion of naled result in a less effective Program due to vector resistance issues, then the public health impacts from a less effective Program would be a greater incidence of vector-borne disease and discomfort to people, pets, livestock, and wildlife in the Program Area than under the Proposed Program but not as much as would occur under the Do Nothing Program or the reduced Program with a No Chemical Control Alternative.

Another form of reduced chemical control would be the idea that the use of adulticides or larvicides should be limited by ensuring their use is justified first with documented mosquito-borne disease activity within flight range of the treatment area. This option to delay use of adulticides or larvicides until mosquitoes test positive for WNV or other disease and then treat is not effective mosquito control based on IVM principles in most instances because it could result in the following conditions:

- > It takes several days to collect adult mosquitoes, test them, and get positive (or negative) results. By the time positive results are available, the public is at greater risk of contracting the disease because the mosquitoes will have spread out, producing more generations and a higher overall population.

- > A larger area would be treated than would be needed due to spread of multiple generations.
- > With emergence of adults, a greater reliance on adulticides (more product used) is required but less desirable.

In the case of WNV and other diseases, with the District controlling the mosquito population proactively, the number of adults testing positive is reduced with a subsequent reduction in birds testing positive and spreading the disease back to mosquitoes and potentially to humans.

15.5.2 Reduced Vegetation Management Alternative

The Proposed Program includes both terrestrial and aquatic vegetation control with the herbicide glyphosate, and the PEIR concludes that substantial evidence shows that products comprised of glyphosate do not pose significant impacts to either human or ecological health. However, much public controversy exists over the use of the herbicide glyphosate. A Reduced Vegetation Management Alternative presented here would be based on inclusion of all of the physical and chemical management options of the Vegetation Management Component of the Proposed Program except for the use of glyphosate.

The PEIR preparers reviewed numerous studies on glyphosate, the World Health Organization (WHO) report, and scientific reviews of the WHO report in determining that potential use by the District poses a less-than-significant impact on human health. After publication of the WHO report listing glyphosate as a probable carcinogen, dozens of practicing scientists in the mainstream scientific community (including European Food Safety Administration, the German Federal Institute for Risk Assessment, and the lead author of one of the studies used by the International Agency for Research on Cancer (IARC) to draw their conclusions) have criticized and disputed the results of the IARC for using a poor methodology and inadequate research. The conclusions drawn by the IARC about the potential adverse effects of glyphosate were based on studies that are not relevant to actual, potential exposures, such as studies that were based on high exposures to petri dish cells and in vitro laboratory conditions.

The studies reporting potential human health effects are associated with extreme exposures to applicators during misuse scenarios and spills and/or working in the preparation of the commercial products. These conditions and potential exposure conditions are neither typical nor likely in the use and applications by trained District staff. All application directions include detailed procedures to deal with a spill. Glyphosate remains a reliable and environmentally compatible product for use in the numerous situations where control of vegetation is needed for habitat management (for staff access to sites for vector control or for assistance to other land managers with invasive species control). Importantly, it has been demonstrated that herbicides are a different class of chemicals than those classified as insecticides that have specific, demonstrated autonomic effects. The media reports about the hazards of glyphosate and its several commercial products have not been clearly associated with human health impacts. The numerous reports about “possible” connections to metabolic processes and subtle effects also include confounding factors that make scientifically defensible claims impossible. Where reports of adverse subtle effects exist, they are usually based on laboratory studies of changes to cells after immersion exposures, which are exposures far above any possible actual human (or animal) exposure. The implication and correlation of such exposures to actual potential exposures in humans or animals are not realistic. In fact, a recent federal court judgment overturned an overly conservative Proposition 65 potential carcinogen labeling requirement for Roundup (glyphosate) in California based on the determination of inappropriate use of scientific assumptions (US District Judge William Shubb, February 26, 2018). Because of the inappropriate use of the scientific process, this proposition should not be used as justification to characterize the risk of glyphosate and many other chemicals. The USEPA has also evaluated whether glyphosate products are endocrine disruptors and determined that based on weight of evidence considerations using the laboratory mammals, no additional testing for mammals or wildlife was recommended for glyphosate. The results of the USEPA reviews have reported there was no convincing evidence of potential interaction of glyphosate exposure with the estrogen, androgen, or thyroid pathways (USEPA 2015a).

Some reports cited by the public suggest that the potential impact of glyphosate and glyphosate products includes adverse impacts to several life stages of amphibians and their habitats. These reports are not directly relevant to the potential impact of glyphosate on the California red-legged frog (CRLF) in the environment under the uses proposed because the data presented is based primarily on toxicity in laboratory studies using both high doses and several sequential lower doses in a laboratory setting, which resulted in exponentially higher exposure to the chemical than would occur in practice. The primary causes identified by the USFWS as leading to an adverse impact on the status of the threatened CRLF are loss of habitat and overwhelming predation, invasive species, and competition for foraging items. The potential impact of glyphosate on the CRLF is marginal and only applicable in situations of excess exposure to incorrectly treated areas. The toxicity and adverse effects reported in laboratory studies would not be expected to occur as a result of the District's potential herbicide applications for surveillance access and for mosquito, tick, or invasive species control in the field, because of the much lower potential exposures and the District's adherence to its BMPs. Special care is taken to avoid applications where CRLF have been identified and reported by resource agency personnel or District biologists and technicians based on observations and database investigations.

The Reduced Vegetation Management Alternative could be implemented consistent with most of the Program objectives as long as other appropriate and cost-effective herbicide options are available for use. Glyphosate is most often used for large area control of weeds and for small area control of other problem vegetation creating habitat for mosquitoes and ticks. Sound IVM involves many tools, with many materials and control alternatives being considered and using the most effective, economically feasible, and least environmentally harmful.

There is no significant advantage to the Reduced Vegetation Management Alternative because the opposition to glyphosate is not based on scientific or medically confirmed evidence. The impacts to ecological and human health from glyphosate are less than significant.

15.5.3 No Chemical Control Alternative

This alternative would exclude all of the pesticide and herbicide products associated with the Chemical Control and Vegetation Management Components from the Proposed Program. It would rely solely on Surveillance, Physical Control, the nonchemical physical component of the Vegetation Management Component, Biological Control (mosquitofish), and the Other Nonchemical Control/Trapping Component, along with ongoing public education. The issue is whether a Program made up only of these remaining components and options would be effective and meet Program objectives and IVM principles.

An example of reliance on only nonchemical tools with public education is the approach the State of Texas took in 2012 to deal with a WNV outbreak.

- > In Summer 2012, the Dallas-Fort Worth Metroplex experienced a severe WNV outbreak in which more than 1,868 confirmed cases of West Nile disease and 89 WNV-related deaths were reported. The analysis of mitigation efforts for the WNV outbreak in Texas suggested two lessons for improving public health system in preparation for future events. The need for: (1) clear, comprehensive, uniform data systems that include mosquito data and (2) science-based triggers for spraying, as well as mutual assistance plans with spraying companies and among jurisdictions for times when spraying is necessary. (Harris County Public Health & Environmental Services 2012)
- > Spraying larvicides and/or adulticides for mosquitoes was not part of Texas' routine protocol. Texas had not sprayed for mosquitoes in 43 years before the WNV outbreak. The WNV outbreak in Texas demonstrated the capacity for an epidemic to spread from one state to the entire country. Once the spraying was completed (2 applications), a 93 percent reduction in disease-carrying mosquitoes occurred, while areas that were not sprayed reported an increase. (Zhang 2012)
- > In 2010, 2011, and 2012, Dallas County's health department did not purchase mosquito larvicides until July 30, 2012, following the CDC telling the department that Dallas was already at the highest possible

risk level for WNV. To avoid outbreaks such as what occurred in Dallas, aggressive larviciding is an effective tool along with surveillance of dead birds. (Friedman 2012)

Bandon Marsh National Wildlife Refuge (889 acres) protects the largest remaining tidal salt marsh within the Coquille River estuary in Oregon. The USFWS had restored an old hayfield back to tidal marsh by September 2011, with resultant mosquito production that resulted in an angry public with the mayor and a congressman getting involved. The USFWS now treats for mosquitoes using Bti larvicides, methoprene, and oil as a last resort.

These reports and others indicate that chemical control was required to combat an outbreak of mosquitoes (Oregon) and mosquitoes infected with WNV (Texas). Not letting mosquito populations get out of control due to inadequate surveillance and control measures is critical to avoidance of a large outbreak such as the one experienced in Texas in 2012. Consequently, a No Chemical Control Alternative would not be effective and not meet the District's Proposed Program objectives stated in Section 2.2.2.

Another more recent example of a situation where chemical control was required occurred during late June through early August 2016. Twenty-nine people were identified as having been infected with Zika virus through local mosquito-borne transmission, including 28 in Miami-Dade County and one in Broward County. Two cases were considered to be isolated with evidence of further transmission. However, the Florida Department of Health identified an area of the Wynwood neighborhood with a cluster of cases, indicating ongoing spread of Zika virus by mosquitoes. Surveillance data showed intense transmission at a worksite and in the community. Although the outbreak was focalized, it continued to spread despite intense ground-based mosquito elimination efforts. Transmission rapidly ceased after Florida health officials implemented an aerial spraying plan that included use of the pesticides naled and *Bacillus thuringiensis* to kill both adult mosquitoes and larva.

Elimination of the application of pesticides by the District would not significantly reduce the amounts of pesticides introduced into the environment (given that public health agencies contribute only 0.9 percent of the reportable pesticide applications, or an estimated 0.3 percent of overall pesticide application in the state) (Howard et al. 2010), but would severely restrict the District's ability to carry out its mission of protecting the public from vectors and vector-borne diseases.

There is no significant advantage of discontinuing chemical applications. Studies and risk assessments have not indicated significant adverse effects to nontarget species (humans or wildlife) when the particular pesticides in use by the District are applied for vector control at label rates and in a manner consistent with label guidelines (Davis et al. 2007; Davis and Peterson 2008; Macedo et al. 2010).

The No Chemical Control Alternative would not meet the principles of successful IVM. The impacts to public health would be as follows:

- > **Human Health.** In the absence of the chemical control tools being included in the District's IMVMP, greater incidence of vector-borne disease and discomfort to people, pets, and livestock would occur in the Program Area. A wide range of public health issues would occur with the No Chemical Control Alternative.
 - *First*, risk of human cases of vector-borne disease and vector interaction issues for humans, pets, livestock, and wildlife would increase. The San Francisco Bay Area has a well-documented history concerning human-vector interaction, especially with mosquitoes.
 - *Second*, increased production of vectors would occur on private property adjacent to areas that previously were treated with pesticide (and herbicide) products as well as increased cases of vector-borne disease in humans, their pets, and livestock. Additionally, the increase in vector-human interactions would result in an increased risk of severe reactions to the bites and stings of vector organisms (e.g., mosquitoes, ticks, and wasps) in sensitive and immunocompromised individuals.

- *Third*, in the absence of organized mosquito and vector control programs using chemical controls and reduced effectiveness in controlling vectors, unlicensed individuals could begin applying over-the-counter pesticides on their own. Most of these individuals have little or no training in the proper and effective use of these materials, meaning a reasonable possibility exists of over- or under-application as well as the potential for creation of unrecognized resistance issues. This possibility is especially true for the indiscriminate use of aerosol foggers as well as concentrated pesticides that require mixing with water prior to application. Additionally, the health and well-being of sensitive individuals (e.g., asthmatics and chemically sensitive people) and their pets (especially birds and fish) could be affected by the unexpected drift of these pesticides into their yards, open windows, and neighborhood parks.

This impact on human health is **potentially significant**.

15.6 Comparison of Program Components

Table 15-1 presents a summary of all of the impacts associated with each Program Component and, therefore, the overall Proposed Program with all of the existing and future components combined. The potential for objectionable odors to people under the Chemical Control Component is the only situation where potentially significant impacts could occur.

- > The Surveillance Component has the potential for less-than-significant impacts to recreational land use and planning, biological resources (aquatic and terrestrial), ecological health, public services/hazard response, air quality, GHGs, and noise. It has no impacts to land use regulations, human health, and water resources.
- > The Physical Control Component has the potential for less-than-significant impacts to recreational land uses, biological resources (aquatic and terrestrial), ecological health, human health, public services/hazard response, water resources, air quality, GHGs, and noise. It has no impacts to land use regulations and planning.
- > The Vegetation Management Component has the potential for less-than-significant impacts to recreational land uses, aquatic and terrestrial biological resources, ecological health, human health, public services/hazard response, water resources, air quality, GHGs, and noise. It would have no impact to land use regulations and planning.
- > The Biological Control Component has the potential for less-than-significant impacts to ecological health, water resources, air quality, GHGs, and noise, and public services/hazard response. It has no impacts to land use and planning, biological resources (aquatic and terrestrial), and human health.
- > The Chemical Control Component has less-than-significant impacts to recreational land uses, aquatic and terrestrial biological resources, ecological health, human health, surface and groundwater resources for most formulations, public services/hazard response, GHGs, and noise. It has no impacts to land use and planning. The potential for subjecting people to objectionable odors occurs for both existing and future activities depending on the formulation used and proximity of treatment locations to human activities, a significant impact that can be mitigated to less than significant. It includes the significant and unavoidable impact to surface water from the possible future use of naled to avoid the development of pesticide resistance to the pyrethrins and pyrethroids.
- > The Other Nonchemical/Trapping Component has less-than-significant impacts to the following resources and issues: recreational land uses, public services/hazard response, air quality, GHGs, and noise. It has no impacts to land use regulations, biological resources (aquatic and terrestrial), ecological health, human health, and water resources.

15.7 Environmentally Superior Alternative

Table 15-1 presents a summary of all the statements of impact with significance determinations. For Surveillance, Physical Control, Vegetation Management, Chemical Control, and Nonchemical Control/Trapping Components, the impacts are either “less than significant” (LS) or “no impact” (N) with two exceptions. One potentially significant but mitigable impact (SM) and one significant and unavoidable impact (SU) are both associated with the Chemical Control Component.

- > The Chemical Control Component could subject people to objectionable odors. Impacts even with BMPs implemented could be **potentially significant but mitigable**. Certain VOCs, sulfur compounds, and chlorine compounds found in some pesticides emit characteristic odors when they evaporate (volatilize) into air, even at very low concentrations well within safety limits. Pesticides currently used or proposed for future emit phenols (e.g., deltamethrin, etofenprox, permethrin, or resmethrin, and lambda-cyhalothrin). Some nonphenol materials such as Bti and the adulticides pyrethrin and permethrin also have an odor. As part of the District’s IMVMP, small quantities of these types of substances are typically used. The human sense of smell (olfactory system) is sensitive to these types of compounds as a warning mechanism, and some individuals are more sensitive than others. The Chemical Control Component would apply certain types of odorous treatments using hydraulic spraying and atomizing (fogging), excluding lambda-cyhalothrin (applied directly from a can into yellow jacket nests), which could result in drift of small droplets and gaseous vapors. Depending on atmospheric conditions (i.e., wind direction, wind speed, stability class), this drift could subject people to objectionable odors near a treatment area. The materials have been used in the current Program, and people have not complained about odors. However, it is possible that complaints could occur in the future despite public notification procedures about large-scale treatments. Mitigation measures allow for greater precision in application technology and in adjusting the application to atmospheric conditions to minimize the potential for drift into populated areas.
- > This component includes the future option of using the OP insecticide naled in rotation with pyrethrins or pyrethroids to prevent the development of resistance. Naled tends to degrade quickly in surface waters especially following ULV applications. However, dichlorvos is a breakdown product of naled that may be present in toxic concentrations after naled is no longer detectable. It does not persist in surface water and, because of breakdown by soil microorganisms, is unlikely to leach to groundwater. However, due to the toxicity of its breakdown product dichlorvos and its importance to the District’s IMVMP, potential use of naled would pose a **significant and unavoidable impact** relative to the possibility it could impact a pesticide-impaired surface waterbody such as lower San Mateo Creek for a brief period.

Section 15.5 describes three "Reduced Alternative Programs:" Reduced Chemical Control, Reduced Vegetation Management, and No Chemical Control.

- > **Reduced Chemical Control.** To the extent the District can modify elements of the Chemical Control Component to mitigate identified impacts by avoiding completely or in part the potentially significant impacts associated with some pesticide products for control of mosquitoes and yellow jacket wasps (by using fewer of these products or by eliminating them in favor of using other, less odorous products and by excluding the future use of naled), then the **environmentally superior alternative would be a Program incorporating these modifications as components of the overall IMVMP**. However, limiting the choice of materials that can be used to a few chemicals significantly increases the risks of a vector developing resistance to the few products that are available for use and, therefore, resulting in ineffective vector control, which does not meet the Program’s basic objectives. Excluding air quality and the odor issue and the water quality issue associated with naled, the impacts to all of the other resources would be the same as for the Proposed Program.
- > **Reduced Vegetation Management.** By removing the herbicide glyphosate from the chemical options for vegetation control, the District could incur additional costs from using other, more expensive

materials. Also, eliminating glyphosate would not lower the risk of chemical exposure to people and nontarget animals and insects because of its low toxicity. No significant impacts associated with the use of glyphosate have been identified when applied as a part of the Proposed Program. Greater reliance on physical methods of vegetation removal could be more disruptive to species in close proximity to the area relying on hand tools and equipment. This alternative would be consistent with most of the Program objectives because the District's IMVMP incorporates a variety of physical and chemical control options and at the current time other appropriate herbicide active ingredients are available for most applications. However as glyphosate is a highly effective active ingredient with a long history of nonhazardous and effective use and the public concern regarding its potential hazards is not based in sound science, its exclusion from the Program would be essentially arbitrary. This alternative provides no tangible benefit to either public health or the environment and removes a valuable tool from the District's IMVMP.

- > **No Chemical Control.** This alternative would completely remove the chemical treatment options under the Vegetation Management and Chemical Control Components. It would rely solely on Surveillance, Physical Control, the nonchemical physical component of the Vegetation Management Component, Biological Control (mosquitofish), and the Other Nonchemical Control/Trapping Component, along with ongoing public education. It would not have any of the less-than-significant impacts associated with herbicide and pesticide use or the two significant impacts related to odorous products and naled. However, it was determined to be inconsistent with Program objectives and IVM principles, and it could lead to substantial impacts to human health due to the reduced effectiveness of the Program in controlling mosquito and other vector populations.

The Do Nothing Alternative is not the environmentally superior alternative due to its potentially significant impacts to the following resources and concerns identified in Section 15.3, land uses and planning, aquatic and terrestrial biological resources, ecological health, human health, and public services and hazard response.

The No Program Alternative (Existing Program activities only) is not the environmentally superior program because it has the potential air quality impacts of the Proposed Program even though it does not have the water quality impact associated with naled.

Table 15-1 Summary of Program Impacts by Technical Components

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
3. Land Use and Planning						
Impact LU-1: Surveillance of vectors would not appreciably impact the quantity and/or quality of recreational opportunities in the Program Area. This impact is less than significant and no mitigation is required.	LS	na	na	na	na	na
Impact LU-2: Surveillance of vectors would not conflict with applicable land use regulations. No impact would occur.	N	na	na	na	na	na
Impact LU-3: Physical control of vector habitat would not appreciably impact the quantity and/or quality of recreational opportunities in the Program Area. This impact is less than significant and no mitigation is required.	na	LS	na	na	na	na
Impact LU-4: Physical control of vectors would not conflict with applicable land use regulations. No impact would occur.	na	N	na	na	na	na
Impact LU-5: Vegetation management would not appreciably impact the quantity and/or quality of recreational opportunities in the Program Area. This impact is less than significant and no mitigation is required.	na	na	LS	na	na	na
Impact LU-6: Vegetation management would not conflict with applicable land use regulations. No impact would occur.	na	na	N	na	na	na
Impact LU-7: Biological control of vectors would not appreciably impact the quantity and/or quality of recreational opportunities in the Program Area. No impact would occur.	na	na	na	N	na	na
Impact LU-8: Biological control of vectors would not conflict with applicable land use regulations. No impact would occur.	na	na	na	N	na	na
Impact LU-9: Chemical application to control vectors would impact recreational access and the quality of recreational opportunities in the Program Area. However, because these impacts would be isolated and short term, they are considered less than significant and no mitigation is required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact LU-10: The Chemical Control Component would not conflict with applicable land use regulations because state law preempts local ordinances. No impact would occur.	na	na	na	na	N	na
Impact LU-11: Trapping of vectors would not appreciably impact the quantity and/or quality of recreational opportunities in the Program Area. This impact is less than significant and no mitigation is required.	na	na	na	na	na	LS
Impact LU-12: Other nonchemical control and trapping of vectors would not conflict with applicable land use regulations. No impact would occur.	na	na	na	na	na	N
4. Biological Resources - Aquatic						
Impact AR-1. The Surveillance Component would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	LS	na	na	na	na	na
Impact AR-2. The Surveillance Component would have a less-than-significant impact on any riparian habitat or other sensitive natural community. No mitigation is required.	LS	na	na	na	na	na
Impact AR-3. The Surveillance Component would have a less-than-significant impact on federally protected wetlands as defined by CWA Section 404. No mitigation is required.	LS	na	na	na	na	na
Impact AR-4. The Surveillance Component would have no impact on the movement of any native resident or migratory fish or wildlife species. Nor would it impact any native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	N	na	na	na	na	na
Impact AR-5. The Surveillance Component would have no impact on local policies or ordinances protecting biological resources.	N	na	na	na	na	na
Impact AR-6. The Surveillance Component has a less-than-significant impact on any adopted HCPs or NCCPs. No mitigation is required.	LS	na	na	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AR-7. The Physical Control Component, would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	LS	na	na	na	na
Impact AR-8. The Physical Control Component would have a less-than-significant impact on any riparian habitat or other sensitive natural community. No mitigation is required.	na	LS	na	na	na	na
Impact AR-9. The Physical Control Component would have a less-than-significant impact on federally protected wetlands as defined by CWA Section 404. No mitigation is required.	na	LS	na	na	na	na
Impact AR-10. The Physical Control Component would have a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species. No mitigation is required.	na	LS	na	na	na	na
Impact AR-11. The Physical Control Component would have no impact on local policies or ordinances protecting aquatic resources.	na	N	na	na	na	na
Impact AR-12. The Physical Control Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	LS	na	na	na	na
Impact AR-13. The Vegetation Management Component would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	LS	na	na	na
Impact AR-14. The Vegetation Management Component would have a less-than-significant impact on any riparian habitat or other sensitive natural community. No mitigation is required.	na	na	LS	na	na	na
Impact AR-15. The Vegetation Management Component would not result in the direct removal, filling, or hydrological interruption of federally protected wetlands as defined by CWA Section 404. As such, this component would have a less-than-significant impact on these resources. No mitigation is required.	na	na	LS	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AR-16. The Vegetation Management Component would have a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species. No mitigation is required.	na	na	LS	na	na	na
Impact AR-17. The Vegetation Management Component would have no impact on local policies or ordinances protecting biological resources.	na	na	N	na	na	na
Impact AR-18. The Vegetation Management Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	na	LS	na	na	na
Impact AR-19. The Biological Control Component would have no impact , either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species.	na	na	na	N	na	na
Impact AR-20. The Biological Control Component would have no impact on any riparian habitat or other sensitive natural community.	na	na	na	N	na	na
Impact AR-21. The Biological Control Component would have no impact on federally protected wetlands as defined by CWA Section 404.	na	na	na	N	na	na
Impact AR-22. The Biological Control Component would have no impact on the movement of any native resident or migratory fish or wildlife species.	na	na	na	N	na	na
Impact AR-23. The Biological Control Component would have no impact on local policies or ordinances protecting biological resources.	na	na	na	N	na	na
Impact AR-24. The Biological Control Component would have no impact on approved HCPs, NCCPs, or local conservation plans.	na	na	na	N	na	na
Impact AR-25. The Chemical Control Component's mosquito larvicides would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AR-26. The Chemical Control Component’s mosquito adulticides and PBO would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na
Impact AR-27. The Chemical Control Component’s control of yellow jackets and ticks would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special- status species. No mitigation is required.	na	na	na	na	LS	na
Impact AR-28. The Chemical Control Component’s use of rodenticides would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na
Impact AR-29. The Chemical Control Component would have no impact on any riparian habitat or other sensitive natural community.	na	na	na	na	N	na
Impact AR-30. The Chemical Control Component would not result in the direct removal, filling, or hydrological interruption of federally protected wetlands as defined by CWA Section 404 and would have a have no impact on these resources.	na	na	na	na	N	N
Impact AR-31. The Chemical Control Component would have a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species. No mitigation is required.	na	na	na	na	LS	na
Impact AR-32. The Chemical Control Component would have no impact on local policies or ordinances protecting biological resources.	na	na	na	na	N	na
Impact AR-33. The Chemical Control Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AR-34. The Other Nonchemical Control/Trapping Component would have no impact , either directly or through habitat modifications, on any aquatic species identified as a candidate, sensitive, or special-status species.	na	na	na	na	na	N
Impact AR-35. The Other Nonchemical Control/Trapping Component would have no impact on any riparian habitat or other sensitive natural community.	na	na	na	na	na	N
Impact AR-36. The Other Nonchemical Control/Trapping Component would have no impact on federally protected wetlands as defined by CWA Section 404.	na	na	na	na	na	N
Impact AR-37. The Other Nonchemical Control/Trapping Component would have no impact on the movement of any native resident or migratory fish or wildlife species. Nor would it impact any native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	na	na	na	na	na	N
Impact AR-38. The Other Nonchemical Control/Trapping Component would have no impact on local policies or ordinances protecting biological resources.	na	na	na	na	na	N
Impact AR-39. The Nonchemical Control/Trapping Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	na	na	na	na	LS
5. Biological Resources – Terrestrial						
Impact TR-1. The Surveillance Component would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	LS	na	na	na	na	na
Impact TR-2. The Surveillance Component would have a less-than-significant impact on riparian habitat or other sensitive natural communities. No mitigation is required.	LS	na	na	na	na	na
Impact TR-3. The Surveillance Component would have a less-than-significant impact on federally protected wetlands as defined by Section 404 of the Clean Water Act. No mitigation is required.	LS	na	na	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact TR-4. The Surveillance Component would have no impact on the movement of any native resident or migratory fish or wildlife species, nor would it impact any native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	N	na	na	na	na	na
Impact TR-5. The Surveillance Component would have no impact on local policies or ordinances protecting biological resources.	N	na	na	na	na	na
Impact TR-6. The Surveillance Component has a less-than-significant impact on any adopted HCPs or NCCPs. No mitigation is required.	LS	na	na	na	na	na
Impact TR-7. The Physical Control Component, would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	LS	na	na	na	na
Impact TR-8. The Physical Control Component would have a less-than-significant impact on any riparian habitat or other sensitive natural community. No mitigation is required.	na	LS	na	na	na	na
Impact TR-9. The Physical Control Component would have a less-than-significant impact on federally protected wetlands as defined by CWA Section 404. No mitigation is required.	na	LS	na	na	na	na
Impact TR-10. The Physical Control Component would have a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species. No mitigation is required.	na	LS	na	na	na	na
Impact TR-11. The Physical Control Component would have no impact on local policies or ordinances protecting terrestrial resources.	na	N	na	na	na	na
Impact TR-12. The Physical Control Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	LS	na	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact TR-13. The Vegetation Management Component would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	LS	na	na	na
Impact TR-14. The Vegetation Management Component would have a less-than-significant impact on any riparian habitat or other sensitive natural community. No mitigation is required.	na	na	LS	na	na	na
Impact TR-15. The Vegetation Management Component would have a less-than-significant impact on federally protected wetlands as defined by CWA Section 404. No mitigation is required.	na	na	LS	na	na	na
Impact TR-16. The Vegetation Management Component would have a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species. No mitigation is required.	na	na	LS	na	na	na
Impact TR-17. The Vegetation Management Component would have no impact on local policies or ordinances protecting terrestrial resources.	na	na	N	na	na	na
Impact TR-18. The Vegetation Management Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	na	LS	na	na	na
Impact TR-19. The Biological Control Component would have no impact , either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species.	na	na	na	N	na	na
Impact TR-20. The Biological Control Component would have no impact on any riparian habitat or other sensitive natural community.	na	na	na	N	na	na
Impact TR-21. The Biological Control Component would have no impact on federally protected wetlands as defined by CWA Section 404.	na	na	na	N	na	na
Impact TR-22. The Biological Control Component would have no impact on the movement of any native resident or migratory fish or wildlife species.	na	na	na	N	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact TR-23. The Biological Control Component would have no impact on local policies or ordinances protecting biological resources.	na	na	na	N	na	na
Impact TR-24. The Biological Control Component would have no impact on approved HCPs, NCCPs, or local conservation plans.	na	na	na	N	na	na
Impact TR-25: The Chemical Control Component's mosquito larvicides would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na
Impact TR-26: The Chemical Control Component's mosquito adulticides and synergists would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na
Impact TR-27: The Chemical Control Component's use of pyrethrin, pyrethroids, pyrethroid-like pesticides, lambda-cyhalothrin, and potassium salts for yellow jacket wasp and/or tick control would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na
Impact TR-28: The Chemical Control Component's use of anticoagulant and other rodenticides would have a less-than-significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	LS	na
Impact TR-29. The Chemical Control Component would have no impact on any riparian habitat or other sensitive natural community.	na	na	na	na	N	na
Impact TR-30. The Chemical Control Component would have no impact on federally protected wetlands as defined by CWA Section 404.	na	na	na	na	N	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact TR-31. The Chemical Control Component would have a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species. No mitigation is required.	na	na	na	na	LS	na
Impact TR-32. The Chemical Control Component would have no impact on local policies or ordinances protecting terrestrial resources.	na	na	na	na	N	na
Impact TR-33. The Chemical Control Component would have a less-than-significant impact on adopted HCPs or NCCPs. No mitigation is required.	na	na	na	na	LS	na
Impact TR-34. The Other Nonchemical Control/Trapping Component would have a less-than-significant impact, either directly or through habitat modifications, on any terrestrial species identified as a candidate, sensitive, or special-status species. No mitigation is required.	na	na	na	na	na	LS
Impact TR-35. The Other Nonchemical Control/Trapping Component would have no impact on any riparian habitat or other sensitive natural community.	na	na	na	na	na	N
Impact TR-36. The Other Nonchemical Control/Trapping Component would have no impact on federally protected wetlands as defined by CWA Section 404.	na	na	na	na	na	N
Impact TR-37. The Other Nonchemical Control/Trapping Component would have no impact on the movement of any native resident or migratory fish or wildlife species.	na	na	na	na	na	N
Impact TR-38. The Other Nonchemical Control/Trapping Component would have no impact on local policies or ordinances protecting terrestrial resources.	na	na	na	na	na	N
Impact TR-39. The Nonchemical Control/Trapping Component would have no impact on adopted HCPs or NCCPs.	na	na	na	na	na	N

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
6. Ecological Health						
Impact ECO-1: The Surveillance Component would have a less-than-significant impact on nontarget ecological receptors, including native or special-status plants and animals and mitigation is not required.	LS	na	na	na	na	na
Impact ECO-2: The Physical Control Component would have a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	LS	na	na	na	na
Impact ECO-3: The nonherbicide option of the Vegetation Management Component in the form of physical removal would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	LS	na	na	na
Impact ECO-4: The use of several of the low toxicity herbicides would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	LS	na	na	na
Impact ECO-5: The use of glyphosate would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	LS	na	na	na
Impact ECO-6: The use of benfluralin would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	LS	na	na	na
Impact ECO-7: The use of adjuvants would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	LS	na	na	na
Impact ECO-8: Based on the potential uses by the District and the intended applications, the use of the herbicides oryzalin, triclopyr (TEA), and dithiopyr would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	LS	Na	na	na
Impact ECO-9: The use of mosquitofish as a Biological Control Component would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	LS	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact ECO-10: The use of bacterial larvicides would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-11: The use of methoprene for mosquito larvae would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-12: The use of surfactants for the control of mosquito larvae would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-13: The use of pyrethrins for adult mosquitoes, yellow jacket wasps, and ticks would result in a less-than-significant impact to nontarget ecological receptors including aquatic organisms and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-14: The use of pyrethroids and pyrethroid-like compounds (e.g., resmethrin, permethrin, and etofenprox) for mosquitoes, yellow jackets and wasps, and ticks would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-15: The use of the synergist PBO for mosquitoes, yellow jackets and wasps, and ticks would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-16: The use of the OP naled following label guidelines and using proven BMP techniques for mosquito control would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-17: The use of lambda-cyhalothrin for yellow jacket wasps (and paper wasps) would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-18: The use of potassium salts would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact ECO-19: The use of first- and second-generation anticoagulants would result in a less-than-significant impact to nontarget ecological receptors and no mitigation is required.	na	na	na	na	LS	na
Impact ECO-20: The use of the anticoagulant bromadiolone would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-21: The use of the anticoagulant difethialone would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-22: The use of the neurotoxin bromethalin would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-23: The use of cholecalciferol would results in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-24: The use of fumigants would result in a less-than-significant impact to nontarget receptors and mitigation is not required.	na	na	na	na	LS	na
Impact ECO-25: The Other Nonchemical Control/Trapping Component would result in a less-than-significant impact to nontarget ecological receptors and mitigation is not required.	na	na	na	na	na	LS
7. Human Health						
Impact HH-1: No impact would occur to human health from the use of the Surveillance Component.	N	na	na	na	na	na
Impact HH-2: Impacts to human health from use of the Physical Control Component would be less than significant and mitigation is not required.	na	LS	na	na	na	na
Impact HH-3: No impact would occur to human health from the nonherbicide Vegetation Management Component.	na	na	N	na	na	na
Impact HH-4: Impacts to human health from most of the herbicides of very low to low toxicity would be less than significant and mitigation is not required.	na	na	LS	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact HH-5: Impacts to human health from the use of glyphosate would be less than significant and mitigation is not required.	na	na	LS	na	na	na
Impact HH-6: Impacts to human health from the use of benfluralin would be less than significant and mitigation is not required.	na	na	LS	na	na	na
Impact HH-7: Impacts to human health from the use of pesticide adjuvants would be less than significant and mitigation is not required.	na	na	LS	na	na	na
Impact HH-8: Impacts to human health from the use of triclopyr would be less than significant and mitigation is not required.	na	na	na	N	na	na
Impact HH-9: No impact would occur to human health from the use of mosquitofish.						
Impact HH-10: No impact would occur to human health from the use of bacterial larvicides.	na	na	na	na	N	na
Impact HH-11: No impact would occur to human health from the use of the mosquito larvicide methoprene.	na	na	na	na	N	na
Impact HH-12: A less-than-significant impact would occur to human health from the use of alcohol ethoxylated, aliphatic solvent, and plant-derived oil surfactant larvicides. No mitigation is required.	na	na	na	na	LS	na
Impact HH-13: Impacts to human health from the use of pyrethrins for mosquito, yellow jacket wasp and tick control would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-14: Impacts to human health from the use of pyrethroids and pyrethroid-like compounds for mosquito, yellow jacket wasp, and tick control would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-15: Impacts to human health from the use of the synergist PBO in mosquito and yellow jacket wasp adulticides would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-16: Impacts to human health from the use of naled for mosquito control would be less than significant and mitigation is not required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact HH-17: Impacts to human health from the use of lambda-cyhalothrin would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-18: No impact would occur to human health from the use of potassium salts.	na	na	na	na	N	na
Impact HH-19: Impacts to human health from the use of anticoagulant rodenticides would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-20: Impacts to human health from the use of bromadiolone would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-21: Impacts to human health from the use of difethialone would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-22: Impacts to human health from the use of bromethalin would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-23: Impacts to human health from the use of cholecalciferol would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-24: Impacts to human health from the use of sulfur and sodium nitrate as fumigants would be less than significant and mitigation is not required.	na	na	na	na	LS	na
Impact HH-25: No impact would occur to human health from the District's use of the Other Nonchemical Control/Trapping Component.	na	na	na	na	na	N

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
8. Public Services and Hazard Response						
Impact PSH-1: Surveillance activities would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	N	na	na	na	na	na
Impact PSH-2: Surveillance activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, no impact would occur.	N	na	na	na	na	na
Impact PSH-3: Surveillance activities would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, the impact would be less than significant .	LS	na	na	na	na	na
Impact PSH-4: Physical control activities would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	na	N	na	na	na	na
Impact PSH-5: Physical control activities do not include the use of pesticides or herbicides; therefore, these activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore the impact would be less than significant .	na	LS	na	na	na	na
Impact PSH-6: Physical control activities would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, a less-than-significant impact would occur.	na	LS	na	na	na	na
Impact PSH-7: Vegetation management activities would not create a significant demand for police, fire, or health-care services. Therefore, no impact would occur	na	na	N	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact PSH-8: Vegetation management activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, the impact would be less than significant .	na	na	LS	na	na	na
Impact PSH-9: Vegetation management activities would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, the impact would be less than significant .	na	na	LS	na	na	na
Impact PSH-10: Biological control activities would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	na	na	na	N	na	na
Impact PSH-11: Biological control activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, a less-than-significant impact would occur.	na	na	na	LS	na	na
Impact PSH-12: Biological control activities would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, a less-than-significant impact would occur.	na	na	na	LS	na	na
Impact PSH-13: Chemical control activities would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	na	na	na	na	N	na
Impact PSH-14: Chemical control ground larviciding and adulticiding activities for mosquitoes would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, a less-than-significant impact would occur.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact PSH-15: Chemical control ground larviciding and adulticiding activities would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, a less-than-significant impact would occur.	na	na	na	na	LS	na
Impact PSH-16: Chemical control (aerial application) activities would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	na	na	na	na	N	na
Impact PSH-17: Chemical control (aerial application) activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, a less-than-significant impact would occur.	na	na	na	na	LS	na
Impact PSH-18: Chemical control (aerial application) activities would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, a less-than-significant impact would occur.	na	na	na	na	LS	na
Impact PSH-19: Chemical control for yellow jackets, ticks, and rodents would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	na	na	na	na	N	na
Impact PSH-20: Chemical control of yellow jackets, ticks, and rodents would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, a less-than-significant impact would occur.	na	na	na	na	LS	na
Impact PSH-21: Chemical control of yellow jackets, ticks, and rodents would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, a less-than-significant impact would occur.	na	na	na	na	LS	na
Impact PSH-22. Other Nonchemical Control/Trapping Component activities would not increase demand for police, fire, or health-care services. Therefore, no impact would occur.	na	na	na	na	na	N

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact PSH-23: The Other Nonchemical Control/Trapping Component would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, a less-than-significant impact would occur.	na	na	na	na	na	LS
Impact PSH-24: The Other Nonchemical Control/Trapping Component would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, a less-than-significant impact would occur.	na	na	na	na	na	LS
9. Water Resources						
Impact WR-1: The Surveillance Component collection devices would not contact nor interact with the environment. No impact would occur to surface water or groundwater.	N	na	na	na	na	na
Impact WR-2: The Physical Control Component's activities to modify water circulation, remove sediment, and maintain water control facilities to reduce habitat conditions for mosquito production would have a less-than-significant impact on water resources and no mitigation is required.	na	LS	na	na	na	na
Impact WR-3: Mechanical removal of vegetation from aquatic habitats would have a less-than-significant impact to surface water and no impact to groundwater resources.	na	na	LS, N	na	na	na
Impact WR-4: Application of the herbicides imazapyr, glyphosate, sulfometuron methyl, DCPA, modified vegetable oils, and lecithins would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	LS	na	na	na
Impact WR-5: Application of the herbicides triclopyr and oryzalin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	LS	na	na	na
Impact WR-6: For benfluralin and APEs, application of these herbicides would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	LS	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact WR-7: Application of dithiopyr would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	LS	na	na	na
Impact WR-8: The Biological Control Component's production of mosquitofish would have a less-than-significant impact on surface water and groundwater resources and no mitigation is required.	na	na	na	LS	na	na
Impact WR-9: The Biological Control Component's use of mosquitofish in man-made water features that are hydrologically isolated from receiving waters would have a less-than-significant impact on surface-water and groundwater resources. No mitigation is required.	na	na	na	LS	na	na
Impact WR-10: Application of the biological agents Bs, Bti, and spinosad would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-11: Application of methoprene would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-12: Application of the surfactant larvicides would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-13: Application of the synergist PBO would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-14: Application of pyrethrins would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-15: Application of d-trans allethrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-16: Application of permethrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact WR-17: Application of phenothrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-18: Application of prallethrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-19: Application of resmethrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-20: Application of tetramethrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-21: Application of deltamethrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-22: Application of esfenvalerate would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-23: Application of lambda-cyhalothrin would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-24: Application of etofenprox would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-25: Due to the toxicity of its breakdown product but its importance in the District's IMVMP Plan, the application of naled is considered a significant and unavoidable impact to surface water resources.	na	na	na	na	SU	na
Impact WR-26: Application of potassium salts (i.e., "soap salts") would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact WR-27: Application of chlorophacinone, diphacinone, brodifacoum, bromadiolone, difethialone, bromethalin, and cholecalciferol would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-28: Application of sulfur and sodium nitrate active ingredients in fumigant rodenticides would have a less-than-significant impact to surface water and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-29: The Nonchemical Control/Trapping Component collection techniques use tamper-resistant or baited traps, which limit the exposure of chemical-containing baits to the environment no impact would occur to surface water or groundwater.	na	na	na	na	na	N
10. Air Quality						
Impact AQ-1: Based on the general inclusion of Surveillance Component emissions in the SIP emission inventory and the compliance with applicable air regulations, the Surveillance Component would not conflict with applicable air quality plans. Impacts would be less than significant and no mitigation is required.	LS	na	na	na	na	na
Impact AQ-2: Based on estimated daily emissions for each criteria pollutant, the Surveillance Component would not violate an ambient air quality standard. Impacts would be less than significant and no mitigation is required.	LS	na	na	na	na	na
Impact AQ-3: Based on estimated daily emissions for each criteria pollutant, the Surveillance Component would not result in a cumulatively considerable increase of nonattainment pollutants. Impacts would be less than significant and no mitigation is required.	LS	na	na	na	na	na
Impact AQ-4: Based on the estimated daily emissions for each criteria pollutant, the Surveillance Component would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation is required.	LS	na	na	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AQ-5: The Surveillance Component would not subject people to objectionable odors. No impact would occur.	N	na	na	na	na	na
Impact AQ-6: Based on the general inclusion of Physical Control Component emissions in the SIP emission inventory and the compliance with applicable air regulations, the Physical Control Component would not conflict with applicable air quality plans. Impacts would be less than significant and no mitigation is required.	na	LS	na	na	na	na
Impact AQ-7: Based on estimated daily emissions for each criteria pollutant, the Physical Control Component would not violate an ambient air quality standard. Impacts would be less than significant and no mitigation is required.	na	LS	na	na	na	na
Impact AQ-8: Based on estimated daily emissions for each criteria pollutant, the Physical Control Component would not result in a cumulatively considerable increase of nonattainment pollutants. Impacts would be less than significant and no mitigation is required.	na	LS	na	na	na	na
Impact AQ-9: Based on the estimated daily emissions for each criteria pollutant, the Physical Control Component would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation is required.	na	LS	na	na	na	na
Impact AQ-10: The Physical Control Component would not subject people to objectionable odors. No impact would occur.	na	N	na	na	na	na
Impact AQ-11: Based on the general inclusion of Vegetation Management Component emissions in the SIP emission inventory and the compliance with applicable air regulations, the Vegetation Management would not conflict with applicable air quality plans. Impacts would be less than significant and no mitigation is required.	na	na	LS	na	na	na
Impact AQ-12: Based on estimated daily emissions for each criteria pollutant, the Vegetation Management Component would not violate an ambient air quality standard. Impacts would be less than significant and no mitigation is required.	na	na	LS	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AQ-13: Based on estimated daily emissions for each criteria pollutant, the Vegetation Management Component would not result in a cumulatively considerable increase of nonattainment pollutants. Impacts would be less than significant and no mitigation is required.	na	na	LS	na	na	na
Impact AQ-14: Based on the estimated daily emissions for each criteria pollutant, the Vegetation Management Component would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation is required.	na	na	LS	na	na	na
Impact AQ-15: The Vegetation Management Component would not subject people to objectionable odors. No impact would occur.	na	na	N	na	na	na
Impact AQ-16: Based on the general inclusion of Biological Control Component emissions in the SIP emission inventory and the compliance with applicable air regulations, the Biological Control Component would not conflict with applicable air quality plans. Impacts would be less than significant and no mitigation is required.	na	na	na	LS	na	na
Impact AQ-17: Based on estimated daily emissions for each criteria pollutant, the Biological Control Component would not violate an ambient air quality standard. Impacts would be less than significant and no mitigation is required.	na	na	na	LS	na	na
Impact AQ-18: Based on estimated daily emissions for each criteria pollutant, the Biological Control Component would not result in a cumulatively considerable increase of nonattainment pollutants. Impacts would be less than significant and no mitigation is required.	na	na	na	LS	na	na
Impact AQ-19: Based on the estimated daily emissions for each criteria pollutant, the Biological Control Component would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation is required.	na	na	na	LS	na	na
Impact AQ-20: The Biological Control Component would not subject people to objectionable odors. No impact would occur.	na	na	na	N	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AQ-21: Based on the general inclusion of Chemical Control Component emissions in the SIP emission inventory and the compliance with applicable air regulations, the Chemical Control Component would not conflict with applicable air quality plans. Impacts would be less than significant and no mitigation is required.	na	na	na	na	LS	na
Impact AQ-22: Based on estimated daily emissions for each criteria pollutant, the Chemical Control Component would violate an ambient air quality standard. Impacts would be less than significant and no mitigation is required.	na	na	na	na	LS	na
Impact AQ-23: Based on estimated daily emissions for each criteria pollutant, the Chemical Control Component would not result in a cumulatively considerable increase of nonattainment pollutants. Impacts would be less than significant and no mitigation is required.	na	na	na	na	LS	na
Impact AQ-24: Based on the estimated daily emissions for each criteria pollutant, the Chemical Control Component would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation is required.	na	na	na	na	LS	na
Impact AQ-25: The Chemical Control Component could subject people to objectionable odors. Impacts could be potentially significant but mitigable .	na	na	na	na	SM	na
Impact AQ-26: Based on the general inclusion of Other Nonchemical Control/Trapping Component emissions in the SIP emission inventory and the compliance with applicable air regulations, the Other Nonchemical Control/Trapping Component would not conflict with applicable air quality plans. Impacts would be less than significant and no mitigation is required.	na	na	na	na	na	LS
Impact AQ-27: Based on estimated daily emissions for each criteria pollutant, the Other Nonchemical Control/Trapping Component would not violate an ambient air quality standard. Impacts would be less than significant and no mitigation is required.	na	na	na	na	na	LS

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact AQ-28: Based on estimated daily emissions for each criteria pollutant, the Other Nonchemical Control/Trapping Component would not result in a cumulatively considerable increase of nonattainment pollutants. Impacts would be less than significant and no mitigation is required.	na	na	na	na	na	LS
Impact AQ-29: Based on the estimated daily emissions for each criteria pollutant, the Other Nonchemical Control/Trapping Component would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no mitigation is required.	na	na	na	na	na	LS
Impact AQ-30: The Other Nonchemical Control/Trapping Component would not subject people to objectionable odors. No impact would occur.	na	na	na	na	na	N
11. Greenhouse Gases and Climate Change						
Impact GHG-1: Based on estimated annual CO ₂ e emissions, the Surveillance Component would not result in a cumulatively considerable amount of GHGs, and neither would the incremental contribution of the District. Impacts would be less than significant and no mitigation is required.	LS	na	na	na	na	na
Impact GHG-2: Based on the general inclusion of Surveillance Component emissions in the local and statewide GHG emission inventories, the Surveillance Component would not conflict with applicable plans, policies, or regulations for reducing GHG emissions. Impacts would be less than significant and no mitigation is required.	LS	na	na	na	na	na
Impact GHG-3: Based on estimated annual CO ₂ e emissions, the Physical Control Component would not result in a cumulatively considerable amount of GHGs, and neither would the incremental contribution of the District. Impacts would be less than significant and no mitigation is required.	na	LS	na	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
<p>Impact GHG-4: Based on the general inclusion of Physical Control Component emissions in the local and statewide GHG emission inventories, the Physical Control Component would not conflict with applicable plans, policies, or regulations for reducing GHG emissions. Impacts would be less than significant and no mitigation is required.</p>	na	LS	na	na	na	na
<p>Impact GHG-5: Based on estimated annual CO2e emissions, the Vegetation Management Component would not result in a cumulatively considerable amount of GHGs, and neither would the incremental contribution of the District. Impacts would be less than significant and no mitigation is required.</p>	na	na	LS	na	na	na
<p>Impact GHG-6: Based on the general inclusion of Vegetation Management Component emissions in the local and statewide GHG emission inventories, the Vegetation Management Component would not conflict with applicable plans, policies, or regulations for reducing GHG emissions. Impacts would be less than significant and no mitigation is required.</p>	na	na	LS	na	na	na
<p>Impact GHG-7: Based on estimated annual CO2e emissions, the Biological Control Component would not result in a cumulatively considerable amount of GHGs, and neither would the incremental contribution of the District. Impacts would be less than significant and no mitigation is required.</p>	na	na	na	LS	na	na
<p>Impact GHG-8: Based on the general inclusion of Biological Control Component emissions in the local and statewide GHG emission inventories, the Biological Control Component would not conflict with applicable plans, policies, or regulations for reducing GHG emissions. Impacts would be less than significant and no mitigation is required.</p>	na	na	na	LS	na	na
<p>Impact GHG-9: Based on estimated annual CO2e emissions, the Chemical Control Component would not result in a cumulatively considerable amount of GHGs, and neither would the incremental contribution of the District. Impacts would be less than significant and no mitigation is required.</p>	na	na	na	na	LS	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
Impact GHG-10: Based on the general inclusion of Chemical Control Component emissions in the local and statewide GHG emission inventories, the Chemical Control Component would not conflict with applicable plans, policies, or regulations for reducing GHG emissions. Impacts would be less than significant and no mitigation is required.	na	na	na	na	LS	na
Impact GHG-11: Based on estimated annual CO2e emissions, the Other Nonchemical Control/Trapping Control Component would not result in a cumulatively considerable amount of GHGs, and neither would the incremental contribution of the District. Impacts would be less than significant and no mitigation is required.	na	na	na	na	na	LS
Impact GHG-12: Based on the general inclusion of Other Nonchemical Control/Trapping Control Component emissions in the local and statewide GHG emission inventories, the Other Nonchemical Control/Trapping Control Component would not conflict with applicable plans, policies, or regulations for reducing GHG emissions. Impacts would be less than significant and no mitigation is required.	na	na	na	na	na	LS
12. Noise						
Impact N-1: Use of equipment and vehicles under the Surveillance Component would increase noise levels during operations, but this increase would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity, resulting noise levels, and compliance with BMPs. No mitigation is required.	LS	na	na	na	na	na
Impact N-2: Use of equipment and vehicles under the Surveillance Component would cause a temporary increase in noise levels during operations. This increase would not be substantial and, therefore, is less than significant based on the frequency and duration of the activity, resulting noise levels, comparability to noise resulting from existing activities, and implementation of BMPs. No mitigation is required.	LS	na	na	na	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
<p>Impact N-3: Use of equipment and vehicles under the Physical Control Component would increase noise levels during operations, but this increase would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity and resulting noise levels. No mitigation is required.</p>	na	LS	na	na	na	na
<p>Impact N-4: Use of equipment and vehicles under the Physical Control Component would cause a temporary increase in noise levels during operations. This increase would not be substantial and, therefore, is less than significant based on the frequency and duration of the activity, resulting noise levels, comparability to noise resulting from existing activities, and implementation of BMPs. No mitigation is required.</p>	na	LS	na	na	na	na
<p>Impact N-5: Use of equipment and vehicles under the Vegetation Management Component would increase noise levels during operations, but this increase would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity and resulting noise levels. No mitigation is required.</p>	na	na	LS	na	na	na
<p>Impact N-6: Use of equipment and vehicles under the Vegetation Management Component would cause a temporary increase in noise levels during operations. This increase would not be substantial and, therefore, is less than significant based on the frequency and duration of the activity, resulting noise levels, comparability to noise resulting from existing activities, and implementation of BMPs. No mitigation is required.</p>	na	na	LS	na	na	na
<p>Impact N-7: Use of equipment and vehicles under the Biological Control Component would increase noise levels during operations, but this increase would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity and resulting noise levels. No mitigation is required.</p>	na	na	na	LS	na	na

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
<p>Impact N-8: Use of vehicles under the Biological Control Component would cause a temporary increase in noise levels during operations. This increase would not be substantial and, therefore, is less than significant based on the frequency and duration of the activity and resulting noise levels, and implementation of BMPs. No mitigation is required.</p>	na	na	na	LS	na	na
<p>Impact N-9: Use of equipment and vehicles under the Chemical Control Component would increase noise levels during operations, but this increase would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity and resulting noise levels. No mitigation is required.</p>	na	na	na	na	LS	na
<p>Impact N-10: Helicopter/aircraft use under the Chemical Control Component would temporarily increase noise levels during operations, but would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity and resulting noise levels. No mitigation is required.</p>	na	na	na	na	LS	na
<p>Impact N-11: Use of equipment and vehicles under the Chemical Control Component would cause a temporary increase in noise levels during operations. This increase would not be substantial and, therefore, is less than significant based on the frequency and duration of the activity, resulting noise levels, comparability to noise resulting from existing activities, and implementation of BMPs. No mitigation is required.</p>	na	na	na	na	LS	na
<p>Impact N-12: Helicopter/aircraft/airboat use under the Chemical Control Component would temporarily increase noise levels during operations, but this increase would not be substantial. This impact is less than significant based on the frequency and duration of the activity, resulting noise levels, and implementation of BMPs. No mitigation is required.</p>	na	na	na	na	LS	na
<p>Impact N-13: Use of equipment and vehicles under the Other Nonchemical Control/Trapping Component would increase noise levels during operations, but this increase would not exceed regulatory thresholds. This impact is less than significant based on the frequency and duration of the activity and resulting noise levels. No mitigation is required.</p>	na	na	na	na	na	LS

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical / Trapping
<p>Impact N-14: Use of equipment and vehicles under the Other Nonchemical Control/Trapping Component would cause a temporary increase in noise levels during operations. This increase would not be substantial and, therefore, is less than significant based on the frequency and duration of the activity, resulting noise levels, comparability to noise resulting from existing activities, and implementation of BMPs. No mitigation is required.</p>	na	na	na	na	na	LS

LS = Less-than-significant impact

N = No impact

na = Not applicable

SM = Potentially significant but mitigable impact

SU = Significant and unavoidable impact

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