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Urban and Rural Land Uses

Chapter 4 evaluates potential impacts to both urban and rural land uses from LBAM implementation. Results of the evaluation are provided at the programmatic level. Section 4.1, Environmental Setting, presents an overview of land use types in the Program Area, and contains federal, state, and local ordinances and regulations that are applicable to the Program. Section 4.2, 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 affected land uses
- Evaluation methods and assumptions
- Discussion of the land use impacts from the No Program and Program alternatives, and recommendations for mitigation, if required, for those impacts
- Cumulative impacts
- A summary of environmental impacts due to land use conflicts
- Monitoring of recommended mitigation measures

4.1 ENVIRONMENTAL SETTING

4.1.1 Overview of Urban and Rural Land Use

Urban and rural lands within the Program Area (as described in Section 2.1, Program Area and Vicinity) include those areas that are not in agricultural use. Agricultural areas are described in Chapter 3, Agricultural/Horticultural Resources and Economics. Forested areas are described here and in Chapter 10, Terrestrial Resources. Urban and rural lands consist of a variety of different land uses and, in general, are developed either intensely or partially and populated.

4.1.2 Regulatory Setting

4.1.2.1 Federal

Table 4-1 provides the quantity of land in the Program Area, for counties with most of their land area below 5,000-foot elevation, that is managed or owned by the federal government as well as federal forest lands. Table 4-2 specifically identifies forest land because of the potential for LBAM to damage forest resources. Should LBAM infest any federal lands, a cooperative eradication effort would involve the USDA.

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

Table 4-1 Public Lands - LBAM Planning Area (2008)

County	Acres							LBAM Program Area
	BLM	USFS	USBR	NPS	USACE	USFWS	Total	
Alameda County	217	0	542	0	111	0	870	YES
Alpine County	12,962	408,085	0	0	0	0	421,047	NO*
Amador County	9,045	78,115	124	0	0	0	87,284	YES
Butte County	16,832	135,427	0	0	0	0	152,259	YES
Calaveras County	35,386	80,297	18,213	0	6,397	0	140,293	YES
Colusa County	33,410	64,547	6,558	0	0	0	104,515	YES
Contra Costa County	74	0	1,875	336	0	0	2,285	YES
Del Norte County	195	457,879	0	8,208	2	0	466,284	YES
El Dorado County	19,988	498,183	18,192	0	0	0	536,363	YES
Fresno County	157,048	986,766	21,419	354,828	4,101	0	1,524,162	YES
Glenn County	5,882	203,666	5,128	0	3,297	0	217,973	YES
Humboldt County	84,225	337,153	0	72,172	24	0	493,574	YES
Imperial County	1,267,370	0	2,518	0	0	1,255	1,271,143	YES
Inyo County	1,789,322	780,283	0	2,930,778	0	0	5,500,383	YES
Kern County	701,814	377,672	329	0	191	0	1,080,006	YES
Kings County	7,646	0	544	0	0	0	8,190	YES
Lake County	126,575	256,613	80	0	0	0	383,268	YES
Lassen County	1,009,062	618,854	0	20,804	0	0	1,648,720	NO
Los Angeles County	13,177	663,237	0	11,132	20,825	0	708,371	YES
Madera County	3,453	418,870	9,859	68,005	6,151	0	506,338	YES
Marin County	0	0	0	78,629	0	0	78,629	YES
Mariposa County	72,580	179,693	0	265,028	95	0	517,396	YES
Mendocino County	121,110	178,884	0	0	3,109	0	303,103	YES
Merced County	4,175	0	31,353	0	0	8	35,536	YES
Modoc County	272,581	1,381,604	37,604	2,828	0	39,143	1,733,760	NO
Mono County	559,913	1,199,110	0	0	0	0	1,759,023	NO
Monterey County	30,139	311,348	0	1,283	0	0	342,770	YES
Napa County	31,737	0	28,585	0	5	0	60,327	YES
Nevada County	18,989	178,510	2,782	0	1,533	0	201,814	YES
Orange County	1	58,938	0	0	560	0	59,499	YES
Placer County	20,329	339,012	20,672	0	1,919	0	381,932	YES
Plumas County	10,526	1,147,320	0	14,139	0	0	1,171,985	NO
Riverside County	1,552,334	290,103	18	495,407	3,660	0	2,341,522	YES
Sacramento County	4,497	0	4,447	0	674	0	9,618	YES
San Benito County	87,147	0	531	15,103	0	0	102,781	YES
San Bernardino County	6,207,404	466,240	19	1,668,604	6,187	10	8,348,464	YES
San Diego County	183,891	299,908	0	134	0	0	483,933	YES
San Francisco	0	0	0	2,273	0	91	2,364	YES

Table 4-1 Public Lands - LBAM Planning Area (2008)

County	Acres							LBAM Program Area
	BLM	USFS	USBR	NPS	USACE	USFWS	Total	
San Joaquin County	603	0	898	0	677	0	2,178	YES
San Luis Obispo County	240,895	191,547	491	0	4,636	0	437,569	YES
San Mateo County	0	0	0	2,353	0	0	2,353	YES
Santa Barbara County	7,462	629,086	10,191	69,816	0	0	716,555	YES
Santa Clara County	1,735	0	175	0	0	0	1,910	YES
Santa Cruz County	12	0	0	0	0	0	12	YES
Shasta County	129,850	742,916	3,456	108,022	0	0	984,244	YES
Sierra County	1,921	446,372	4,930	0	0	0	453,223	NO
Siskiyou County	84,923	2,388,959	42	43,732	0	39,316	2,556,972	NO
Solano County	2,157	0	2,109	0	2,720	0	6,986	YES
Sonoma County	7,158	0	0	0	14,277	0	21,435	YES
Stanislaus County	471	0	1,765	0	1,048	0	3,284	YES
Sutter County	2	0	0	0	0	0	2	YES
Tehama County	48,633	386,459	3,151	4,200	4,754	0	447,197	YES
Trinity County	78,419	1,462,752	273	0	0	0	1,541,444	YES
Tulare County	121,711	891,070	3,268	509,167	6,752	0	1,531,968	YES
Tuolumne County	44,892	611,200	8,260	427,347	144	0	1,091,843	YES
Ventura County	1,928	559,347	9,380	7,804	0	0	578,459	YES
Yolo County	29,692	0	391	0	1,180	0	31,263	YES
Yuba County	1,582	42,739	0	0	3,107	0	47,428	YES
Total - California	15,275,082	20,748,764	260,172	7,182,132	98,136	79,823	43,644,109	
Total - LBAM Counties	13,323,194	13,158,460	217,596	7,100,629	98,136	1,364	33,899,379	

Source: U.S. Department of Interior; Payments in Lieu of Taxes (PILT), County Payments and Acres (<http://www.doi.gov/pilt/index.html>)

Notes:

* Majority of acreage is above 5,000 feet in elevation.

BLM Bureau of Land Management
 NPS National Park Service
 USACE U.S. Army Corps of Engineers
 USBR U.S. Bureau of Reclamation
 USFS U.S. Forest Service
 USFWS U.S. Fish and Wildlife Service

Table 4-2 Forestland - LBAM Program Area (2002)

County	Acres	LBAM County
Alameda County	110,496	YES
Alpine County	404,749	NO
Amador County	249,993	YES
Butte County	540,127	YES
Calaveras County	482,810	YES
Colusa County	250,245	YES
Contra Costa County	39,113	YES
Del Norte County	514,409	YES
El Dorado County	919,337	YES
Fresno County	1,332,051	YES
Glenn County	268,675	YES
Humboldt County	1,809,427	YES
Imperial County	0	YES
Inyo County	523,936	NO
Kern County	1,056,450	YES
Kings County	0	YES
Lake County	689,769	YES
Lassen County	1,371,357	YES
Los Angeles County	853,320	YES
Madera County	700,837	YES
Marin County	112,294	YES
Mariposa County	785,868	YES
Mendocino County	1,799,133	YES
Merced County	54,138	YES
Modoc County	1,381,467	YES
Mono County	1,074,845	NO
Monterey County	1,070,608	YES
Napa County	291,416	YES
Nevada County	515,254	YES
Orange County	135,561	YES
Placer County	633,191	YES
Plumas County	1,507,312	YES
Riverside County	644,237	YES
Sacramento County	20,937	YES
San Benito County	385,919	YES
San Bernardino County	705,735	YES
San Diego County	1,237,514	YES
San Francisco	0	YES
San Joaquin County	26,037	YES

Table 4-2 Forestland - LBAM Program Area (2002)

County	Acres	LBAM County
San Luis Obispo County	756,952	YES
San Mateo County	155,042	YES
Santa Barbara County	818,567	YES
Santa Clara County	420,351	YES
Santa Cruz County	204,856	YES
Shasta County	2,014,768	YES
Sierra County	499,288	YES
Siskiyou County	3,287,763	YES
Solano County	44,161	YES
Sonoma County	523,255	YES
Stanislaus County	159,056	YES
Sutter County	16,591	YES
Tehama County	1,177,148	YES
Trinity County	1,958,975	YES
Tulare County	1,531,128	YES
Tuolumne County	1,177,056	YES
Ventura County	679,727	YES
Yolo County	126,541	YES
Yuba County	183,093	YES
Total - California	40,232,885	
Total - LBAM Counties	38,229,355	
<small>Source: K.M. Johnson. Demographic Trends in National Forest, Recreational, Retirement and Amenity Areas, Working Papers on Recreation, Amenities, Forests and Demographic Change. No. 2. 2002.</small>		

U.S. Forest Service (USFS)

The USFS manages 192 million acres of national forest and grasslands. In addition, the agency has the responsibility and authority to provide technical and financial assistance for all of the forest lands, including urban state, private, and tribal lands, and forested lands managed by other federal agencies (USFS 2004a). They also have an early detection and rapid response infrastructure in place and are proactive in developing broad networks with many partners, including APHIS, to detect, contain, and eradicate invasive species before they become established (USFS 2004a). The USFS would require an EA/EIS for any aerial spraying on their land. The USFS uses pesticides and herbicides to manage forest resources. Individual forests may address the control of invasive species and fuel management in their forest management plans.

Bureau of Land Management

The Federal Land Policy and Management Act of 1976 states that BLM has the statutory duty to prevent unnecessary degradation of public lands. BLM allows the use of insecticides, fungicides, and rodenticides. The products must be registered with the USEPA and used as prescribed on the label by personnel who are certified to supervise or apply the registered pesticides. To obtain authorization from BLM to conduct chemical pest control programs, on lands managed by them, the individuals, organization, or other federal

agencies must submit a Pesticide Use Proposal. Its approval is provided by authorized BLM officials. Upon completion of an application of a pesticide, a Pesticide Application Record must be completed within 24 hours. The Pesticide Application Record will be kept on file with the BLM for 10 years (BLM 2007).

The CDFA is claiming they can suspend the California State Constitution and the US Constitution.



California Food and Agricultural Code

California Food and Agricultural Code Section 11501.1 states that no ordinance or regulation of local government “may prohibit or in any way attempt to regulate any matter relating to the registration, sale, transportation, or use of pesticides, and any of these ordinances, laws or regulations are void and of no force or effect.” Therefore, local regulation of pesticide use is preempted by state regulation.

California Department of Forestry and Fire Protection

Public Resources Code Sections 4201-4204 direct CAL FIRE (2007) to map fire hazard 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. The zones also relate to the requirements for building codes designed to reduce the ignition potential to buildings in the wildland-urban interface zones, providing specific designation for application of defensible space and building standards consistent with known mechanisms of fire risk to people, property, and natural resources.

4.1.2.3 Local

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 (California Department of Pesticide Regulation 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.

Some municipalities within the immediate 13-county infested area or potential extended Program Area (to 57 counties) have adopted specific regulations regarding the use of pesticides. Several, such as the Town of Fairfax in Marin County and the City of Arcata in Humboldt County, have adopted ordinances prohibiting the use of pesticides by city departments. These examples are listed below. While these ordinances are not applicable to pesticide use by the State of California, as proposed under the Program alternatives, they are included to demonstrate local policy regarding pesticide use.

Town of Fairfax

Town of Fairfax (2009) Municipal Code Section 8.52.030 states that:

- (A) *The use of pesticides on Fairfax parks, open space parcels and public rights of way and buildings owned and maintained by the Town of Fairfax, is hereby prohibited.*
- (B) *The “use” shall be defined as both aerial and ground spraying and or dusting and all other ground applications.*

City of Arcata

City of Arcata (1997) Municipal Code Section 5492 states:

The City shall not use any pesticides on or in any City owned, operated or maintained property, building or facility except in accordance with the City's Pest Control Management Plan.

4.2 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The land use impacts evaluation is provided below. Program impacts on urban and rural land uses were evaluated based on the significance criteria presented in Section 4.2.1, Evaluation Concerns and Criteria. Significant impacts are summarized for each alternative where one or more potential impacts were identified.

4.2.1 Evaluation Concerns and Criteria

The following concerns are associated with urban and rural land uses and are addressed in this section:

- Discuss impacts on schools and other sensitive land uses (e.g., hospitals, nursing homes) from treatment.
- Address local community regulations regarding pesticides, e.g., prohibitions against use of pesticides in open-space areas such as golf courses, parks, etc.

The concern with impacts to schools and sensitive land uses is not due to any permanent land use changes caused directly by any of the Program alternatives. No new airports or operations centers would be needed involving any land use changes. Rather, the equipment proposed for use under some alternatives could produce noise impacts to schools and other sensitive land uses. This concern is addressed in Chapter 5, Noise.

For this evaluation, Program impacts to urban and rural land uses would be considered potentially significant if the Program would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Program adopted for the purpose of avoiding or mitigating an environmental effect. The potential to conflict with applicable plans, policies, or regulations within the proposed Program treatment areas is evaluated for each Program alternative. Because state law preempts local restrictions on the use of pesticides, local ordinances prohibiting their use are not applicable to the Program and are not discussed further.

The Program would have no impact related to physically dividing an established community; therefore, this criterion is not applicable to the Program.

The Program's potential to conflict with any applicable habitat conservation plan or natural community conservation plan is discussed in Chapter 10, Terrestrial Resources.

4.2.2 Evaluation Methods and Assumptions

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

4.2.2.1 Methodology

The methodology used to prepare this programmatic urban and rural land use impact section is as follows:

- Reviewed transcripts from public scoping meetings on the PEIR in 2008.
- Reviewed federal, state, county and select municipal land use regulations, ordinances, and guidelines for general land use issues and as they relate to the Program alternatives.
- Determined probable land use impacts and mitigation measures associated with the alternatives proposed in PEIR Chapter 2, Program Description.

4.2.2.2 Assumptions

For the analysis of potential impacts to urban and rural land use, no assumptions were made beyond those identified in Chapter 2, Program Description, for the No Program or Program alternatives. The term “impact” under CEQA means an adverse or negative effect from a change in the environment over existing conditions.

4.2.3 No Program

The No Program Alternative would involve measures to reduce LBAM populations as described in Chapter 2, Program Description, but without the use of insecticides or any other pesticides on an areawide basis by USDA or CDFA.

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Where is the data to support your assumption the homeowners and farmers would do what you are stating here?

theLBAM is a leaf roller, not a pine needle roller!!!

Actually the LBAM is not growing at a rate the the CDFA anticipated. Still there is no crop damage.

4.2.3.1 Conflict with Applicable Regulations

Although the No Program Alternative would involve measures to reduce LBAM populations as described in Chapter 2, Program Description, **LBAM would continue to spread.** Potential damage to forest trees and/or understory trees and plants caused by LBAM could lead to an increase in fuel for potential wildfires. This spread is of particular concern in areas of significant wildfire risk and in wildland-urban interface zones. Severe and sustained damage leading to substantial fuel increases could result in changes in State Responsibility Areas and FHSZs when CAL FIRE periodically remaps these zones. An expansion of FHSZs would result in increased restrictions on building in areas of increased wildland fire risk. **Impacts would be potentially significant.**

4.2.4 Mating Disruption (Alternative MD)

The LBAM pheromone would be used to disrupt the moth’s mating activities. The three mating disruption methodologies under consideration include twist ties, ground application of pheromones, and aerial application of pheromones.

4.2.4.1 Twist Ties (Alternative MD-1)

Plastic ties infused with LBAM pheromone are to be used in small isolated infestations (at least 5 mi a regulated area or separated from a regulated area by a physical barrier, such as a largely uninhabited

Their program chemicals are combustible! And home owners and farmers will not be spraying forest areas like the CDFA plans on doing with combustible pesticides!!!

mountain range). Twist ties would be used as a stand-alone treatment or in conjunction with larval treatments of Btk or spinosad. No mechanical equipment is required for this application method.

Conflict with Applicable Regulations

Twist ties could be used in moderate to very high FHSZs. Because no mechanical 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. Therefore, no impact would occur.

Impact LU-1: Placement of twist ties for mating disruption would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.4.2 Ground Application (Alternative MD-2)

The pheromone treatments may be applied to the ground most commonly for two scenarios: (1) trees and shrubs in residential yards and (2) telephone poles and trees on public property alongside the roadways. Several different methods of applying treatment compounds using ground-based equipment are in use. The methods identified by 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 (for use by personnel driving along public streets and stopping to apply the treatment compound to trees and poles that border the street)



Conflict with Applicable Regulations

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 roadways, Alternative MD-2 is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire. Therefore, no impact would occur.

Impact LU-2: Ground application for mating disruption would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.4.3 Aerial Application (Alternative MD-3)

Aerial application 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. Aerial application of the pheromone in agricultural or undeveloped areas may be considered where ground applications of the pheromone are not feasible.

Since they could not spray all of us humans because they aerially sprayed us at night in 2009 they will now aerially spray us during the day.

Conflict with Applicable Regulations

Although aerial application could be used in moderate to very high FHSZs, flight operations would be conducted at 300 to 500 feet above ground level and not produce sparks or flames. Emergency fuel dumping is discussed in Section 7.2.4.3. Consequently, Alternative MD-3 would not pose increased wildfire risk in these zones. Therefore, no impact would occur.

Impact LU-3: Aerial application for mating disruption would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.5 Male Moth Attractant (Alternative MMA)

This alternative 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 would occur on street trees and utility poles, 8 feet aboveground. The method of application would be with a backpack dose spray gun as discussed for ground application in Section 4.2.4.2, Ground Application (Alternative MD-2), including backpack and truck-mounted spraying.

Conflict with Applicable Regulations

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 roadways, Alternative MMA is not likely to increase wildfire hazards through the use of equipment that may produce a spark, flame, or fire. Therefore, no impact would occur.

Impact LU-4: Ground application of male moth attractant would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.6 Organically Approved Insecticides (Alternatives Btk and S)

Application methods for this alternative 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.

Conflict with Applicable Regulations

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 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. Therefore, no impact would occur.

Impact LU-5: Ground application of organically approved insecticides would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.7 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.

Conflict with Applicable Regulations

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. Therefore, no impact would occur.

Impact LU-6: Wasp releases would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.8 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 to disrupt mating and eradicate the population. 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 above ground level during daylight hours. The actual altitudes will be set by the FAA.



You will be aeri-ly sprayed with bugs!

Conflict with Applicable Regulations

Aerial application could be used in moderate to very high FHSZs. Flight operations would not pose increased wildfire risk in these zones. Therefore, no impact would occur.

Impact LU-7: Aerial application for Alternative SIT would not conflict with applicable land use regulations, and no impact would occur. Therefore, mitigation is not required.

4.2.9 Cumulative Impacts

No potentially significant or even less-than-significant impacts to urban and rural land uses would occur as a result of any of the Program alternatives. Therefore, no cumulative impacts would occur. The Program would not create any barriers that would divide established communities, and the evaluation of compatibility of the Program with applicable land management regulations resulted in no impacts. The Program's effects would not result in a significant contribution to cumulative land use impacts associated with forest land management for wildfire prevention.

The Program would not result in permanent or temporary changes to land uses. Of statewide concern is the conversion of agricultural land to urban uses, and this issue is addressed in Section 3.2.9, Cumulative Impacts.

The Program would not contribute to land conversion from agricultural to urban uses or to loss of forestry resources.

4.2.10 Environmental Impacts Summary

Table 4-3 is a summary comparison of all of the potential urban and rural land use 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. The significance determination symbols are explained at the end.

4.2.11 Mitigation and Monitoring

No potentially significant impacts for urban and rural land use would occur as a result of any of the Program alternatives, and mitigation is not required.

Table 4-3 Summary Comparison of Impacts of Alternatives

Impact Statement	No Program	MD-1	MD-2	MD-3	MMA	Btk and S	Bio-P	SIT
Urban and Rural Land Uses								
Conflict With Applicable Regulations	PS	N	N	N	N	N	N	N
Impact LU-1: Placement of twist ties for mating disruption would not conflict with applicable land use regulations.	na	N	na	na	na	na	na	na
Impact LU-2: Ground application for mating disruption would not conflict with applicable land use regulations.	na	na	N	na	na	na	na	na
Impact LU-3: Aerial application for mating disruption would not conflict with applicable land use regulations.	na	na	na	N	na	na	na	na
Impact LU-4: Ground application of male moth attractant would not conflict with applicable land use regulations.	na	na	na	na	N	na	na	na
Impact LU-5: Ground application of organically approved insecticides would not conflict with applicable land use regulations.	na	na	na	na	na	N	na	na
Impact LU-6: Wasp releases would not conflict with applicable land use regulations.	na	na	na	na	na	na	N	na
Impact LU-7: Aerial application for Alternative SIT would not conflict with applicable land use regulations.	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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