

**California Department of Food and Agriculture
Statewide Plant Pest Prevention and Management Program
PEIR Addendum 6**

Prepared for:

California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

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1. Introduction

This document is Addendum No. 6 (Addendum) to the Statewide Plant Pest Prevention and Management Program Environmental Impact Report (PEIR) prepared by the California Department of Food and Agriculture (CDFA). The PEIR is intended to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of implementation of the Statewide Plant Pest Prevention and Management Program (Statewide Program). The PEIR was prepared in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and the State CEQA Guidelines (Cal. Code Regs., tit. 14 § 15000 et. seq.) (CEQA Guidelines). The PEIR was certified on December 24th, 2014 by CDFA Secretary Karen Ross. CDFA was the Lead Agency. A Notice of Determination was filed with the Office of Planning and Research.

CDFA is proposing changes to the PEIR and Statewide Program to include turf/groundcover applications of granular Acelypryn G (Chlorantraniliprole) and spray drench of liquid beetleGONE! Tlc (active ingredient: Bacteria thuringiensis, an organic bacterial product product, Bt), individually or in combination, in urban/residential settings as alternatives to the Japanese Beetle Program treatments previously analyzed in the PEIR. Under CEQA, an addendum may be prepared when minor modifications are proposed for a project that has already been approved and when no additional significant environmental impacts would result. (CEQA Guidelines, §§, 15162, 15163, 15164.) Addendum No. 6 evaluates whether any new significant impacts or a substantial increase in the severity of previously identified significant impacts would result from implementation of the proposed modification.

2. Purpose of Addendum

The purpose of this addendum is to include the additional turf/groundcover application scenarios in the PEIR as part of the Japanese Beetle Program. Under CEQA, the lead agency or a responsible agency shall prepare an addendum to a previously-certified EIR if some changes or additions are necessary to the prior EIR, but none of the conditions calling for preparation of a subsequent or supplemental EIR have occurred. (CEQA Guidelines, § 15164.) Once an EIR has been certified, several approaches can be used to achieve CEQA compliance for specific activities. A subsequent EIR is only required when the lead agency or responsible agency determines that one of the following conditions has been met:

(1) Substantial changes are proposed in the project, or substantial changes occur with respect to the circumstances under which the project is undertaken, which require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (CEQA Guidelines, §15162 (a)(1),(2));

(2) New Information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

- a. The Project will have one or more significant effects not discussed in the previous EIR;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternatives (CEQA Guidelines, §15162(a)(3)).

A CEQA Addendum is the appropriate CEQA compliance document when changes or additions are necessary to an EIR, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. (CEQA Guidelines, § 15164(a).) The CEQA Guidelines recommend that a brief explanation of the decision to prepare an addendum rather than a subsequent or supplemental EIR be included in the record. (CEQA Guidelines, §15164(e).)

This Addendum has been prepared because the proposed modifications to the PEIR do not meet the conditions for a subsequent or supplemental EIR. This Addendum explains why the proposed modifications would not result in new significant environmental effects or result in a substantial increase in the severity of previously-identified significant effects. There is no new information demonstrating that the proposed modifications would have new effects or substantially increase the severity of previously identified significant effects on the environment or that modifications would change the conclusions of the previously certified PEIR. An addendum does not need to be circulated for public review, but rather can be attached to the final EIR. (CEQA Guidelines, §15164(c)

3. Statewide Program Environmental Impact Report Overview

CDFA is mandated to prevent the introduction and spread of injurious insect or animal pests, plant diseases and noxious weeds in California. (Cal. Food & Ag. Code § 403.) To accomplish this, CDFA implements the Statewide Program, an ongoing effort to protect California's agriculture and the environment from the damage caused by invasive plant pests.

The Statewide Program encompasses a range of phytosanitary measures (such as compliance protocols, conditions, inspections, and/or certifications) whose purpose is preventing the introduction and spread of quarantine pests or limiting the economic impact of regulated non-quarantine pests. The activities include prevention, exclusion, management, and control carried out or overseen by CDFA against specific injurious pests and their vectors, throughout California.

Program activities may occur anywhere that a pest may be found in agricultural, nursery, or residential settings. They may also occur at California Border Protection Stations and sometimes outside of California in response to restrictions on importation of potentially infested commodities and equipment. The location, area and extent of specific activities under the Statewide Program are ultimately evaluated based on the site-specific situation and dictated by the target pest, as well as by the regulatory requirements and management approaches available for response.

Activities that would be conducted under the Statewide Program include pest risk analysis (evaluation of the pest's environmental, agricultural, and biological significance), identification, detection and delimitation of new pest populations, and pest management required responses that may include rapid eradication, suppression or containment including prevention of the movement of plant pests into and within California.

The Statewide Program is administered by CDFA's Plant Health and Pest Prevention Division, Citrus Program, and Pierce's Disease Control Program. The Division is divided into four branches. All phytosanitary measures related to pest management activities are carried out or overseen by one of the branches under the oversight of the Division Director. The four branches are:

- **Plant Pest Diagnostics Branch**, provides scientific information on pests and making all official identifications and diagnoses for suspect pests and diseases;
- **Pest Detection/Emergency Projects Branch**, initiates and operates programs which carry out phytosanitary procedures of control including suppression, containment or eradication and treatments of priority pests to prevent establishment;
- **Pest Exclusion**, initiates prevention and exclusion to keep priority pests out of the state of California and to prevent or limit the spread of newly discovered pests in the role of quarantine regulatory compliance and service to the agricultural industry and the public; and
- **Integrated Pest Control Branch**, conducts a wide range of pest management and eradication programs in cooperation with growers, county agricultural commissioners and federal and state agencies and non-governmental organizations.

4. Proposed Modification to Statewide Program Scenario

As identified in the PEIR, to prevent the entrance of Japanese Beetle (JB) in California, CDFA currently enforces the Japanese Beetle Exterior Quarantine, Title 3 of the California Code of Regulations Section 3280, restricting movement of host commodities and possible carriers. CDFA also enforces the Japanese Beetle Federal Domestic Quarantine, Title 7 of the Code of Federal Regulations, Section 301.48. CDFA has an active eradication program in place for any incipient populations of JB per the requirements of the U.S. Domestic Japanese Beetle Harmonization Plan.

CDFA conducts statewide detection trapping to intercept JB, and a single beetle find in a trap may trigger a delimitation survey to further identify the significance of the find. If further detection and trapping indicates that JB may be present in numbers or life stages above a specific threshold, and eradication is determined to be feasible, an eradication project may be initiated. The PEIR's JB Program description and analysis included foliar and soil applications using Merit® 2F Insecticide with respect to JB urban/residential treatments. Currently, the PEIR describes the PD/EP-E-04 scenario using Merit® 2F Insecticide that can be applied as a soil drench using a backpack sprayer or mechanically pressurized system.

Based on the biological life stages of JB and recommendations by the CDFA's JB Science Advisory Panel (JBSAP), CDFA is proposing to add alternative application use scenarios to the JB treatment scenarios that were previously analyzed in the PEIR. The additional scenarios consist of turf/groundcover applications using granular Acelepryn G (Chlorantraniliprole) and spray drench of BeetleGONE! Tlc (Bt), individually or in combination, in urban/residential settings. The JB is a destructive plant pest, both grubs (larvae) and adults. Adults feed on the foliage and fruits of several hundred species of fruit trees, ornamental trees, shrubs, vines and field and vegetable crops. Adults leave behind skeletonized leaves and large irregular holes in leaves. The grubs develop in the soil, feeding on the roots of various plants and grasses and often destroying turf in lawns, parks, golf courses, and pastures. Today, the Japanese Beetle is the most widespread turf-grass pest in the United States. Efforts to control the larval and adult stages are estimated to cost more than \$460 million a year. Losses attributable to the larval stage alone have been estimated at \$234 million per year - \$78 million for control costs and additional \$156 million for replacement of damaged turf. This includes losses to non-nursery crop production, but as JB spreads in corn and soybean growing regions of the Midwest, losses involving row crop production are expected to increase.

The \$78 million for control costs represents increased pesticide use in areas east of the Rocky Mountains where JB is established and there is no attempt to eradicate it, as it is not feasible. These are the pest control management costs that come with having to "live with" the JB. The management of JB and its associated costs and impacts are expected to continue in perpetuity where the pest is fully established. Because of the severe impacts JB has on the urban/residential environment affecting homeowners, it is critical to be able to address all life stages of the JB.

Application of Acelepryn G is slightly different from application of the liquid form, as it is applied via spreaders and then watered in rather than applied by a sprayer. Application of BeetleGONE! Tlc is applied in a manner similar to the foliar and soil applications already analyzed in the PEIR because it requires use of the same backpack sprayer, boom sprayer, or mechanically pressurized sprayer. The application of BeetleGONE! Tlc would occur in urban/residential settings with drench applications made to turf (lawns/golf courses) and ornamental ground cover (including flowers and containerized plants), recreational areas, and commercial settings using a mechanically pressurized sprayer or backpack sprayer. Additionally, larger areas such as school athletic fields or cemeteries could receive applications made with a small low-pressure boom sprayer, although in general the use of BeetleGONE! Tlc will be restricted to a small portion of the treatment area that is not appropriate for use of Acelepryn®.

CDFA will follow existing management practices (MPs) and mitigation measures for activities conducted under the PEIR including general MPs such as conducting a site assessment, following appropriate treatment procedures, training personnel in proper use of pesticides, and enforcing runoff and drift prevention. (See Statewide PEIR, Volume 1_Main Body, Section 2.11 Program Management Practices.)

The addition of the alternative JB treatments with granular Acelepryn G (Chlorantraniliprole) and BeetleGONE! Tlc will be added as PDEP-EP-E-11, PDEP-EP-E-12, and PDEP-EP-E-11-12, which are scenarios of treatments to turf and/or groundcover in urban/residential settings... The Human Health (HHRA) and Ecological Risk Assessments' (ERA) (Appendix 6A) analyzes PDEP-EP-E-11, PDEP-EP-E-12, and PDEP-EP-E-11-12 and provides substantial evidence that the proposed modification would not have any new significant impacts nor substantially increase the severity of the significant impacts identified in the PEIR and would not change the PEIR's conclusions. (See Appendix 6A, Executive Summary HHRA and ERA, Problem Statement HHRA and ERA and Conclusions.)

5. Analysis of Potential Environmental Impacts Associated with the Proposed Modifications

Appendix 6A includes an HHRA and an ERA. The ERA and HHRA were conducted to determine if the alternative JB treatments with granular Acelepryn G (Chlorantraniliprole) and BeetleGONE! Tlc scenarios would result in any additional or more severe environmental impacts other than those addressed in the PEIR. The scenarios were analyzed as spreader dispersion followed by watering in of granular Acelypryn G for the eradication of JB and a turf/groundcover drench application of beetleGONE! TLC using a sprayer with low pressure.. The methods used in the ERA and HHRA largely follow those methods used in the previous risk assessments in the PEIR. Where methods differ, the new assumptions or receptors are discussed.

The ERA (Appendix 6A) along with the PEIR was used to assist CDFA in assessing the potential to affect particular species and develop site-specific measures to protect these species. This ERA did not identify new significant effects beyond those identified in the PEIR, or any substantial increase in the severity of impacts described in the PEIR. No alterations or mitigation measures to PD/EP-E-12 scenario that were not already indicated for other scenarios in the PEIR are recommended for the protection of biological resources. (See Appendix 6A ERA.)

The HHRA (Appendix 6A) along with the PEIR was used to assist CDFA in assessing potential impacts to human health. The HHRA did not identify any new significant human health impacts or any substantial increase in the severity of the significant effects identified in the PEIR. No alterations to PD/EP-E-11 or PD/EP-E-11-12 that were not already indicated for other scenarios in the PEIR are recommended. (See Appendix 6A HHRA).

CDFA staff considered the findings and conclusions of the ERA and HHRA in the context of CEQA Appendix G environmental factors that may be potentially affected by the three application scenarios (PD/EP-E-11, PD/EP-E-12, and PD/EP-E-11-12) that comprise this Addendum. These findings are discussed below in further detail.

Aesthetics were considered in the PEIR, and the Proposed Program would be consistent with typical agricultural or urban pest management practices. As with the Statewide Program, any visual changes resulting from the Proposed Program would be short term and temporary for sensitive viewer groups. Therefore, for locations where the three additional scenarios may occur, the Proposed Program would have no new significant impacts on aesthetics, nor substantially increase the severity of significant impacts identified in the PEIR.

Agricultural resources were analyzed in the PEIR. As with the Statewide Program, the additional three scenarios in the Proposed Program would have beneficial impacts to agricultural resources due to the reduction or elimination of pests that are injurious to agricultural resources. Therefore, for locations where the addition of the three scenarios may occur, the Proposed Program would have no new significant impacts on agriculture resources, nor substantially increase the severity of significant impacts identified in the PEIR.

The PEIR analyzed potential effects of air quality by conducting an emissions inventory of Statewide Program activities for each basin in the state. The PEIR also noted that while air pollutants could possibly increase over time in a particular air basin to a level that would be significant, no additional feasible measures exist beyond those outlined by CDFA to further reduce criteria air pollutant emissions below the threshold (Volume 1; Main Body of the Statewide PEIR). CDFA currently implements all feasible measures to minimize criteria air pollutant emissions. The health risk associated with the exposure to toxic air from the activities carried out under the Statewide Program was not determined to be significant, and because of the short-term nature of the activities, such exposure would not be substantial (Volume 1; Main Body of the Statewide PEIR, Appendix 5A, HHRA). The Proposed Program utilizes the same methods and equipment as scenarios previously evaluated in the PEIR (Volume 3; Appendix B of the Statewide PEIR). Granular products, such as the Acelepryn analyzed here, have lower risk of over-spray than liquid ones and Bt products do not affect air quality *per se*. Therefore, the three new scenarios would have no new significant impacts on air quality, nor substantially increase the severity of significant impacts identified in the PEIR.

The evaluation of biological resources in the PEIR considered the potential for Statewide Program activities to result in substantial adverse effects on special-status species and sensitive natural communities. Physical and biological management activities were evaluated qualitatively and determined to have either no impact or a less than significant impact on biological resources. For chemical management activities, the analysis incorporated the results of the ERA completed with the PEIR (See Volume 2; Appendix A of the Statewide PEIR), which considered a variety of chemicals and their effects on special-status species. The ERA for the PEIR used surrogate species that were selected to represent the range of special-status species that may be found in proximity to the sites where chemical management activities could occur. A number of scenarios were found to have no potential to exceed a level of concern for any or a subset of surrogate species, and therefore such impacts would be less than significant. Where the modeling suggested risk to special-status species, CDFA evaluates potential site-specific effects before the management activity, then identifies and implements appropriate mitigation measures. As part of this process, CDFA obtains technical assistance from the California Department of Fish & Wildlife, United States Fish & Wildlife Service, and National Marine Fisheries Service regarding the mitigation measures.

Proposed Program activities would utilize management practices, mitigation measures, protocols, and equipment as the scenarios previously evaluated (Volume 2; Appendix A, and Volume 3; Appendix B of the Statewide PEIR). However, the Proposed Program could utilize a

new active agent (*Bacteria thuringiensis*) and different application methods as an alternative to the scenarios previously evaluated. The Proposed Program ERA (Appendix 6A) indicated that the three new scenarios would have no new significant impacts on biological resources, nor substantially increase the severity of significant impacts identified in the PEIR.

Cultural resources were considered in the PEIR, and no information was found to suggest that there has been, or could be in the future, loss or degradation of significant historic resources as a result of the Statewide Program. As in the Statewide Program, the Proposed Program would not include any activities which could physically modify historic structures or excavate into native soils potentially containing archeological resources, paleontological resources, or human remains. Therefore, the three new scenarios in the Proposed Program would have no new significant impacts on cultural resources, nor substantially increase the severity of significant impacts identified in the PEIR.

Geology and soils were considered in the PEIR as part of the Statewide Program. The Proposed Program would not include construction of structures that could be subject to earthquake-related hazards, unstable soils, expansive soils, or other geotechnical hazards, and it would not entail construction of septic or other wastewater disposal systems. The extent to which the Proposed Program could disturb soils would be limited to host plant removal, and such activities would be consistent with current agricultural crop practices under existing conditions (e.g. tilling of soil, crop rotation). Thus, the Proposed Program would not expose individuals to increased geologic or seismic hazards, would not result in erosion or loss of topsoil, would not construct structures on unstable soil, and would not create wastewater systems in unsuitable soils. Therefore, the three new scenarios in the Proposed Program would have no new significant impacts on geology and soils, nor substantially increase the severity of significant impacts identified in the PEIR.

Global climate change was considered in the PEIR and included quantifying greenhouse gas emissions from Statewide Program activities. Over the past twenty years, statewide PDCP activities that contribute to global climate change have remained the same or decreased, depending on location and scenario. The Proposed Program will not lead to new or increased activities; rather the new scenarios will replace existing scenarios that are essentially identical in regard to the protocols that might affect global climate change. The analysis in the PEIR concluded that emissions would decrease due to several factors, including federal and state regulations targeted at reducing emissions. However, the PEIR also explained that if the level of activity increases in the Statewide or Proposed Program, emissions could possibly increase to a level that would be significant and unavoidable. As discussed in the PEIR, if the level of activity increases under the Statewide Program or Proposed Program, no feasible mitigation measures would reduce the impact to a less-than-significant level. Therefore, the three new scenarios in the Proposed Program would have no new significant impacts on global climate change, nor substantially increase the severity of significant impacts identified in the PEIR.

Hazards and hazardous materials were considered and addressed in the PEIR, including hazards associated with use of equipment and related hazardous materials (e.g., fuels), the risk to human health associated with pesticide applications, the potential to encounter site contamination during pest management activities, the impacts of activities conducted at or near schools and airports, and the potential for pest management activities to generate wildfires. The Health Risk Assessment

PEIR determined that Statewide Program impacts would be less than significant through following regulatory requirements, management practices for transport, storage, and use of hazardous substances, and implementation of mitigation measures (Volume 1; Main Body of the Statewide PEIR).

In the PEIR HHRA (Volume 3; Appendix B), various groups with the potential to be exposed to a number of different pesticide application scenarios were evaluated. The PEIR HHRA concluded that the Statewide Program's impacts due to hazards and hazardous materials could be potentially significant. However, the PEIR included mitigation measures that would reduce hazards and hazardous materials impacts to less than significant. These mitigation measures are also applicable to the Proposed Program. The Proposed Program HHRA did not identify any new significant human health impacts or any substantial increase in the severity of the significant impacts as a result of the Proposed Program activities. Therefore, the three new scenarios in the Proposed Program would have no new significant impacts on hazards and hazardous materials, nor substantially increase the severity of significant impacts identified in the PEIR, which determined that impacts would be less than significant with mitigation.

Hydrology was considered in the PEIR. As in the Statewide Program, the Proposed Program would not require the use of ground or surface water and would not result in the obstruction or diversion of any waterbody. It would not require the construction of structures that could be subject to flooding or other hydrologic hazards either. Therefore, the three new scenarios in the Proposed Program would have no new significant impacts on hydrology, nor substantially increase the severity of significant impacts identified in the PEIR.

Water quality was also considered in the PEIR. This water quality analysis considered the extent that Statewide Program activities could result in violations of water quality standards, impairment of beneficial uses, or water quality conditions that could be harmful to aquatic life or human health. It also considered applicable permits and relevant management practices designed to reduce the potential for drift, runoff, or erosion. As in the Statewide Program, chemical management activities in the Proposed Program are subject to a number of regulatory requirements, and the chemicals would have fate and transport properties that would make them unlikely to be found in water at concentrations that could exceed relevant standards or impair beneficial uses. While identifying that potential significant impacts would be possible in cases where parties affected by any quarantine implement certain activities in response to quarantines, in these cases, protective mitigation measures would be implemented by CDFA. Though the Proposed Program activities would utilize a new active ingredient and means of application, they would utilize the same management methods, protocols, equipment and treatment frequency as the scenarios previously evaluated (Volume 2; Appendix A and Volume 3; Appendix B of the Statewide PEIR). In fact there would be a lower risk of over-spray near water. Therefore, the three new scenarios would have no new significant impacts on water quality, nor substantially increase the severity of significant impacts identified in the PEIR.

Land use and planning was considered in the PEIR. As in the Statewide Program, the Proposed Program would not result in the creation of any structures or barriers that could divide an established community, nor result in any permanent land use changes or regulations.

All activities conducted under the Proposed Program would be required to obtain the same necessary authorizations as those required from the implementation of previously analyzed scenarios from the relevant land use authority or property owners and comply with applicable laws or policies of the area. Any results are identical as those resulting from previously analyzed scenarios. Therefore, the three new scenarios would have no new significant impacts on land use and planning, nor substantially increase the severity of significant impacts identified in the PEIR.

Mineral resources were considered in the PEIR. The PEIR concluded that none of the activities analyzed would have the potential to affect mineral production sites. Because the three scenarios comprising the Proposed Program would use methods previously evaluated, the Proposed Program would have no new significant impacts on mineral resources, nor substantially increase the severity of significant impacts identified in the PEIR.

Noise was considered in the PEIR. For the noise analysis, typical noise-generating equipment that may be used for the various types of pest management activities were identified, and noise generation estimates were developed for each activity. The analysis then identified the distance from sensitive receptors at which noise thresholds would be exceeded. The analysis concluded that daytime noise generation would not have the potential to result in significant impacts. Although such activities generally would not be conducted at night, nighttime activities were considered. In cases where nighttime noise thresholds could be exceeded, mitigation measures were included that would require such activity be conducted during daytime. The Proposed Program utilizes the same methods and equipment as scenarios previously evaluated in the PEIR (Volume 3; Appendix B of the Statewide PEIR); therefore, the three new scenarios would have no new significant impacts on noise, nor substantially increase the severity of significant impacts identified in the PEIR.

Population and housing were considered in the PEIR. As with the Statewide Program, the Proposed Program would not require additional staff for implementation, nor would it involve construction or movement of housing. It would also not result in the construction of infrastructure or involve activities that could indirectly alter population growth. Therefore, the three new scenarios would have no new significant impacts on population and housing, nor substantially increase the severity of significant impacts identified in the PEIR.

Public services were considered in the PEIR. As with the Statewide Program, the Proposed Program would have no effect on the demand for public facilities because it would not increase housing or involve activities that could cause a greater demand for public services. (See

Hazards section for hazardous material spill response in Volume 1; Main Body of the Statewide PEIR). It would also not include any activities that could interfere with provisions of public services. Therefore, the three new scenarios would have no new significant impacts on public services, nor substantially increase the severity of significant impacts identified in the PEIR. Transportation was considered in the PEIR. As in the Statewide Program, anticipated on-road vehicle use under the Proposed Program would be associated with personnel and equipment transport to and from work sites. Such trips would be limited to the duration and needs of the management activity at any given site. The effects on increased traffic would be intermittent and widespread and are not expected to have a substantial effect on regional or local roadways or the overall transportation system. In addition, many of these vehicle trips are already occurring as part of Statewide Program activities. Proposed Program activities would not exceed a level of service standard for congestion management, nor would they result in increased hazards due to design features, incompatible uses, or inadequate emergency access. Therefore, the three new scenarios would have no new significant impacts on transportation and traffic, nor substantially increase the severity of significant impacts identified in the PEIR.

Utilities and service systems were considered in the PEIR. Although host removal activities would be rare in the Proposed Program, should any vegetation require landfill disposal, all materials would be handled according to proper containment and treatment regulations associated with disposal as described in the PEIR. Because of the low volume of materials expected to be generated under Proposed Program activities, any effects on landfill facilities would be temporary and not include any long-term waste generation at any given location throughout the state. Thus, the effects on landfill facilities would be minimal. Additionally, as in the Statewide Program, the Proposed Program would not include the disturbance, creation, or need for utility systems, including water, sewage, wastewater, or storm water. Therefore, the three new scenarios would have no new significant impacts on utilities or service systems, nor substantially increase the severity of significant impacts identified in the PEIR.

The ERA and HHRA (Appendix 6A), along with the PEIR, were used to assist CDFA in assessing potential impacts to the environment and human health. Neither the ERA nor HHRA identified any new significant environmental or human health impacts or any substantial increase in the severity of significant effects identified in the PEIR due to the use of these scenarios in addition to previously analyzed treatment scenarios.

6. Conclusions

The CDFA Plant Health and Pest Prevention Division staff, with the assistance of the ERA and HHRA, did not identify any new significant environmental effects or a substantial increase in the severity of the significant effects identified in the PEIR. In addition, Division staff determined that no new information of substantial importance exists, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, that would require the preparation of a subsequent EIR. (See Appendix 6A).

7. References

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