6 Revisions to Draft PEIR

6.1 Introduction

This chapter presents minor revisions to text and appendices based on comments received or errors/errata discovered by the Draft PEIR preparers and/or District staff. None of these text changes or additions result in any changes to the conclusions and determinations of significant impact. In other words, no "less than significant" impacts were changed to "potentially significant" or "significant and unavoidable" impacts.

6.2 Text Revisions in Response to Draft PEIR Comments or District Identified Errors and Omissions/Clarifications

The sections below explain both content clarifications and typographical and transcriptional errors that were identified since the public release of the Integrated Vector Management Program, Programmatic EIR on August 13, 2015. Material to be added is underlined; material to be deleted is shown with ~~strikethrough font~~.

6.2.1 Summary

Under Section S.6 Summary of Environmental Impacts, the Summary Table S-2, Section 10. Air Quality, Mitigation Measures column (page S-15), the introduction to the measures is revised for clarity:

> "To mitigate Impact AQ-25, the District and its contractors ~~may~~ shall implement ~~any~~ one or more of the following measures as applicable to the specific application situation to reduce drift towards human populations/residences from the ground and aerial application of odorous treatment compounds:"

6.2.2 Chapter 1, Introduction

In Section 1.1.3.1.1, Cooperative Agreement between the California Department of Public Health and Local Vector Control Agencies, on page 1-7, the following typographical error is corrected.

> In 2015, CDFW determined that CDPH, and the districts operating under a valid Cooperative Agreement with CDPH to conduct surveillance, prevention, or control of vectors and vector-borne diseases, are not required to obtain a scientific collecti~~ons~~ng permit (SCP) under Fish and Game Codes Sections 1002, 4005(e), and 4011. A SCP is required for any scientific study conducted by or in collaboration with CDPH or local agencies, which is not routine surveillance and control activities and includes take of animals or plants. (CDFW 2015)

6.2.3 Chapter 2, Program Description

Section 2.3.2.1 (page 2-11) includes the following text (with typographical errors and omissions corrected).

> "The District performs these physical control activities in accordance with all appropriate environmental regulations (e.g., wetland fill and dredge permits, endangered species review, water quality review, streambed alteration permits, see Section 2.~~7~~8), and in a manner that generally maintains or improves habitat values for desirable species. Major physical control activities or projects (beyond the scope of the District's 5-year regional wetlands permits with the United States Army Corps of Engineers (USACE), San Francisco Bay Regional Water Quality Control Board (RWQCB), State Water Resources Control Board (SWRCB), and San Francisco Bay Conservation and Development

Commission (BCDC) are not addressed under this PEIR (because they are not known at this time). Minor physical control activities (covered by the regional wetlands permits) are addressed in this PEIR. They vary substantially from year to year, but typically consist of up to 10,000 linear feet of ditch maintenance. Under the regional permits, the District's work plans are reviewed annually by trustee and other responsible agencies prior to initiation of the planned work. USACE, USFWS, CDFW, and other responsible agencies can inspect documentation of proposed and completed work.

In Section 2.4 Education, the PEIR text has been modified on page 2-41 to clarify the applicable exemptions (shown below).

Public education is a key component of the District's IVMP that is used to encourage and assist reduction and prevention of vector habitats on private and public property. This component includes educational or training programs that involve no physical alteration in the area affected. While this component is a critical element of the District's Program, public education activities are categorically exempt from CEQA review (CEQA Guidelines Section 15322) based on a finding by the State Secretary of Resources that these activities do not have a significant effect on the environment. ~~Therefore, these educational activities will not be further reviewed in this document.~~ Under Article 19, Categorical Exemptions, maintenance of existing landscaping and minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use is covered in Section 15301, Existing Facilities. A discussion of exempt and nonexempt educational activities is provided in the following paragraphs.

Section 2.8.1.3 on the NPDES Pesticide Permits should be replaced with the three descriptions provided in Section 9.1.2.2.8 on pages 9-13, 9-14, and 9-15:

2.8.1.3 Statewide ~~General~~ NPDES Pesticide Permits ~~for Algae and Aquatic Weed Control~~

~~This General Permit regulates the discharge of aquatic pesticides (algaecides and aquatic herbicides) used for algae and aquatic weed control to waters of the United States. These are algaecides and aquatic herbicides with registration labels that explicitly allow direct application to water bodies. This General Permit became effective on December 1, 2013.~~

~~Except for discharges on tribal lands that are regulated by a federal permit, this General Permit covers the point source discharge to waters of the United States of residues resulting from pesticide applications using products containing 2,4-D, acrolein, copper, diquat, endothall, fluridone, glyphosate, imazamox, imazapyr, penoxsulam, sodium carbonate peroxyhydrate, and triclopyr-based algaecides and aquatic herbicides, and adjuvants containing ingredients represented by the surrogate nonylphenol. This General Permit covers only discharges of algaecides, and aquatic herbicides that are currently registered for use in California, or that become registered for use and contain the above-listed active ingredients and ingredients represented by the surrogate of nonylphenol.~~

~~A Discharger under this General Permit includes any entity involved in the application of algaecides and aquatic herbicides that results in a discharge of algaecides and aquatic herbicides and their residues and degradation byproducts to waters of the United States, and meets either or both of the following two criteria:~~

- ~~The entity has control over the financing for or the decision to perform algaecide and aquatic herbicide applications that result in discharges, including the ability to modify those decisions; or~~
- ~~The entity has day-to-day control of algaecide and aquatic herbicide applications or performs activities that are necessary to ensure compliance with this General Permit. For example, the~~

~~entity is authorized to direct workers to carry out activities required by this General Permit or perform such activities themselves.~~

In response to a Sixth Circuit Court decision in 2009 that the application of pesticides at, near, or over waters of the US that results in discharges of pollutants requires coverage under a NPDES permit, the SWRCB adopted four Pesticide Permits. The first two are applicable to the Program. The Spray Applications Permit is also relevant to the regulatory setting when the District performs pesticide applications for the CDFA and/or USFS.

> Statewide NPDES Vector Control Permit. The Statewide NPDES Permit for Biological and Residual Pesticide Discharges to waters of the US from Vector Control Applications (SWRCB Water Quality Order No. 2011-0002-DWQ with amendments; NPDES No. CAG 990004; Vector Control Permit) covers the point source discharge of biological and residual pesticides resulting from direct and spray applications for vector control. The District completed application requirements, including preparation of a Pesticide Application Plan (PAP) and public notice requirements, and received permit approval on October 31, 2011. Permitted larvicide active ingredients include monomolecular films, methoprene, *Bacillus thuringiensis* subspecies *israelensis* or Bti, *Bacillus sphaericus* or Bs, temephos, petroleum distillates, and spinosad. Permitted adulticide active ingredients include malathion, naled, pyrethrin, deltamethrin, lambda-cyhalothrin, permethrin, resmethrin, sumithrin, prallethrin, the synergist PBO, etofenprox, and N-octyl bicycloheptene dicarboximide (MGK-264). The permit also includes language that allows adulticides and larvicides that are newly registered in California and that are based on active ingredients currently registered by CDPR to be used for vector control without having to further amend the permit. The permit contains a receiving water limitation for malathion and receiving water monitoring triggers for the other active ingredients. To obtain coverage under the permit, each discharger (typically a vector control district) must submit a Notice of Intent, application fee, and PAP, which is subject to approval by the SWRCB following a 30-day public comment period.

  The PAP serves as a comprehensive plan developed by the discharger that describes the project, the need for the project, what will be done to reduce water quality impacts, and how those impacts will be monitored. The PAP must include a description of application and target areas, evaluation of available BMPs, and description of BMPs to be implemented. The PAP must include a discussion of the factors influencing the decision to select pesticide applications for vector control, the pesticide products or types expected to be used, and any known degradation by-products. The PAP also includes the methodology used to determine how much pesticide is needed and how this amount was determined, the methods in which pesticides are to be applied, and any adjuvants or surfactants that will be used.

  Permittees must comply with the Vector Control Permit Monitoring and Reporting Program (MRP). Visual monitoring may be required during and after pesticide applications, when safe and feasible, to visually assess the area in and around where pesticides are applied for possible and observable adverse incidents. Monitoring of application rates is also required. Adverse incidents must be reported to the RWQCB within 24 hours of identification. Within 30 days a written report must be submitted, which includes a description of actions to be taken to prevent recurrence of adverse incidents. The District submits annual reports that include a description of the type of pesticide used, the quantity used, the location of where the pesticide is used, submittal of documentation such as the Pesticide Application Logs, and review of their PAP.

> Statewide NPDES Aquatic Weed Control Permit. The Statewide General NPDES Permit for Residual Aquatic Pesticide Discharges to Waters of the US from Algae and Aquatic Weed Control Applications (SWRCB Water Quality Order No. 2013-0002-DWQ with amendments;

NPDES No. CAG 990005; Aquatic Weed Control Permit) addresses the discharge of residues resulting from pesticide applications using products containing 2,4-D, acrolein, copper, diquat, endothall, fluridone, glyphosate, imazamox, imazapyr, penoxsulam, sodium carbonate peroxyhydrate, triclopyr-based algicides and aquatic herbicides, and adjuvants containing ingredients represented by nonylphenol. The permit contains receiving water limitations for 2,4-D, acrolein, copper, diquat, endothall, fluridone, glyphosate, nonylphenol, toxicity, and dissolved oxygen. The permit also includes receiving water monitoring triggers for imazapyr and triclopyr triethylamine. To obtain coverage under the permit, a discharger must submit a Notice of Intent, application fee, and a vicinity map to the appropriate RWQCB. Effluent limitations contained in the Aquatic Weed Control Permit require that the discharge of residual algicides and aquatic herbicides meet applicable water quality standards, require implementation of BMPs, and include requirements to develop and implement an Aquatic Pesticide Action Plan (APAP).

The APAP must describe appropriate BMPs, including compliance with all pesticide label instructions, and a monitoring plan that meets the requirements of the permit MRP. Monitoring requirements include background, event, and post-event sampling for visual, physical, and chemical constituents for each type of aquatic pesticide used for each type of site (flowing water and nonflowing water). Annual reports must summarize monitoring data and address the effectiveness of the APAP to reduce or prevent the discharge of pollutants associated with aquatic pesticide applications. Other specific requirements of the APAP include a description of the waterbody(ies) or waterbody systems being controlled and a description of what weed(s) are being controlled and why. The APAP also serves as a discussion of control tolerances (i.e., how much growth can occur before action is necessary) and of the factors influencing the decision to use aquatic pesticides in regards to those tolerances (pros and cons). The types of pesticides and adjuvants that are used and the methodology used to determine the amount of product to be applied are also detailed within an APAP. Finally, the APAP should have a description of application and treatment areas within the system and, if applicable, a list of gates or control structures and their inspection schedule to ensure they are not leaking.

> Statewide NPDES Spray Applications Permit. The Statewide General NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the US from Spray Applications (SWRCB Water Quality Order No. 2011-0004-DWQ; NPDES No. CAG 990007; Spray Applications Permit) addresses spray applications of insecticides and herbicides by CDFA and USFS. Under the permit, CDFA is covered for applications of acetamiprid, aminopyralid, *Bacillus thuringiensis*, subspecies *kurstaki* (*Btk*), carbaryl, chlorsulfuron, clopyralid, cyfluthrin, dinotefuran, glyphosate, imazapyr, imidacloprid, malathion, naled, nuclear polyhedrosis virus (NPV), pheromone, pyrethrins, spinosad A and D, triclopyr butoxyethyl ester (BEE), and triclopyr triethylamine salt (TEA). USFS is covered for applications of biological control agents, which is a subset of the CDFA active ingredients.

The permit contains a receiving water limitation for malathion and receiving water monitoring triggers for many of the other active ingredients. To obtain coverage under the permit, the discharger must submit a Notice of Intent, application fee, and a project- or program-specific PAP to the SWRCB. The PAP must describe the application area, appropriate BMPs for each pesticide project, an evaluation of possible alternatives to pesticide use, and a monitoring plan. The PAP must also include an Off-Target Drift Management Plan. Monitoring requirements include background and event monitoring for visual, physical, and chemical parameters at frequencies similar to the Vector Control Permit. Annual reports must summarize sampling results and recommend improvements to the monitoring program, BMPs, and PAP.

Section 2.8.1.7 is added to provide a description of the District's most recent Lake and Streambed Alteration Agreement with CDFW.

Section 2.8.1.7 Lake and Streambed Alteration Agreement

The District had a LSAA with CDFW (CDFW 2010) that covered work in habitats under CDFW jurisdiction under Section 1600 of the Fish and Game Code at 97 sites in Sonoma and Marin Counties. The 2010 LSAA listed 59 sites in Sonoma County and 28 sites in Marin County, mostly riparian zones/creeks, seasonal low areas, drainage ditches, wetlands and ponds. This LSAA was amended in 2012 and 2013 to add an additional 10 sites. These sites represent areas of active mosquito surveillance and limited vegetation removal. The LSAA covers maintenance of access into riparian zones, and beds and basins of creeks, seasonal depressions and low areas, seasonal wetlands, ponds, and storm water drainage ditches to perform mosquito surveillance, mosquito-borne disease surveillance, and mosquito control at all 97 sites. Covered project activities include:

> Minor trimming of vegetation (generally 3-inches diameter or less)

> Trimming of overhanging limbs and brush

> Removal of small sections of downed trees or limbs within channels

> Mowing

The permit contains specific avoidance and minimization measures and requires written notification of maintenance projects completed annually with reports due by June 30. It also has requirements that inform the BMPs. Permit requirements state that activities are to be conducted from October 1 through April 30, and the District attempts to complete the work prior to the onset of seasonal rainfall. (CDFW 2010[1]). The LSAA expired December 31, 2014, and will be renewed.

In Section 2.9, Best Management Practices, the following changes are made to page 2-54.

Subsequent environmental impact assessments in this PEIR reflect the continued use of these measures, which are organized under the following categories and listed in Table 2-6:

> General BMPs

> Tidal Marsh-Specific BMPs

> Salt Marsh Harvest Mouse (SMHM)

> Ridgway's Rail (RIRA)

> Soft Bird's Beak (SBB)

> Vegetation Management

> Maintenance/Construction and Repair of Channels, Tide Gates and Water Structures in Waters of the U.S and State.

> Applications of Pesticides, Surfactants, and/or Herbicides

> Hazardous Materials and Spill Management

> Worker Illness and Injury Prevention Program and Emergency Response.

[1] California Department of Fish and Wildlife (CDFW). 2010. Final Lake or Streambed Alteration Agreement, No. 1600-2010-0252-R3. Public Health/Mosquito Control Access Maintenance. Amended March 5, 2012 and October 14, 2013 by Erik Hawk, MSMVCD.

In Table 2-6, the following changes have been incorporated to reflect responses to comments.

The following modification to BMP A1 is made (page 2-57):

> District staff has had long standing and continues to have cooperative, collaborative relationships with federal, state, and local agencies and with special interest groups and land managers/owners. The District regularly communicates with agencies, organizations, and land managers/owners regarding the District's operations and/or the necessity and opportunity for increased access for surveillance, source reduction, habitat enhancement, and the presence of special status species and wildlife. The District often participates in and contributes to interagency and special interest group projects. The District will continue to foster these relationships, communication, and collaboration.

BMP A10 (page 2-58) has been revised to include invasive animal species such as New Zealand mud snails and amphibian pathogens such as the chytrid fungus.

> Properly train all staff, contractors, and volunteer help to prevent spreading weeds and ~~pests~~invasive animal species (e.g., New Zealand mud snails) or pathogens (e.g., the fungus that causes chytridiomycosis in amphibians) to other sites. The District headquarters contains wash rack facilities (including high-pressure washers) to regularly (in many cases daily) and thoroughly clean equipment to prevent the spread of weeds. In addition, MSMVCD will provide equipment, such as an air compressor, to clean equipment in the field when there is a concern about the transfer of weed seeds. Decontamination methods to clean equipment and personnel clothes, such as boots, of invasive species and pathogens will be included in worker training and be implemented when working in wetlands in different watersheds.

BMP F6 (page 2-63) has been revised below as requested by CDFW.

> Vegetation management work will be generally confined to October 1 to April 30 to minimize potential impacts to sensitive species, especially breeding birds. ~~When~~ If work is expected to occur between February 1 and ~~April 30~~ August 31 (nesting season for migratory birds), additional consultations will occur with appropriate resource agencies to help identify locations of active nests of raptors or migratory birds as well as any additional protection measures that will need to be implemented prior to commencement of work.

BMP F9 (page 2-64) has been revised as indicated below:

> Within suitable habitat for California Freshwater Shrimp (*Syncaris pacifica*), no in-channel vegetation will be removed, trimmed, or otherwise disturbed. District staff will work with resource agencies to determine locations of suitable habitat for California Freshwater Shrimp and receive written authorization from USFWS to proceed prior to commencement of vegetation management activities.

BMP F 10 (page 2-64) has been revised as indicated below:

> If suitable habitat ~~necessary~~for special-status species is found, including vernal pools, and if nonchemical physical and vegetation management control methods have the potential for affecting special-status species, then the District will coordinate with the CDFW, USFWS, and/or NMFS, as appropriate, before conducting control activities within this boundary or cancel activities in this area. If the District determines no suitable habitat is present, control activities may occur without further agency consultations.

Category G of the BMPs (page 2-64) has been modified to:

> G. Maintenance / Construction and Repair of Channels, Tide Gates, and Water Structures in Waters of the U.S. and State

BMP G9 (page 2-66) has been modified as indicated below:

> Discharges of dredged or fill material into tidal waters will be minimized or avoided to the maximum extent possible at the project site and will be consistent with all permit requirements for such activity. No discharge of unsuitable material (e.g., trash) will be made into waters of the United States or State of California, and material that is discharged will be free of toxic pollutants in toxic amounts (see section 307 of the Clean Water Act). Measures will be taken to avoid disruption of the natural drainage patterns in wetland areas.

BMP H10 (page 2-68) is modified as indicated below:

> Special-Status Aquatic Wildlife Species:
>
> > Suitable habitat will be determined using methods such as recent aerial photographs, results of previous survey data from scientific literature or reports, site-specific survey data, and databases such as CNDDB.
>
> > A CNDDB search was conducted in 2012 and the results incorporated into Appendix A for this PEIR. An update was completed in November 2014 and the results incorporated into Section 4.1.2 of this PEIR. District staff communicates with state, federal, and county agencies regarding sites that have potential to support special status species. Many sites where the District performs surveillance and control work have been visited by staff for many years and staff is highly knowledgeable about the sites and habitat present. If new sites or site features are discovered that have potential to be habitat for special status species, the appropriate agency and/or landowner is contacted and communication initiated.
>
> > Use only pesticides, herbicides, and adjuvants approved for aquatic areas or manual treatments within a predetermined distance from aquatic features (e.g., within 15 feet of aquatic features). Aquatic features are defined as any natural or man-made lake, pond, river, creek, drainage way, ditch, spring, saturated soils, or similar feature that holds water at the time of treatment or typically becomes inundated during winter rains.
>
> > If suitable habitat for special status species is found, including vernal pools, and if aquatic-approved pesticide, herbicide, and adjuvant treatment methods have the potential for affecting the potential species, then the District will coordinate with the CDFW, USFWS, and/or National Marine Fisheries Service (NMFS) before conducting treatment activities within this boundary or cancel activities in this area. If the District determines no suitable habitat is present, treatment activities may occur without further agency consultation.

These BMPs are repeated in many of the resource chapters and are hereby modified as well.

6.2.4 Chapter 4, Biological Resources - Aquatic

The corrections to Table 4-4 on pages 4-36 and 4-37 are:

> California black rail: remove X under FW Marsh/Seeps
>
> ~~California clapper~~Ridgway's rail

The text in Section 4.1.3.1.6 Stipulated Injunction and Order, Protection of California Red-Legged Frog from Pesticides, on page 4-42, has been corrected as indicated below.

> Of the 66 pesticides listed in the injunction, the District may employ esfenvalerate~~,~~ and methoprene, ~~and permethrin~~ for vector control. Esfenvalerate may be used for yellow-jacket and wasp control in response to public complaints. Methoprene is used for larval mosquito control ~~and permethrin is may be used for adult mosquito control~~. However, vector control programs are exempt. Specifically, for applications of a pesticide for purposes of public health vector control under a program administered by a public entity, the injunction does not apply. The District may

use the following herbicides listed in the injunction: glyphosate, imazapyr, and triclopyr. Where used for vegetation management for control of mosquito-breeding habitat, the injunction would not apply.

Section 4.1.4.5 Bay Delta Conservation Plan, has been removed from pages 4-48 and 4-49.

~~The BDCP is an HCP being developed as part of California's overall water management portfolio. It is being developed as a 50-year habitat conservation plan with the goals of restoring the Sacramento-San Joaquin River Delta (Delta) ecosystem and securing California water supplies. The plan area encompasses the legal Delta and surrounding areas (Solano, Yolo, Contra Costa, San Joaquin and Sacramento counties). It does not border Marin or Sonoma Counties, but does encompass parts of adjoining Solano County. The activities covered under the BDCP include improvements to water infrastructure facilities in and around the Delta and the protection of approximately 150,000 acres of habitat to address the Delta's environmental challenges. The BDCP includes 22 conservation measures aimed at improving water operations, protecting water supplies and water quality, and restoring the Delta ecosystem within a stable regulatory framework (BDCP 2014).~~

~~The BDCP seeks coverage for 56 species and identifies conservation measures designed to contribute to their protection and recovery. The plan includes 67 goals and 165 objectives that form the basis of the conservation strategy, which includes landscape scale, natural community and biological and species specific goals and objectives. The BDCP also includes 37 AMMs that are incorporated into covered activities to minimize the effects of these actions on various resources. Many of these AMMs focus on minimizing the general environmental effects of construction activities and many others are species specific AMMs.~~

~~AMM 33 Mosquito Management calls for management and control of mosquitoes during construction of project facilities. The HCP Implementation Office will accomplish this through consultation with appropriate mosquito and vector control districts and will carry out mosquito control activities as necessary and applicable. The types of mosquito control activities that may be carried out under this AMM include surveillance, biological controls, physical controls, vegetation management, and use of larvicides and adulticides, as necessary.~~

In Section 4.2.2.6 of the Draft PEIR, the following statement on page 4-75 on predator populations is modified as indicated for greater clarity:

"Mosquitoes are part of the food web and their loss may reduce the food base for some predators. Although mosquitoes serve a role as one of many types of prey items for some fish, avian insectivores, bats, and small reptiles and amphibians, the reduction of mosquito abundance over a small area will not affect the predator populations overall because these species generally have large foraging ranges and can find~~, as~~ other prey sources within the range of their habitat use ~~are available~~." (Williams et al, 1994)[2]

6.2.5 Chapter 5, Biological Resources - Terrestrial

Section 5.1.4.5 Bay Delta Conservation Plan, has been removed from pages 5-28 and 5-29.

~~The BDCP is an HCP being developed as part of California's overall water management portfolio. It is being developed as a 50-year habitat conservation plan with the goals of restoring the Sacramento-San Joaquin River Delta (Delta) ecosystem and securing California water supplies. The plan area encompasses the legal Delta and surrounding areas (Solano, Yolo, Contra Costa, San Joaquin and Sacramento counties). It does not border Marin or Sonoma Counties, but does encompass parts of adjoining Solano County. The activities covered under the BDCP include~~

[2] Williams. B. et al., eds. 1994. Assessing Pesticide Impacts on Birds. Final Report of the Avian Effects Dialogue Group, 1988-1993. RESOLVE, Center for Environmental Dispute Resolution.

~~improvements to water infrastructure facilities in and around the Delta and the protection of approximately 150,000 acres of habitat to address the Delta's environmental challenges. The BDCP includes 22 conservation measures aimed at improving water operations, protecting water supplies and water quality, and restoring the Delta ecosystem within a stable regulatory framework (BDCP 2014).~~

~~The BDCP seeks coverage for 56 species and identifies conservation measures designed to contribute to their protection and recovery. The plan includes 67 goals and 165 objectives that form the basis of the conservation strategy, which includes landscape scale, natural community and biological and species specific goals and objectives. The BDCP also includes 37 AMMs that are incorporated into covered activities to minimize the effects of these actions on various resources. Many of these AMMs focus on minimizing the general environmental effects of construction activities and many others are species specific AMMs.~~

~~AMM 33 Mosquito Management calls for management and control of mosquitoes during construction of project facilities. The HCP Implementation Office will accomplish this through consultation with appropriate mosquito and vector control districts and will carry out mosquito control activities as necessary and applicable. The types of mosquito control activities that may be carried out under this AMM include surveillance, biological controls, physical controls, vegetation management, and use of larvicides and adulticides, as necessary.~~

6.2.6 Chapter 10, Air Quality

The following text change from Section 10.2.7 Chemical Control Alternative on page 10-32 will be carried into Section 10.2.11 (page 10-41) and Summary Table S-2 (page S-15).

"To mitigate Impact AQ-25, the District and its contractors ~~may~~ shall implement ~~any~~ one or more of the following measures as applicable to the specific application situation to reduce drift towards human populations/residences from the ground and aerial application of odorous treatment compounds:"

6.2.7 Chapter 15, Alternatives

Under Section 15.3 No Program, on pages 15-2 and 15-3, the following material is added after the third bullet at the bottom of page 15-2:

…The No Project/No Program condition assumes that the current activities would cease and result in a "do nothing" alternative going forward. Key assumptions for the future No Program 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 IVMP, the responsibility for vector management could fall on CDPH (or some other agency), who would not provide mosquito and vector control support or "oversight" to local jurisdictions (from Sacramento) given lack of personnel, equipment, or funding. Management at the state level would likely be only reactive rather than proactive.

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[3]). The UC Statewide Integrated Pest Management (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 than in any other area.

> 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.

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 of the No Program assumptions, 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.

[3] Flint, M.L. 2003. Residential Pesticide Use in California: A Report of Surveys taken in the Sacramento (Arcade Creek), Stockton (Five-Mile Slough), and San Francisco Bay Areas with Comparisons to the San Diego Creek Watershed of Orange County, California. Prepared for the CDPH. Director, IPM Education and Publications and Extension Entomologist, University of California Statewide IPM Program, University of California Davis. March 15.

6.2.8 Chapter 17. References

The following references were updated for new hyperlinks, and the previous hyperlinks are not shown. Also, additional references cited in this chapter are included.

Bay Area Air Quality Management District (BAAQMD). 2009. Revised Draft Options and Justification Report, CEQA Thresholds of Significance. Available online at http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/revised-draft-ceqa-thresholds-justification-report-oct-2009.pdf?la=en.

~~Bay Delta Conservation Plan (BDCP) 2014. Available online at http://baydeltaconservationplan.com/Library/BDCPLibrary/WhatistheBDCP.aspx~~.

California Department of Fish and Wildlife (CDFW). 2010. Final Lake or Streambed Alteration Agreement, No. 1600-2010-0252-R3. Public Health/Mosquito Control Access Maintenance. Amended March 5, 2012 and October 14, 2013 by Erik Hawk, MSMVCD.

California Environmental Data Exchange Network. (CEDEN). 2013. Pyrethroid and Pesticide Data Query from March 02, 1993 to June 27, 2012. Available online at http://www.ceden. .waterboards.ca.gov/AdvancedQueryTool).

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