

Public Services and Hazard Response

Chapter 7 evaluates potential impacts to public services and hazard response from LBAM Program implementation. Results of the evaluation are provided at the programmatic level. Section 7.1, Environmental Setting, presents an overview of the public services and hazard response in the Program Area, and contains state and local ordinances and regulations that are applicable to the Program. Section 7.2, Environmental Impacts and Mitigation Measures, presents the following:

- Environmental concerns and evaluation criteria: A determination of whether the Program alternatives would cause significant impacts to public services and hazard response
- Evaluation methods and assumptions
- Discussion of the impacts from the no Program and Program alternatives, and recommendations for mitigation, if required, for those impacts
- Cumulative impacts
- A summary of environmental impacts to public services and hazard response
- Monitoring of recommended mitigation measures

7.1 ENVIRONMENTAL SETTING

7.1.1 Overview of Public Services and Hazard Response

Law enforcement services in the Program Area are provided by a combination of county sheriffs' departments and municipal police departments. Sheriffs' departments typically provide law enforcement and jail services within their respective counties. In addition to law enforcement jurisdiction over unincorporated county areas, some sheriffs' departments, including the Stanislaus, San Joaquin, Alameda, and San Mateo county sheriffs' departments, also provide law enforcement services to certain cities within the county on a contract basis.

Additionally, the California Highway Patrol (CHP) is the state police force for California. The CHP has specific jurisdiction over all California state routes, U.S. highways, interstate highways, and freeways in the state, and over all public roads in unincorporated parts of a county.

Fire protection services in the Program Area are provided by a number of agencies, including county fire departments, city fire departments, and fire districts. A number of counties also have volunteer fire departments.

CAL FIRE oversees the fire protection and stewardship of over 31 million acres of California's privately owned wildlands. CAL FIRE's firefighters, fire engines, and aircraft respond to an average of more than 5,600 wildland fires each year. CAL FIRE also responds in other emergency situations such as medical aid, hazardous material spills, swiftwater rescues, search and rescue missions, civil disturbances, train wrecks,

floods, earthquakes, and more. CAL FIRE provides varied emergency services in 36 of California's 58 counties via contracts with local governments.

7.1.2 Regulatory Setting

California state law and local ordinances and regulations pertaining to public services and hazard response are cited in this section. No federal regulations pertain to public services or hazard response. Regulations governing human health are discussed in Chapter 8, Human Health Concerns.

7.1.2.1 State

California Code of Regulations

CCR Title 3 Division 6, Pesticides and Pest Control Operations, directs the safe use and transport of pesticides within the state. The following are some of the sections of particular relevance to the Proposed Program:

6670. CONTAINER CONTROL

Pesticides, emptied containers or parts thereof, or equipment that holds or has held a pesticide, shall not be stored, handled, emptied, disposed of, or left unattended in such a manner or at any place where they may present a hazard to persons, animals (including bees), food, feed, crops or property. The [Agricultural] commissioner may take possession of such unattended pesticides or emptied containers to abate such hazard.

6672. DELIVERY OF PESTICIDE CONTAINERS

- (a) *No person shall deliver a container that holds, or has held, a pesticide to a property unless he stores it in an enclosure or closure complying with the requirements of this Section or delivers it to a person in charge of the property or his agent, or a pest control operator or his employee. The person receiving the container shall control access to it in accordance with this Section.*
- (b) *Each person who controls the use of any property or premises is responsible for all containers or equipment on the property that hold, or have held, a pesticide. Unless all such containers are under his personal control so as to avoid contact by unauthorized persons, he shall:
 - (1) *Provide a person responsible to him to maintain such control over the containers at all times;*
or
 - (2) *Store all such containers in a locked enclosure, or in the case of liquid pesticides in a container larger than 55 gallons in capacity, the container shall have a locked closure. Either shall be adequate to prevent unauthorized persons from gaining access to any of the material.**

6682. TRANSPORTATION

- (a) *Pesticides shall not be transported in the same compartment with persons, food or feed.*
- (b) *Pesticide containers shall be secured to vehicles during transportation in a manner that will prevent spillage onto the vehicle or off the vehicle. Paper, cardboard, and similar containers shall be covered when necessary to protect them from moisture.*

California Department of Forestry and Fire Protection

Public Resources Code 4201-4204 directs CAL FIRE to map fire hazards within State Responsibility Areas based on relevant factors such as fuels, terrain, and weather. These statutes were passed after significant wildland-urban interface fires occurred; consequently, these hazards are described according to their potential for causing ignitions to buildings. These zones, referred to as Fire Hazard Severity Zones (FHSZs), provide the basis for application of various mitigation strategies to reduce risks to buildings associated with wildland fires (CAL FIRE 2007).

Additionally, the Public Resources Code, beginning with Section 4427, includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment with internal combustion engines; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on site for various types of work in fire-prone areas. These requirements would apply to Program activities within a “Very High Fire Hazard Severity Zone.”

7.1.2.2 Local

Local ordinances and regulations are generally contained within the general plans of cities and counties in the Program Area, and focus on providing adequate public services and hazard response with a reasonably brief response time throughout the service area. Municipal and county ordinances establish police and fire departments and districts, and some establish emergency preparedness councils or committees.

7.2 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The impacts evaluation for public services and hazard response is provided below. The evaluation analyzes the Program’s impacts relative to the impact significance criteria presented in Section 7.2.1, Evaluation Concerns and Criteria, below. Significant impacts are summarized for each alternative where one or more potential impacts were identified.

7.2.1 Evaluation Concerns and Criteria

The following concerns were associated with public services and hazard response and are addressed in this section:

- Discuss risk of airplane crash and fuel dumps during spraying.
- Address impacts on emergency services, including ability of 911 dispatchers to handle frequent calls related to treatment.
- Discuss the safe disposal of sticky traps, twist ties, and other chemical-related materials.

For this evaluation, Program impacts would be considered potentially significant if any of the Program alternatives would:

- Increase the demand for police, fire, or health-care services to the extent that it would result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire, police, or other emergency protection;

- 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; or
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The Program could result in the application of certain pesticide treatments within 0.25 mile of an existing or proposed school; the potential for hazardous effects of the Program alternatives on sensitive populations are discussed in Chapter 8, Human Health Concerns. Public services and hazard response to impacts at or near schools would be the same as described under the first criteria listed above.

Although activities proposed under the No Program and Program alternatives could occur on or near sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, none of these activities would involve excavation or other ground disturbance that could result in impacts related to the release of materials at these sites. Therefore, this criterion is not applicable to the Program and is not discussed further.

Some of the Program alternatives involve aerial application of chemical and nonchemical treatments and would, therefore, occur partially within areas covered by airport land use plans, within 2 miles of public airports or public use airports, or within the vicinity of private airstrips. However, no construction or other activities would occur that would conflict with airport land use plans or result in a safety hazard for people residing or working in proximity to these facilities. Therefore, this criterion is not applicable to the Program and is not discussed further.

None of the Program alternatives would result in any road or lane closures or detours. The Program would not involve activities that could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, this criterion is not applicable to the Program and is not discussed further.

Under each of the Program alternatives, the CDFA and its registered contractors would practice safe disposal of pesticide products. Properly rinsed empty containers can be safely and legally disposed of at landfills. 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. The Program would not exceed the existing capacity to safely dispose of these materials. Therefore, this criterion is not applicable to the Program and is not discussed further.

7.2.2 Evaluation Methods and Assumptions

The methodology and assumptions of this impact evaluation for LBAM eradication alternatives are provided below.

7.2.2.1 Methodology

The methodology used to prepare this public services and hazard response impact section is as follows:

- Reviewed transcripts from public scoping meetings on the PEIR in 2008.
- Summarized federal, state, county, and select municipal regulations, ordinances, and guidelines for general public services and hazard response issues and as they related to the Program.

- Evaluated potential hazards requiring response and potential interference with public services and hazard response at the programmatic level.
- Determined probable impacts and mitigation measures associated with the alternatives proposed in Chapter 2, Program Description.

7.2.2.2 Assumptions

For the analysis of potential impacts to public services and hazard response, no assumptions were made beyond those explained in Chapter 2, Program Description, for the No Program or Program alternatives. Under CEQA the term “impact” is used to mean an adverse or negative effect from a physical change in the environment compared to existing conditions.

7.2.3 No Program Alternative

The No Program Alternative would continue and expand quarantine and detection and inspection activities but without the application of the pheromone or any other insecticides, parasitic wasp releases, or sterile insect releases on an areawide basis by the CDFR or USDA.

The No Program Alternative would use hydraulic spraying, defined as a medium to coarse spray continuously applied by either truck-based equipment or backpack-based equipment, of the No Program insecticides by farm and nursery operators (and their registered pesticide applicators) and individual property owners. The target vegetation would be trees, shrubs, or crops on private land.

Increase Demand for Police, Fire, or Health-Care Services

Based on the results of the Human Health Risk Assessment (Appendix D), it is unlikely that the No Program and Program alternatives would result in a substantial increase in requests for services from emergency dispatchers, and the Program would not adversely affect the ability of 911 dispatchers to handle calls. It is not expected that citizens would gather to protest applications performed by farm and nursery operators.

Therefore, no impact would occur.

Create a Significant Hazard to the Public or Environment

The routine transport, use, or disposal of No Program insecticides would not create a significant hazard to the public or the environment. These insecticides are currently in use by farm and nursery operators and their registered pesticide applicators. Therefore, the potential for accident conditions would be low, and the No Program Alternative would not result in significant hazards to the public or environment. **Therefore, no impact would occur.**

Expose People or Structures to Wildfire Risk

Hydraulic spraying of No Program insecticides could be used in moderate to very high FHSZs. Because no large-scale, off-road equipment is required for this application method, the No Program Alternative is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. **Therefore, no impact would occur.**

7.2.4 Mating Disruption (Alternative MD)

7.2.4.1 Twist Ties (Alternative MD-1)

Plastic ties infused with LBAM pheromone (Isomate) are to be used in small isolated infestations (at least 5 miles from a regulated area or separated from a regulated area by a physical barrier, such as a largely uninhabited area or mountain range). Twist ties would be used as a stand-alone treatment or in conjunction with larval treatments of Btk or spinosad. No large-scale, off-road equipment is required for this application method.

Increase Demand for Police, Fire, or Health-Care Services

Based on the results of the Human Health Risk Assessment (Appendix D), it is unlikely that Alternative MD-1 would result in a substantial increase in requests for services from emergency dispatchers and the Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the application of the twist ties.

Impact PSH-1: Placement of twist ties for mating disruption would not increase demand for police, fire, or health-care services. Therefore, no impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

The routine transport, use, or disposal of infused twist ties would not create a significant hazard to the public or the environment. Applicators would adhere to all applicable CCR requirements regarding pesticide application to ensure safety; therefore, the potential for accident conditions would be low and Alternative MD-1 would not result in significant hazards to the public or environment.

Impact PSH-2: Placement of twist ties for mating disruption 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. No mitigation is required.

Expose People or Structures to Wildfire Risk

Twist ties could be used in moderate to very high FHSZs. Because no large-scale, off-road equipment is required for this application method, Alternative MD-1 is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-3: Placement of twist ties for mating disruption would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.4.2 Ground Application (Alternative MD-2)

The pheromone treatments (SPLAT and Hercon) may be applied to the ground most commonly for two scenarios, trees and shrubs, in residential yards and telephone poles and trees on public property alongside the

roadways. Several different methods exist of applying treatment compounds using ground-based equipment. The methods identified by the CDFA include:

- Caulk Gun (for trees and shrubs or telephone poles on private or public land)
- Pod Gun (for trees and shrubs on either public or private land)
- Backpack Dose Spray Gun (for public and private lands and target trees, shrubs, and structures like telephone poles)
- Truck Dose Spray Gun (used by personnel driving along public streets and stopping to apply the treatment compound to trees and poles that border the street)

Increase Demand for Police, Fire, or Health-Care Services

Based on the results of the Human Health Risk Assessment (Appendix D), it is unlikely that Alternative MD-2 would result in a substantial increase in requests for services from emergency dispatchers and the Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the ground application of the pheromone treatments.

Impact PSH-4: Ground application for mating disruption would not increase demand for police, fire, or health-care services. Therefore, no impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

The routine transport, use, or disposal of SPLAT and Hercon treatments would not create a significant hazard to the public or the environment. Applicators would adhere to all applicable CCR requirements regarding pesticide application to ensure safety; therefore, the potential for accident conditions would be low and Alternative MD-2 would not result in significant hazards to the public or environment.

Impact PSH-5: Ground application for mating disruption 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. No mitigation is required.

Expose People or Structures to Wildfire Risk

Ground application could be used in moderate to very high FHSZs. Because no large-scale, off-road equipment is required for these application methods and vehicles would remain on public or private roadways, Alternative MD-2 is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-6: Ground application for mating disruption would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.4.3 Aerial Application (Alternative MD-3)

Aerial applications of pheromone for mating disruption would be used to treat denser LBAM populations. The area for aerial applications is a 1.5-mile radius around each location where LBAM is detected in an undeveloped area. Flight operations for pheromone release would be during daytime hours (between 8:00 am and 6:00 pm) over essentially unpopulated areas at a height of 300 to 500 feet above ground level. The use of aerial release of pheromones is on hold while (1) the CDFA completes this PEIR, and (2) OEHHA and DPR, in consultation with DPH, finish a review of possible formulations in late 2009 or early 2010. After that time, aerial application of the pheromone in agricultural or undeveloped areas may be considered where ground applications of the pheromone are not feasible.

One of the public concerns was regarding potential hazards from fuel dumping, which is a procedure used to lighten an aircraft's weight in certain emergency situations. For instance, if a flight takes off at a maximum takeoff weight and then faces a situation where it must return to the departure airport (due to certain mechanical problems, or a passenger medical issue), not enough time is available to consume the fuel meant for getting to the original destination, and the aircraft may be over the maximum landing weight to land back at the departure point. Fuel would be released before landing. Once released, fuel would trail behind the aircraft. Most aviation fuel is a derivative of kerosene, which evaporates rapidly in the atmosphere and rarely survives in liquid form to reach the earth's surface.

Under Order 7110.65P, Chapter 9, Section 5, the Federal Aviation Administration sets requirements for fuel dumping. The Order stipulates that fuel cannot be dumped below 2,000 feet (to improve evaporation), and a dumping aircraft must be separated from other air traffic by at least 5 miles. Air traffic controllers must direct planes dumping fuel away from populated areas and over large bodies of water as much as possible. The same guidelines apply to military aircraft, and most air bases only permit fuel dumping in a specified area (Aerospaceweb.org 2009).

Increase Demand for Police, Fire, or Health-Care Services

Based on the results of the Human Health Risk Assessment (Appendix D), it is unlikely that Alternative MD-3 would result in a substantial increase in requests for services from emergency dispatchers and the Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the aerial application of the pheromone treatments.

Impact PSH-7: Aerial application for mating disruption would not increase demand for police, fire, or health-care services. Therefore, no impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

The routine transport, use, or disposal of pheromone would not create a significant hazard to the public or the environment. Applicators would adhere to all applicable requirements for safe aircraft operation, including fuel dumping, and CCR requirements regarding aerial pesticide application to ensure safety; therefore, the potential for accident conditions would be low, and Alternative MD-3 would not result in significant hazards to the public or environment.

Impact PSH-8: Aerial application for mating disruption would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and through the operation of aircraft. Therefore, no impact would occur. No mitigation is required.

Expose People or Structures to Wildfire Risk

Although aerial application could be used in moderate to very high FHSZs, flight operations would not pose increased wildfire risk in these zones. Aircraft commonly fly over very high FHSZs, and the Program would not substantially increase the risk of wildfire from accidents. Alternative MD-3 is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-9: Aerial application for mating disruption would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.5 Male Moth Attractant (Alternative MMA)

Alternative MMA involves ground treatment with the LBAM-specific pheromone plus permethrin to kill male moths. Alternative MMA is conducted in advance of the aerial mating disruption (if needed) to enhance the efficacy of the aerial mating disruption pheromone applications. The treatment area consists of a 1.5-mile radius around any detection site. Treatments may occur on street trees and utility poles, 8 feet aboveground. The method of application would be the same as that discussed for the ground application of SPLAT in Section 7.2.4.2, Ground Application (Alternative MD-2), including backpack and truck-mounted spraying.

7.2.5.1 Increase Demand for Police, Fire, or Health-Care Services

Based on the results of the Human Health Risk Assessment (Appendix D), it is unlikely that Alternative MMA would result in a substantial increase in requests for services from emergency dispatchers and the Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the ground application of the pheromone plus permethrin.

Impact PSH-10: Ground application of male moth attractant would not increase demand for police, fire, or health-care services. Therefore, no impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

The routine transport, use, or disposal of pheromone plus permethrin would not create a significant hazard to the public or the environment. Applicators would adhere to all applicable CCR requirements regarding pesticide application to ensure safety; therefore, the potential for accident conditions would be low and Alternative MMA would not result in significant hazards to the public or environment.

Impact PSH-11: Ground application of male moth attractant 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. No mitigation is required.

Expose People or Structures to Wildfire Risk

Ground application could be used in moderate to very high FHSZs. Because no large-scale, off-road equipment is required for these application methods and vehicles would remain on public or private roadways, Alternative MMA is not likely to increase wildfire hazards through the use of equipment that may

produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-12: Ground application of male moth attractant would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.6 Organically Approved Insecticides (Alternatives Btk and S)

Application methods for these alternatives would include hydraulic spraying, where a medium to coarse spray is continuously applied by either truck-based equipment or backpack-based equipment. The target vegetation would be trees or shrubs on private or public land.

Increase Demand for Police, Fire, or Health-Care Services

Based on the results of the Human Health Risk Assessment (Appendix D), it is unlikely that Alternatives Btk and S would result in a substantial increase in requests for services from emergency dispatchers, and the Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the ground application of organically approved insecticides.

Impact PSH-13: Ground application of organically approved insecticides would not increase demand for police, fire, or health-care services. Therefore, no impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

The routine transport, use, or disposal of Btk or spinosad would not create a significant hazard to the public or the environment. Applicators would adhere to all applicable CCR requirements regarding pesticide application to ensure safety; therefore, the potential for accident conditions would be low and Alternatives Btk and S would not result in significant hazards to the public or environment.

Impact PSH-14: Ground application of organically approved insecticides 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. No mitigation is required.

Expose People or Structures to Wildfire Risk

Ground application could be used in moderate to very high FHSZs. Because no large-scale, off-road equipment is required for these application methods and vehicles would remain on public or private roadways, Alternatives Btk and S are not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-15: Ground application of organically approved insecticides would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.7 Inundative Parasite Wasp Releases (Alternative Bio-P)

Inundative *Trichogramma* species (stingless parasite wasp) releases may be made in areas with more than 50 LBAM detections. This form of biological control would use native, commercially available parasitic wasps. The estimated number of the native wasp species (*Trichogramma platerni* and *T. pretiosum*) to be released is 1,000,000 per square mile (based on release rates used in commercial agriculture for the same insects). Wasp eggs are attached to index cards with Elmer's[®] glue and then attached to foliage where LBAM has been detected.

Increase Demand for Police, Fire, or Health-Care Services

Alternative Bio-P would not involve any chemicals and would not result in a substantial increase in requests for services from emergency dispatchers. The Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the wasp releases.

Impact PSH-16: Wasp releases would not increase demand for police, fire, or health-care services. Therefore, no impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

The wasps proposed for use are stingless and would not create a significant hazard to the public or the environment. Elmer's[®] glue is a nontoxic formula. Alternative Bio-P would not involve the transport or disposal of hazardous materials and would not have the potential for upset or accident conditions.

Impact PSH-17: Wasp releases 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. No mitigation is required.

Expose People or Structures to Wildfire Risk

Wasp releases could be used in moderate to very high FHSZs. Because no large-scale, off-road equipment is required for this alternative, Alternative Bio-P is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-18: Wasp releases would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.8 Sterile Insect Technique (Alternative SIT)

SIT would be the primary tool for LBAM eradication in California when it becomes fully operational. The Program would release sterile moths into the environment by air (using up to four aircraft) to disrupt mating and eradicate the population. The USDA has already accelerated the process of developing large-scale mass-rearing capabilities in support of LBAM eradication. The goal is to produce and release a minimum of 20 million sterile male moths per day at full capacity.

The equipment used for aerial application is a Beechcraft twin engine A90, flying at a minimum of 300 feet with an average projected altitude of about 2,000 feet during daylight hours. The actual altitudes will be set by the Federal Aviation Administration (FAA).

Concerns from the public exist regarding fuel dumping, which is discussed in Section 7.2.4.3, Aerial Application (Alternative MD-3).

Increase Demand for Police, Fire, or Health-Care Services

Alternative SIT would not involve any chemicals and would not result in a substantial increase in requests for services from emergency dispatchers and the Program would not adversely affect the ability of 911 dispatchers to handle calls. Local police, sheriffs' departments, and the CHP would be able to respond as necessary if citizens gather to protest the sterile insect releases.

Impact PSH-19: Alternative SIT would not increase demand for police, fire, or health-care services. Therefore, no adverse impact would occur. No mitigation is required.

Create a Significant Hazard to the Public or Environment

Sterile moths would not be harmful to humans and would not create a significant hazard to the public or the environment. Alternative SIT would not involve the transport or disposal of hazardous materials and would not have the potential for upset or accident conditions. Applicators would adhere to all applicable requirements for safe aircraft operation, including fuel dumping; therefore, the potential for accident conditions would be low and Alternative MD-3 would not result in significant hazards to the public or environment.

Impact PSH-20: Alternative SIT 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. No mitigation is required.

Expose People or Structures to Wildfire Risk

Aerial application could be used in moderate to very high FHSZs. Flight operations would not pose increased wildfire risk in these zones. Aircraft commonly fly over very high FHSZs, and the Program would not substantially increase the risk of wildfire from accidents. Alternative SIT is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Impact PSH-21: Aerial application for Alternative SIT would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no impact would occur. Therefore, mitigation is not required.

7.2.9 Cumulative Impacts

The LBAM Program would not increase demand for police, fire, or health-care services, nor would it create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, or through the operation of aircraft. In addition, the Program would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. In short, the Program does not have incremental impacts on public services, and implementation of any of the Program alternatives (individually or in combination) would not result in a significant contribution to any cumulative public services and hazard response impacts that could result from other projects in the vicinity of the treatment areas.

7.2.10 Environmental Impacts Summary

Table 7-1 is a summary comparison of all of the potential public services and hazard response impacts, including no impacts, associated with No Program and Program alternatives in comparison to existing conditions. The number of each statement correlates to its number in the text, and the significance determination symbols are provided at the end.

7.2.11 Mitigation and Monitoring

No impact would occur as a result of any of the Program alternatives, and mitigation is not required for public services and hazard response. Therefore, no monitoring of mitigation measures is needed.

**LIGHT BROWN APPLE MOTH ERADICATION PROGRAM
DRAFT PEIR**

Table 7-1 Summary Comparison of Impacts of Alternatives

Impact Statement	No Program	MD-1	MD-2	MD-3	MMA	Btk and S	Bio-P	SIT
Public Services and Hazard Response								
Increase Demand for Police, Fire, or Health-Care Services	N	N	N	N	N	N	N	N
Impact PSH-1: Placement of twist ties for mating disruption would not increase demand for police, fire, or health-care services.	na	N	na	na	na	na	na	na
Impact PSH-4: Ground application for mating disruption would not increase demand for police, fire, or health-care services.	na	na	N	na	na	na	na	na
Impact PSH-7: Aerial application for mating disruption would not increase demand for police, fire, or health-care services.	na	na	na	N	na	na	na	na
Impact PSH-10: Ground application of male moth attractant would not increase demand for police, fire, or health-care services.	na	na	na	na	N	na	na	na
Impact PSH-13: Ground application of organically approved insecticides would not increase demand for police, fire, or health-care services.	na	na	na	na	na	N	na	na
Impact PSH-16: Wasp releases would not increase demand for police, fire, or health-care services.	na	na	na	na	na	na	N	na
Impact PSH-19: Alternative SIT would not increase demand for police, fire, or health-care services.	na	na	na	na	na	na	na	N
Create a Significant Hazard to the Public or Environment	N	N	N	N	N	N	N	N
Impact PSH-2: Placement of twist ties for mating disruption 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.	na	N	na	na	na	na	na	na
Impact PSH-5: Ground application for mating disruption 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.	na	na	N	na	na	na	na	na
Impact PSH-8: Aerial application for mating disruption would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	na	na	na	N	na	na	na	na
Impact PSH-11: Ground application of male moth attractant 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.	na	na	na	na	N	na	na	na
Impact PSH-14: Ground application of organically approved insecticides 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.	na	na	na	na	na	N	na	na

Table 7-1 Summary Comparison of Impacts of Alternatives

Impact Statement	No Program	MD-1	MD-2	MD-3	MMA	Btk and S	Bio-P	SIT
Public Services and Hazard Response								
Impact PSH-17: Wasp releases 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.	na	na	na	na	na	na	N	na
Impact PSH-20: Alternative SIT 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.	na	na	na	na	na	na	na	N
Expose People or Structures to Wildfire Risk	N	N	N	N	N	N	N	N
Impact PSH-3: Placement of twist ties for mating disruption would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	N	na	na	na	na	na	na
Impact PSH-6: Ground application for mating disruption would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	na	N	na	na	na	na	na
Impact PSH-9: Aerial application for mating disruption would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	na	na	N	na	na	na	na
Impact PSH-12: Ground application of male moth attractant would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	na	na	na	N	na	na	na
Impact PSH-15: Ground application of organically approved insecticides would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	na	na	na	na	N	na	na
Impact PSH-18: Wasp releases would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	na	na	na	na	na	N	na
Impact PSH-21: Aerial application for Alternative SIT would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	na	na	na	na	na	na	na	N
Key: LS = Less-than-significant impact N = No impact na = Not applicable PS = Potentially significant impact (Applies to No Program only. Program alternatives have either feasible mitigations or unavoidable impacts.) SM = Potentially significant but mitigable impact SU = Potentially significant and unavoidable impact								

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