

Other Required Disclosures

This section addresses other potential impacts as required by CEQA: significant environmental effects 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). Energy requirements and potential conservation measures are addressed in Chapter 6, Air Quality, and Chapter 13, Greenhouse Gases and Climate Change, but are summarized here.

15.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Unavoidable adverse impacts are those 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. Significant impacts from No Program are assumed to be not mitigable in most cases, because an action that is currently unplanned and/or unfunded would be required to resolve the impact. Furthermore, the No Program actions to implement quarantines or treat for LBAM infestations would be undertaken by private businesses and landowners, not by governmental agencies.

15.1.1 No Program

Potential exists for substantial adverse effects throughout California if LBAM is allowed to spread and establish throughout agricultural areas, forested areas, horticultural operations, and urban areas. Statewide impacts under the No Program Alternative have the potential to be significant and unavoidable for agriculture and horticultural economics, urban and rural land uses, noise, odor, human health, aquatic resources, terrestrial resources, water resources, and ecological health as discussed in Chapters 3, 4, 5, 6, 8, 9, 10, 11, and 12, respectively.

15.1.2 Proposed Program Alternatives

None of the Program alternatives would result in potentially significant impacts that could not be reduced to less than significant with the implementation of mitigation measures. There are no significant residual impacts after mitigation. Therefore, no significant unavoidable impacts could occur from any of the Program alternatives.

15.2 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 alternatives. For the Program alternatives, potential irreversible and irretrievable impacts are associated with the consumption of energy resources by equipment and vehicles including airplanes, and the potential for environmental accidents associated with the application equipment and vehicles/airplanes.

15.2.1 Energy Resources

Energy resources necessary for this Program would include gasoline and diesel fuel to power the vehicles and equipment proposed for use in the LBAM eradication activities. Alternatives MD-1, MD-2, and MD-3 would result in the most fuel consumption based on the number of vehicles, aircraft, and equipment required for the application every 30 to 60 days for 2 life cycles with trap monitoring for the third life cycle. Alternatives MMA, Btk, and S would be similar to the MD alternatives, requiring vehicles for ground treatment for 30 to 60 days again for 2 lifecycles; although no aerial spraying would be included. Alternative SIT would require aerial release of sterile moths every 7 to 14 days for 2 life cycles. Alternative Bio-P would require vehicles for 1 to 2 releases per LBAM generation with a maximum of 4 releases per year. Releases would be conducted when LBAM are most actively breeding, between February and November. The No Program Alternative would result in lower use of energy resources (than the Program Alternatives), involving the fuel currently used in vehicles to drive for current LBAM measures such as detection and inspection activities and application of registered chemical treatments.

15.2.2 Environmental Accidents

The following environmental accidents could occur as a result of the implementation of Program applications:

- Plane crash or fuel dump in anticipation of a 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 7, Public Services and Hazard Response, addresses plane crashes and fuel dump, and determines that none of the Program alternatives, including the No Program Alternative, would increase the risk of plane crashes or the frequency of fuel dumping. Chapter 7 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 determines that there would be no increased risk of fuel spill. Finally, Chapter 7 indicates that under each of the Program alternatives, the CDFA and its registered contractors would practice safe disposal of pesticide products and that 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.

Human health and ecological risk are discussed in Chapter 8 and Chapter 12, respectively, while air toxics from Program applications are discussed in Chapter 6. All discussions would pertain to any misdirected spray from backpacks and truck-mounted equipment. Mitigation Measure AQ-9 requires the use of precision

pesticide application technology to reduce spray drift and the total amount of pesticide applied, and lists various technologies available to achieve this.

15.3 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.” Chapter 3 discusses the effects of the No Program and Program alternatives on the regional and statewide economies.

The No Program Alternative would result in potentially significant statewide economic impacts for loss of agricultural land, loss of crops, reduced export, increased production costs, and reduced agricultural income associated with the spread of LBAM and control actions over the long term. None of the Program alternatives would result in adverse or beneficial economic effects, compared to existing conditions. 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.

15.4 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 applications. 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).

The CDFA would be encouraged to implement the following measures to maximize energy efficiency and reduce energy consumption during Program applications. With regard to employee commuting, the CDFA is encouraged to (1) provide storage and parking facilities for bicycles; (2) subsidize costs for workers to take public transportation or participate in ride sharing programs; and (3) offer preferential parking for electric, hybrid, or alternative low-carbon fuel vehicles.

With regard to vehicles associated with Program applications, the CDFA is encouraged to (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.

With regard to portable offroad sources, the CDFA is encouraged to utilize electrically- or manually-powered hydraulic spray backpacks rather than gas- or diesel-powered backpacks.

These energy conservation measures would have the benefit of reducing greenhouse gas emissions generated by the Program.

15.5 CONSISTENCY WITH LOCAL PLANS

California state law preempts local regulation and restriction of pesticide use. Local governing bodies may pass ordinances that regulate or restrict pesticide use in their own operations. For example, a city council may pass an ordinance that restricts pesticide use in municipal buildings and in public parks, and a school district

board can decree that certain pesticides cannot be used in schools (DPR 2001). However, these restrictions do not apply to state operations and would not be applicable to treatments proposed by the CDFA under the Program alternatives. Local ordinances have been described as appropriate to the discussion of the environmental setting in the resources and concerns sections of the PEIR, and none of the Program alternatives have been found to conflict with local plans.