

14 Other Required Disclosures

This section addresses other potential impacts as required by CEQA: significant environmental impacts that cannot be avoided if the Proposed Program is implemented, significant irreversible environmental changes that would be caused by the Proposed Program should it be implemented, and growth-inducing impacts of the Proposed Program (see CEQA Guidelines Section 15126.2).

14.1 Significant Unavoidable Impacts

Unavoidable impacts are those adverse environmental consequences of an action that cannot be avoided, either by changing the nature of the action or through mitigation if the action is undertaken.

14.1.1 No Program

CEQA Guidelines Section 15126.6(a) requires analysis of a no project alternative in a 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 any 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 herbicides, pesticides, and rodenticides or surveillance and application methods (heavy equipment and fixed-wing aircraft) to those currently in use. It does contain one air quality impact (objectionable odors) associated with existing chemical use that would be significant but can be mitigated to less than significant. No Program does not have the impact to surface water quality from the future use of naled (i.e., specifically naled’s breakdown product dichlorvos), and that impact is significant and unavoidable. See Section 15.5 for further explanation of these two impacts.

14.1.2 Proposed Program

The Proposed Program combines the Existing Program activities with the proposed future activities and chemicals to result in a single, comprehensive IMVMP. One of the Proposed Program components would result in potentially significant impacts to surface water resources that could not be reduced to less than significant with the implementation of mitigation measures. Under the Chemical Control Component, the option to use the mosquito adulticide naled is determined to be a significant and unavoidable impact to surface water resources, in part because it could impact a pesticide-impaired waterbody in the Program Area, namely lower San Mateo Creek. However, this creek is designated impaired for sediment toxicity most likely from permethrin, not naled. Naled is an OP insecticide and is used in rotation with pyrethrins or pyrethroids to avoid the development of resistance. Naled is the most commonly used material for this purpose, although District use would be infrequent due to IPM techniques and used only if resistance to the pyrethrins and pyrethroids is encountered. Naled has low water solubility but is mobile in soils with low organic matter content. It is moderately toxic to mammals, fish, and aquatic invertebrates but degrades readily in water, under sunlight, in soil under aerobic and anaerobic conditions, in air, and on plants. Dichlorvos, a breakdown product of naled, and itself a registered pesticide, may be present in toxic concentrations after naled is no longer detectable and is the primary reason for the determination of significant impact to surface water. However, naled is an important chemical that helps control resistance of

mosquitoes to component pesticide products such as pyrethrins and pyrethroids (should significant resistance be detected within the District's Program Area). Due to the toxicity of its breakdown product dichlorvos, with potential to impact a designated pesticide-impaired waterbody for a brief period, but its importance in the District's IMVMP Plan, the potential use of naled is a significant and unavoidable impact to surface water quality. However, the potential exposure to nontarget ecological receptors is minimal due to rapid degradation following ULV application, and the potential for adverse effects is so brief as to present a less-than-significant impact to nontarget aquatic species. Short-term exposure of aquatic nontarget species to naled and dichlorvos is possible but poses little to no potential unwanted toxicity to them. These factors and the rapid degradation makes the exposure minimal and the potential for unwanted effects a low likelihood. Even with the possibility of some unexpected or unwanted effects, the exposure to nontarget species is so brief as to present little impact to these nontarget populations' sizes, distribution, viability, or recovery. Recovery to this level of exposure is rapid, and the resulting impacts are inconsequential.

None of the Program components would result in potentially significant impacts to any other resources that could not be reduced to less than significant with the implementation of mitigation measures. In summary, there are no other significant unavoidable impacts.

14.2 Irreversible and Irretrievable Commitments of Resources

Irreversible commitments are those that cause either directly or indirectly the use of natural resources to the extent that they cannot be restored or returned to their original condition, including nonrenewable resources. Irreversible decisions can also affect renewable resources such as soils, wetlands, and waterfowl habitats. They are considered irreversible because their implementation would affect a resource that has deteriorated such that renewal takes extensive time or financial resources or because they would destroy a resource.

Irretrievable commitments of natural resources mean the decision would result in loss of production or use of the resources. They represent opportunities foregone for a substantial period of time that the resources cannot be used. Also, irreversible damage can result from environmental accidents associated with a project.

No irreversible or irretrievable commitments of land resources are associated with any of the Program components. For the Program components, potential irreversible and irretrievable impacts are associated with the consumption of energy resources by equipment and vehicles including ATVs and helicopters/airplanes, and the potential for environmental accidents associated with the application equipment and vehicles/aircraft. However, in practice as part of the District's IMVMP, the intermittent, limited, and short duration of use for these types of equipment allow energy resources to recover and is not expected to cause any irreversible or irretrievable impacts.

14.2.1 Energy Resources

Energy resources necessary for this Program would include gasoline and diesel fuel to power the vehicles and equipment at present and proposed for use in the District's mosquito and/or vector control activities. Equipment use for each of the six technical Program components is shown in Table 2-7. The Do Nothing Alternative would result in lower use of energy resources (than the Program components), because the fuel currently used in District vehicles for measures such as surveillance and inspection activities, physical control of habitat, vegetation management, and application of registered chemical treatments would not be used.

14.2.2 Environmental Accidents

The following environmental accidents could occur as a result of the implementation of Program surveillance, control, and pesticide/herbicide applications:

- > Aircraft crash
- > Vehicle crash including fuel spill

- > Misdirected spray from backpacks and truck-mounted equipment
- > Leakage of chemical pesticides from containers/improper disposal of containers

Chapter 8, Public Services and Hazard Response, addresses potential helicopter and fixed-wing aircraft crashes, and determines that none of the Program components would increase the risk of aircraft crashes. Chapter 8 also analyzes whether the Program would 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, and it determines that no increased risk of fuel spill would occur. Finally, Chapter 8 indicates that under each of the Program components, the District and its registered contractors would practice safe disposal of pesticide products, properly rinsed empty containers would safely and legally be disposed of at landfills, and any unused portions of Program chemicals would be disposed of at permitted hazardous waste collection locations. Adequate landfill and hazardous waste collection capacity exists in locations throughout the Program Area and, therefore, the Program would not exceed the existing capacity to safely dispose of these materials.

14.3 Growth-Inducing Impacts

CEQA Section 21100(b)(5) requires that an EIR discuss the growth-inducing impacts of a proposed project. This requirement is further explained in CEQA Guidelines Section 15126.2 (g), which states that an EIR must address “the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment.”

The Program components do not foster economic or population growth. Rather, they allow for communities within the Program Area to grow according to local general plans without local residents, workers, and visitors suffering from a variety of illnesses or discomfort from vector-borne diseases. Of concern are areas where human habitations are in close proximity to natural habitats providing ample opportunity for breeding populations of vectors or where home or business maintenance practices encourage vectors to breed. The District would continue its IMVMP, and no change in economic activity would occur. Therefore, the Program would not directly or indirectly stimulate economic or population growth and would not induce additional jobs or population in the Program Area.

14.4 Energy Requirements and Conservation Measures

Energy resources necessary for this Program would include gasoline and diesel fuel to power the vehicles, aircraft, and equipment proposed for use in the Program activities. No additional electrical power would be required. All equipment used in Program implementation would be kept up to date with maintenance requirements and would be used as efficiently as possible (i.e., minimize idling).

With regard to vehicles associated with Program surveillance, control, and treatment activities, the District is doing now or committed to the following: (1) maintain vehicle tire pressure to manufacturer specifications; (2) inspect and reinflate tires at regular intervals; (3) use lower-carbon fuels such as biodiesel blends where feasible; (4) encourage ride sharing when transporting work crews from the base operations to the job site; (5) limit idling time of all vehicles and equipment; (6) service and maintain all equipment according to manufacturer’s instructions to remain in good working order; and (7) use engine retrofits such as diesel particulate matter filters with diesel oxidation catalysts where feasible. District BMP A14 addresses several of these measures.

With regard to portable offroad sources, when feasible, the District utilizes electrically or manually powered hydraulic spray equipment rather than gas- or diesel-powered equipment.

These energy conservation measures would have the benefit of reducing GHG emissions the Program generates. All impacts to climate change from GHG emissions are less than significant (LS) compared to existing conditions and require no mitigation. As an option, the District may choose to reduce small impacts even further with the following measure: Where practicable and available, the Program will use alternatively fueled equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), liquefied petroleum/propane gas (LPG), electric or biodiesel.