

Statewide Plant Pest Prevention and Management Program

Scoping Report

Prepared for:

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October 2011

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Acronyms

Cal-IPC	California Invasive Plant Council
CDFA	California Department of Food and Agriculture
CEQA	California Environmental Quality Act
EIR	environmental impact report
LBAM	light brown apple moth
NOA	Notice of Availability
NOP	Notice of Preparation
PEIR	programmatic environmental impact report
Program	Statewide Pest Prevention and Management Program

Chapter 1

INTRODUCTION

Overview

This Scoping Report summarizes the comments and questions raised during the public scoping period for the preparation of a programmatic environmental impact report (PEIR) by the California Department of Food and Agriculture (CDFA) for the Statewide Plant Pest Prevention and Management Program (Program).

Scoping is the process conducted to determine the coverage, focus, and content of the PEIR as prescribed by the California Environmental Quality Act (CEQA). Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures for in-depth analysis in the PEIR. This process also helps to select methods of assessment, and to eliminate from detailed study those issues that are not relevant to the project or required under CEQA. In addition, scoping is an effective way to identify and consolidate the concerns of any interested parties, which may include project proponents and opponents, and interested federal, state, and local agencies, among others.

The scoping period during which interested parties were invited to comment on the environmental issues and concerns regarding the Program began on June 23, 2011 and ended on July 25, 2011. An additional scoping period was conducted in Los Angeles County between August 8, 2011 and September 9, 2011.

This Scoping Report includes:

- a brief description of the Program's purpose and need;
- a summary of the public scoping process;
- a summary of key issues identified during the scoping period; and
- a description of future steps to be taken in the environmental review process.

Purpose of the Program and PEIR

The Program would encompass the range of prevention and management activities, carried out by CDFA against plant pests throughout California. The statewide Program would include a variety of separate programs, designed for prevention and management of plant pests, and would identify numerous methods (or management approaches) for controlling them. These programs and management approaches would be intended for use in individual projects that could occur throughout California. Plant pests would include arthropods, plant pathogens, noxious weeds, and vertebrates. Pests and diseases of animals would not be included in the Program.

The Program would include plant pest prevention and management activities that could occur throughout California. Because of California's rich and diverse natural and agricultural environment, many plant and animal communities are present, and the potential exists for a variety of pests to occur in numerous areas. Plant pests may be found and prevention and management activities may occur in urban, rural, natural, and agricultural settings. The potential geographic extent of prevention and management activities for any particular plant pest would depend on the existence of suitable climatic and ecological conditions for the pest and its hosts, such as appropriate elevation and temperature. Projects could occur anywhere a particular pest was found, depending on the size and density of the pest population, and on the severity of threat to agriculture, natural lands, and/or urban populations. The specific area and extent of project activities (i.e., use of management approaches) would depend on the type of plant pest prevention and management program and management approaches available for use against the pest in the program.

The PEIR will describe CDFA's prevention and management programs and management approaches that are authorized for use against various plant pests. It will include a discussion of the process to be followed for conducting different types of programs and the process to identify management approaches available for use against a particular pest in a specific program. Furthermore, the PEIR will evaluate the potential environmental impacts of these programs and activities.

The PEIR also will provide a program framework that may be used for subsequent CEQA analysis, including: (1) tiering of project-level CEQA documentation for plant pest prevention and management activities implemented by CDFA and other agencies; and (2) integration of new plant pests and new prevention and management approaches.

Chapter 2

CEQA SCOPING PROCESS

The State CEQA Guidelines provide guidance for the scoping process. Scoping has the following general objectives:

1. to identify the concerns of the affected public and agencies;
2. to define the issues and alternatives that will be examined in detail in the environmental impact report (EIR) while simultaneously devoting less attention and time to issues that cause no concern; and
3. to appropriately scale the overall review process by obtaining early feedback on the scope and content of the EIR (environmental studies and evaluations then can be focused on areas and issues of concern).

CDFA is committed to a planning process that includes strong public involvement, is based on sound science, and is open and transparent.

Notice of Preparation

CEQA requires formal public announcement of the intent to prepare an EIR for a proposed project. In compliance with the State CEQA guidelines (14, California Code of Regulations, Section 15082), CDFA issued a Notice of Preparation (NOP) on June 23, 2011. The NOP presented general background information on the Program, the scoping process, the environmental uses to be addressed in the PEIR, and the anticipated uses of the PEIR.

The NOP invited the public to offer comments during the scoping period, which began on June 23, 2011. Initially, the NOP indicated that the close of the comment period would occur on July 19, 2011; however, to provide additional time for the submission of comments, CDFA extended the comment period through July 25, 2011. This extension of the comment period was noted online on the CDFA Web site and appropriately published in the outreach materials.

The comment period was extended in Los Angeles County. Although the extended comment period was intended for county residents possibly affected by the delayed NOP posting, all scoping comments received during this time were considered in this Program Scoping Report, regardless of origin. A copy of the NOP and Los Angeles County extension amendment is provided in Appendix A.

The NOP was mailed to each of the 58 California county clerks as well as various interested agencies and organizations. The NOP mailing list and related Program contact information are included in Appendix B.

Public Outreach

A press release was prepared regarding the scoping meetings and was posted on the CDFA's Web site (<http://www.cdfa.ca.gov/go/peir>) and in various print media (Appendix C). A list of the e-mail addresses that received the press release also is included in Appendix C. An invitation to participate was sent to various cities and counties via e-mail (Appendix D). A newspaper ad (Appendix E) was prepared and placed in the following publications.

CDFA Statewide Pest Prevention PEIR Newspaper Notices		
Newspaper	County	Date Published
The Davis Enterprise	Yolo	23 June 2011
The Bakersfield Californian	Kern	24 June 2011
Imperial Valley Press	Imperial	27 June 2011
The Fresno Bee	Fresno	27 June 2011
The Stockton Record	San Joaquin	28 June 2011
San Jose Mercury News	Santa Clara	27 June 2011
Desert Dispatch	San Bernardino	24 June 2011
The San Diego Union Tribune	San Diego	27 June 2011
Ventura County Star Newspaper	Ventura	28 June 2011
The Santa Cruz Sentinel	Santa Cruz	28 June 2011
The Tribune	San Luis Obispo	27 June 2011
Daily Republic	Solano	24 June 2011
The Orange County Register	Orange	27 June 2011
The Californian	Riverside	29 June 2011
North County Times	San Diego	29 June 2011
Orange Coast Daily Pilot	Orange	24 June 2011
The Triplicate	Del Norte	24 June 2011
The Record Searchlight	Shasta	28 June 2011
Ukiah Daily Journal	Mendocino	24 June 2011
Los Angeles Times	Los Angeles	30 June 2011
San Francisco Chronicle	San Francisco	27 June 2011
The Sacramento Bee	Sacramento	24 June 2011
The Chico Enterprise-Record/ The Oroville Mercury-Register	Butte	29 June 2011
The Times-Standard	Humboldt	23 June 2011
The Humboldt Beacon	Humboldt	30 June 2011

Affidavits certifying the publication of the newspaper notices also are included in Appendix E.

Public Meetings

To provide the public and regulatory agencies with an opportunity to ask questions and provide comments on the scope of the PEIR, several public scoping meetings were held during the NOP review period. CDFA conducted scoping meetings at five different locations throughout the state because of the Program's standing as a "project of statewide, regional, or area wide significance." These scoping meetings were held in Chico, Sacramento, Irvine, San Francisco, and Fresno to solicit input from the public and interested public agencies

regarding the nature and scope of environmental impacts to be addressed in the draft PEIR. The scoping meeting dates, times, and locations were as follows:

- **Chico, CA:** July 6, 2011, 5:30–7:30 p.m., Chico Municipal Center (421 Main Street, Chico, CA 95928)
- **Sacramento, CA:** July 7, 2011 5:30–7:30 p.m., Department of Health Care Services and Department of Public Health Building (1500 Capitol Avenue, Sacramento CA 95814)
- **Irvine, CA:** July 12, 2011, 5:30–7:30 p.m., Irvine Ranch Water District’s Duck Club (3512 Michelson Drive, Irvine, CA 92618)
- **San Francisco, CA:** July 13, 2011, 5:30–7:30 p.m., San Francisco Public Library (100 Larkin Street, San Francisco, CA 94102)
- **Fresno, CA:** July 14, 2011, 5:30–7:30 p.m., University of California, Fresno Business Center (5245 N. Backer Avenue, Fresno, CA 93740)

The July 7 meeting in Sacramento was simultaneously broadcast live as a “webinar” session via the Internet, for those interested in participating remotely. Webinar participants were able to view the meeting in real time and provide comments electronically on the scope of the PEIR.

Meeting Format

All meetings used the same format, and interested parties were invited to attend one or all meetings.

Reception

The public was welcomed to the meetings by CDFA staff at each location. At the greeting table, guests were asked to sign in and were given a brief description of the available handouts and process for public comment. The handouts included copies of the NOP (Appendix A), a Program Information sheet, a Program Frequently Asked Questions sheet, a Speaker Card, and a Comment Form (all included in Appendix F). Except for the Speaker Card and Comment Form, these items also were available as downloads on the CDFA PEIR Web site.

Several meeting posters (Appendix G) also were prepared for public viewing before and after each meeting. These posters were created to direct the public to the meeting site as well as to provide general orientation on the CEQA process and Program considerations.

Meeting

Each meeting began at approximately 5:30 p.m., with a presentation given by Horizon Water and Environment (Horizon) staff, the consulting firm leading the preparation of the PEIR (Appendix H). Michael Stevenson of Horizon provided a brief overview of the Program and the CEQA process. Ryan Jolley of Horizon then provided additional details, relating to

the objectives and range of activities to be included in the Program. A public comment session followed, during which time CDFA staff received public comments about the Program. In addition to oral comments, CDFA also accepted written comments during the meetings. Those attendees who provided comments during the scoping meetings were as follows:

Chico, CA

Al Beck
Louie Mendoza
Richard Price
Mary Pfeiffer
Jim Donnelly

Sacramento, CA

Mike Boitano
Nan Wishner
Ed Lavio
Lynn Elliot Harding
Frank Zalom
David Brown

Irvine, CA

A.G. Kawamura
John Kabashima

San Francisco, CA

Doug Johnson
Veronica Raymond

Fresno, CA

Bob Blakely
James McFarlane
Brian Domingoes
Ted Batkin
Marcy Martin
Carol Hafner

Near the conclusion of each meeting, CDFA staff reminded the attendees that written comments would be accepted anytime during the scoping period, which concluded on July 25, 2011.

Participating Staff

The following CDFA representatives and supporting consultants participated in one or more of the scoping meetings:

Department of Food and Agriculture

Dr. Robert Leavitt
Michele Dias
Laura Petro
David Pegos
Austin Webster
Steve Lyle

Horizon Water and Environment, LLC

Michael Stevenson
Ryan Jolley
Sandy Devoto
Josh Pollak

Meeting Attendance

At each meeting, attendees were asked but were not required to sign in and provide contact information. Seven people signed the attendance sheet at the Chico meeting; 20 people signed at the Sacramento meeting, with 6 additional individuals participating via the webinar; 2 people signed at the Irvine meeting; 7 people signed at the San Francisco meeting; and 12 people signed at the Fresno meeting (one of whom was a Program staff member). Copies of the attendance sheets are provided in Appendix I.

Chapter 3

SUMMARY OF COMMENTS RECEIVED

Introduction

All written and oral comments received in response to the NOP will be considered during preparation of the draft PEIR. Oral comments received during the scoping meetings were noted and summarized during each meeting. Speaker cards and notes, along with comments submitted during the meetings, are included in Appendix I. In addition to these meetings, 100 written comments were received via U.S. Mail, e-mail, and fax during the scoping period (Appendix J). The majority of the comments that were received supported development of the Program.

Review of Scoping Comments Received

To ensure that a neutral and transparent analysis is used to review and categorize all public comments received, this scoping report includes copies of the original documents submitted (see Appendix I and J). The issues presented below are not intended to replicate the comments received verbatim, but rather to provide a synopsis of the comments received and capture the general views and opinions of the commenters.

While analyzing all of the comments, several major themes emerged. The following pages summarize the comments received and report them categorically under these themes (the key issue headings that are introduced in **bold text** below). Each key issue is discussed in more detail in the following sections of this report.

- **General Issues** in the Program and PEIR
- **Integrated Pest Management** use in the Program and related considerations in the PEIR
- **Pesticide/Herbicide Use** in the Program and related considerations in the PEIR
- **Pest Prevention and Management** activities (besides those previously identified for integrated pest management and pesticide/herbicide use above) in the Program and related considerations in the PEIR.
- **Air Quality and Global Climate Change** evaluation in the PEIR
- **Agricultural Resources** evaluation in the PEIR
- **Biological Resources** evaluation in the PEIR
- **Human Health Risk** evaluation in the PEIR
- **Water Quality** evaluation in the PEIR
- **Transportation** evaluation in the PEIR

- **Alternatives** for consideration in the PEIR
- **Program Objectives/Goals** for inclusion in the PEIR
- **The CEQA Process** for the PEIR (neither in support or opposition)
- Comments specifically related to the **Notice of Preparation**

Comments which were not relevant to the CEQA process are described under **Issues Outside of the Scope of the PEIR**, including comments that offer **Support for the PEIR CEQA Process**, and those comments opposed to the Program and/or the PEIR, **Opposition to the PEIR CEQA Process**. Lastly, **Others** includes comments that do not fit under the other headings.

The following briefly summarizes the major perspectives from the review of all the comments:

- The vast majority of agricultural commissioners and members of the agricultural community support the program.
- Of the other commenters, the majority either wanted to see specific issues or activities addressed in the Program and/or PEIR or had concerns about the Program and/or PEIR.
- The most common concerns related to pest prevention and management approaches in the Program, especially pesticide/herbicide use. Specifically, some commenters wanted certain approaches considered or left out of the Program, and other commenters wanted certain aspects of pesticide/herbicide use evaluated in the PEIR.
- Additional common concerns regarded the programmatic approach, public involvement, impacts to human health and biological resources, and general comments on the PEIR.

Key Issues Relevant to the Environmental Review

The following comments were received on key issues relevant to the Program and preparation of the draft PEIR.

General Issues

- The noxious weed list should include invasive plant species listed by the California Invasive Plant Council (Cal-IPC) Inventory.
- Cumulative impacts from repeated exposure and to exposure to more than one substance should be considered.
- Pest groups should differentiate agricultural pests from wildlands pests.
- The public notification process and timeline to be implemented should be specified before any activities (especially spraying).

- Specific details should be included on the process of adding or removing a pest program or control techniques.
- Provisions to mandate usage of emerging techniques should be included if they are scientifically proven to be more effective and less toxic.
- The role of local governments in administering the program should be defined.
- Impacts on local urban communities from pesticides and planting restrictions should be included.
- A clear definition of the word “pest” should be provided.
- A discussion should be included regarding whether the light brown apple moth (LBAM) program is or is not included.
- How the PEIR would evaluate short and long-term impacts of individual pests should be considered because sometimes nature corrects invasive problems by itself and human interference hinders the process.
- The PEIR should have a “medical” section.
- Program effects on timber harvest plans in California should be considered.
- The fact that arundo is important for the banks and streams in Chico (for bank stabilization) should be included, although other areas may want to eradicate it.
- The effects of construction equipment and gravel piles used for construction to transfer invasive species should be considered.
- Although mitigation would be included in the Program, concern exists that it may not be carried out or adequately monitored (i.e., during construction), and this should be addressed.
- County programs should be included in the Program.
- Protocols and procedures should be established for immediate pest program health incident reporting, including training for first responders, MDs, vets, and the public as to where to report.
- The discussion of environmental issues should include impacts on farmers, particularly the cost of control as related to increased use of pesticides required to comply with quarantines.
- “Community resources” should be added to the list of environmental areas/objectives that the Program is trying to protect.
- How invasive species destroy life systems should be described, and the fact that CDFA has a nexus (responsibility) for protecting these life systems.
- The future economic and environmental costs of not acting quickly to control pests that are not conventional (i.e., Eucalyptus pests) should be considered because the damage they generate may cause more harm later on, when trees die (e.g., fire, fallen trees, death of heritage trees), creating further need for spraying or other control methods and perhaps resulting in larger environmental impacts.
- An analysis of invasive plants that are not listed as noxious should be considered.

- The Program should be revisited regularly, updated with new information, and be kept current.
- How the Program would deal with green waste management and what would happen with exports should be addressed.
- The effects of invasive pests on wild lands, natural ecosystems, industrial and urban forests, as well as agricultural lands should be considered.
- A discussion about damaging pests that are native to other areas of the United States, but not to California, should be included.
- The PEIR should comply with the CEQA requirement to describe the existing environment, although it may be difficult for this single PEIR document to describe the thousands of microclimates, landscapes, and communities in California.

Integrated Pest Management

- The integrated pest management approach should be treated carefully and should be clearly defined.
- The PEIR should be explicitly structured around integrated pest management strategies (defined by the University of California Integrated Pest Management approach) and should state that all management decisions are based on them.
- The PEIR should recognize the University of California Davis definition of Integrated Pest Management: *A pest management strategy that focuses on long-term prevention or suppression of pest problems through a combination of techniques such as encouraging biological control, use of resistant varieties, and adoption of alternate cultural practices such as modification of irrigation or pruning to make the habitat less conducive to pest development. Pesticides are used only when careful monitoring indicates they are needed according to pre-established guidelines, treatment thresholds, or to prevent pests from significantly interfering with the purposes for which plants are being grown.*
- The Program should include existing integrated pest management strategies and programs that have been proven or are fully developed, such as sterile insect technique, mating disruption, biological control agents, and biological pesticides.
- The PEIR should recognize that invasive and noxious plants threaten natural habitats and agricultural areas in California and need to be controlled using an integrated pest management approach.
- The PEIR should explain how pest population thresholds are used in the integrated pest management approach.

Pesticide/Herbicide Use

- The analysis of any given chemical product should include inert ingredients, such as surfactants, propellants, and attractants.

- The PEIR should state that pesticide use should be avoided, if possible, and the decision of whether or not to use chemicals in a specific invasive species management project should be based on an evaluation of both chemical and alternative treatments.
- The PEIR discussion regarding noxious weed control management should consider the California Native Plant Society's Herbicide Policy (adopted in 2008), including the following:
 - The decision to use herbicides in a specific weed management project is site-specific.
 - Herbicide treatment should have clear and achievable objectives, preferably including a gradual reduction or phase-out of the need for continued intervention.
 - Herbicide application personnel should be able to distinguish between the target weeds and native plants, particularly any native plants of concern, and should avoid herbicide drift.
 - Adverse impacts from herbicide use to natural resources, such as pollinators, wildlife, and water; and to people, their property, and cultural resources should be avoided or mitigated.
 - Public notification and posting of herbicide application sites should be required on public lands, and on private lands where the public may be affected, such as near public roads.
- The PEIR should analyze the direct, indirect, acute, ongoing, fatal and sublethal, and cumulative and synergistic impacts that pesticides have on species and habitats.
- The PEIR should include an analysis of pesticide drift and runoff.
- The PEIR should analyze pesticides that act as endocrine disruptors.
- The PEIR should state that spraying should not be applied near sensitive receptors (e.g., schools, hospitals).
- The PEIR should analyze the extent of pesticide contamination in California's air, waterways, and species impacted by pesticide contamination. To fully understand the impacts that the Program would have on species and habitat, the PEIR should provide a complete picture of current pesticide contamination throughout California. The PEIR should assess concentrations by daily and seasonal monitoring to reflect seasonal and climatic variations. The PEIR also should show test results for all pesticides currently and historically used in California and their degradation products so that CDFA has an accurate picture of how long pesticides endure in the environment.
- The PEIR should include mitigation measures to improve public outreach and notify the surrounding community of pesticide risks and what the community can do to help prevent the spread of plant pests.
- The PEIR should adequately measure and analyze pesticide degradation products.

- The PEIR should include mitigation measures to create incentives for farmers who voluntarily restrict pesticide application to levels below limitations already imposed by CDFA.
- The PEIR should include mitigation measures to limit the amount or frequency of pesticide use, only allowing pesticide application in ideal weather conditions to minimize the potential for spray drift and pesticide runoff.
- The PEIR should consider that evaluations of safe levels of exposure to toxic substances cannot wholly rely on the average responses found in the general population, but they must account for those found to be at greater risk, including children, pregnant women, the elderly, and those with compromised immune systems. Practices such as refraining from pesticide application at schools, hospitals, and playgrounds should be used whenever possible to avoid impacting those at special risk.
- The PEIR should include mitigation measures to incorporate pesticide contamination monitoring requirements for every CDFA-approved pest management approach that involves pesticide application. The monitoring requirements should include tracking results in a uniform database. Furthermore, the mitigation measures should require that samples should be collected before and after pesticide application from the surrounding atmosphere, soil, groundwater, nearby water bodies, and samples should be collected throughout the day and at various points throughout the seasons so that seasonal patterns and weather conditions do not distort monitoring results.
- The PEIR should reflect that for chemical measures, it is not sufficient to assume lack of impact simply because no studies exist (and this applies to both active and inert ingredients).
- The PEIR should address the possibility of environmental impacts from “inert” chemicals present in product formulas, and should cover chemical combinations where data is sparse or non-existent and name-brand products.
- The PEIR should address environmental impacts of non-disclosed chemicals present in product formulas or mixtures.
- The PEIR should include the contribution of medical experts in toxicology regarding chemical assessments and potential impacts.
- The PEIR should use research from people who are not connected with chemical manufacturers, allowing them to submit their own facts and data associated with health risks of chemicals.
- If the PEIR uses only a manufacturer’s data, it should reflect the bias that may be associated with that type of information.
- The PEIR should consider the economic impacts of health care, illnesses, and lost productivity related to pesticide use.
- The PEIR should reflect that the application of pesticides would go against the stated goal of providing a “safe food supply.”

- The Program should suggest establishing a medical review board to check into pesticide ingredients and usage risks.
- An organically approved pesticide should always be included as one of the management choices.
- The PEIR should discuss the concern regarding continued use of pesticides because they do not completely break down during the composting process and are returned back into the organic agriculture setting (e.g., bifenthrin, clopyralid, aminopyralid).
- The PEIR should identify chemical compounds and concentrations likely to be used, and contrast these on a scale identifying toxic exposure thresholds.
- Label restrictions may preclude repeated use of certain chemicals, and thus the importance of identifying various formulas and encouraging registration of such materials should be included, to avoid prohibition of use or decreases in Program effectiveness because of future pest resistance.
- Public testimony should be required at the time when the use of a particular pesticide agent is proposed for application, to guarantee appropriate consideration of toxicity.
- Aerial spraying should be systematically regarded as a method of last resort because it is inherently likely to affect non-target areas and non-target species and to have unintended impacts on human beings. Aerial spraying should never be employed in populated areas except in those rare circumstances when no reasonable alternative exists. In addition, all reasonable precautions should be taken to control the effects of such spraying on non-target organisms, human health, and the environment, and the least poisonous and least environmental-damaging chemical and means of application should be used.
- The most recent research on the impacts of pesticides on public health and the environment should be considered, such as University of California San Francisco's Program on Reproductive Health and the Environment.
- Avoidance of Persistent Organic Pollutants should be a priority. Any evaluation of this category of chemicals should include a review of the science leading to the Stockholm Convention banning their use, and the current or residual effects of these substances should be included in the review of synergistic long-term impacts.
- Pesticides should be a tool considered for controlling both invasive plants and insects.

Pest Prevention and Management

- The PEIR should clearly define and consider the scientific bases for CDFA's management assumptions, such as the assumption that non-native plant pests can be completely eradicated.
- The PEIR should clearly define and consider a rigorous evaluation of the effectiveness of current practices in terms of actual control or eradication of pests as well as impacts on the growers whose products and livelihoods pest management programs are intended to protect.

- The PEIR should clearly define and consider the criteria (if any) that CDFA uses to determine if non-native plant pests are a serious environmental risk and should be eradicated.
- A detailed analysis of prevention methods would be a valuable addition to the PEIR.
- For genuine prevention, strategies to keep pests from entering the state should be included.
- The PEIR should analyze CDFA's current "quarantine, eradication, and control" approach to managing non-native species, and whether other alternatives exist to this approach that would reduce and/or eliminate potential effects on the environment and public health.
- The use of border stations to implement and coordinate Program actions (interception and exclusion) should be included.
- Mitigation measures should be included to stop import of fruits and vegetables, to prevent invasive species from entering California.
- Detection and prevention methods that are identified in the Program should be proven effective.
- Early detection and prevention should be mentioned as a key step to reducing the need for pesticide applications (and other management actions) that would otherwise be needed once a species is established.
- A hierarchy of choices for pest management should be included (preventative/exclusionary first and cultural/biological next).
- A mention should be made that sterile insects also can pose risks to health and the environment.
- Composting green materials from quarantine zones should be considered as a mitigation measure to suppress the spread of pests.
- Once unknown species are positively identified, details for a flexible response should be incorporated so that the most targeted and effective control methods would be used for eradication. The PEIR should not limit itself to possibly "weak" programmatic control measures if "stronger," more effective methods may exist to control a particular species.
- The fact that pests do not spread rapidly and eradication seldom works should be noted and reviewed, because the LBAM proved to be a false threat.
- The Program should incorporate compost use to foster healthy soils and reduce the need for pesticides.
- Many counties have ongoing programs and experts who should be consulted/involved in the Program.
- The Program should modernize/enhance processes and tracking for recognition and identification of pests.
- The Program should establish an independent review board for any new pest of concern.

- Using and utilizing twenty-first century tools for prevention and detection should be continued, further researched and embraced—although a clear pathway to use stronger, proven tools should exist when necessary in dealing with difficult and problematic pests. The PEIR should include a robust toolbox of resources to employ to handle pest control processes so that the best method could be applied to get the job done.
- Emphasis should be placed on the use of a robust toolbox, to ensure that a variety of means (i.e., multiple approaches) would be available to control pests. The PEIR discussion should recognize the potential for resistance and incorporate the possibility for a family of chemicals to address an issue (if only one chemical was covered by the Program, then it may preclude the use of others that may be more effective).
- Rapid response should minimize effects and negative consequences of invading pests.
- The Program should emphasize early arrival detection and action, to prevent pests such as Africanized honeybees.
- The PEIR should include a noxious and invasive weeds program (including a license to use pesticides).

Air Quality and Global Climate Change

- The PEIR should consider addressing climate (change) impacts from the use of solvents, pesticides, and other chemical formulas.
- The air quality standards for particulate emissions from transportation and other activities should be applied for inert particulate matter in pesticides.
- The PEIR should clearly define and consider the impact of global warming on the movement of and rate of arrival and spread of pests in California, and the implications for the impacts and effectiveness of CDFA's existing/proposed programs as well as alternatives to the Program.

Agricultural Resources

- The discussion should include protection of organic farmers from drift and other methods that are not organic.
- The PEIR should include the economic hardship caused by quarantine zones, for those nurseries within such zones.
- The Program should consider the economic vitality of the food system by protecting jobs and the environment.

Biological Resources

- Very close scrutiny of natural areas in close proximity to agricultural areas should guide the PEIR.
- The PEIR should disclose impacts to non-target insects, such as native moths and pollinators.
- The PEIR should disclose impacts to vegetation and wildlife, especially threatened or endangered species.
- The PEIR should discuss ecological variation, such as control methods that differ in both efficacy and consequences, depending on location. Specifically, a detailed list of ecological categories should be created, and control choices should be systematically evaluated, relative to each category throughout the PEIR.
- The PEIR should discuss each pest and individual control method, and the discussion of each delivery system should detail possible effects on non-target organisms.
- The PEIR should identify the potential for elimination of invasive species to lead to broader negative environmental consequences that are not benign, and it should include compensatory mitigation.
- The PEIR should analyze contamination levels throughout California's waterways and determine the risks posed to aquatic species.
- The PEIR should develop a general procedure for identifying special-status species and mitigating any deleterious consequences, presenting a detailed discussion. However, because these impacts ordinarily would be highly site-specific, it may not be possible for the PEIR to cover them all.
- The PEIR should provide a significant benefit by delineating protocols that permit effective control methods to be implemented without violating the special character of designated wilderness areas (including federal wilderness areas).
- The PEIR should make a comprehensive evaluation of aquatic invasive species control methods to facilitate effective management.
- The PEIR should discuss the routine evaluation of each treatment method in relation to the riparian environment (i.e., an analysis that includes the method of application as well as the chemical treatment itself).
- The PEIR should analyze the numerous pesticides that one commenter claims have been identified as toxic to species located within California and listed under the federal and/or California Endangered Species Acts.
- The Program should adopt pest management approaches that limit or eliminate pesticide application and associated harms to listed species and their habitats.
- The PEIR should provide mitigation measures to prohibit pesticide application in habitats that are designated as critical habitats or candidate habitats under the federal and/or California Endangered Species Acts (i.e., non-designated habitats that are occupied by federally or state-listed species or sensitive species, sensitive

habitats, and riparian areas). The PEIR should prohibit pesticide application within the vicinity of sensitive receptors (i.e., no application around childcare facilities, eldercare facilities, and hospitals). The PEIR should establish buffer zones where no pesticides are to be sprayed within a certain distance of riparian areas (including subterranean water bodies), critical, candidate and sensitive habitats, and habitats occupied by state or federally listed species.

- The PEIR should document all of the specific effects to any flora and fauna that would be impacted by hormone-influencing products.
- The PEIR should state the proposed acceptable level of mortality for non-target species.
- The PEIR should discuss management activities for plant species listed on the Cal-IPC Inventory and Cal-IPC Watch List.
- The PEIR should describe the benefits of non-native species.
- It appears that the PEIR will assume that all non-native species are equally considered unwelcome; it should provide scientific reasoning for this.
- The PEIR should describe how herbicide use would impact native vegetation.
- The PEIR should indicate that CDFA has not yet obtained clearance to begin spraying from the U.S. Fish and Wildlife Service, related to the impact of spraying on endangered species. The PEIR should mention that APHIS has designated CDFA to find out if endangered species would be affected.

Human Health Risk

- Potential effects to farm workers should be very closely scrutinized in the PEIR.
- The PEIR should disclose impacts to human health, especially on vulnerable populations such as children, the elderly, and agricultural workers.
- The PEIR should include mitigation measures to establish and regularly review safety regulations and monitoring requirements that would limit the amount of exposure of farm workers to pesticides.
- Threshold for potential health impacts should be set to “completely avoid” or “not have” health impacts (not minimize effects).
- For any findings of a significant and unavoidable health impact, a statement of overriding considerations should not be adopted. Public health considerations should be placed above all else.
- The PEIR should consider addressing the effects of chemicals on people with various health conditions (e.g., pregnancies, cancer, MS, kidney damage, shingles, hyperactivity, insomnia, chemical allergy, thyroid deficiency, deficiencies of p45 and p50, etc.).
- The PEIR should discuss how the Program would protect individuals with documented health sensitivities or disabilities associated with pesticides. Mitigation

measures should provide relocation and compensation for property, if pesticides are used on their residences.

- The Program should describe the specific plans for achieving its human health program objective, and not just state that it is a goal.

Water Quality

- The PEIR should disclose impacts to water quality (including an assessment of the potential for drift and runoff).
- Impacts to water quality from pesticide applications should include: (1) direct discharge (spray drift); (2) indirect discharge (pesticide discharge with stormwater runoff); (3) discharge of pesticide contaminated plant debris; and (3) an eco-toxicity analysis (toxicity to aquatic life due to pesticide discharge).

Transportation

- The PEIR should consider ways to manage the potential of freight movement and uncovered loads that contribute to the spread of invasive species (e.g., hay transport along highways).
- The PEIR should address how prevention and maintenance management approaches would change or be incorporated into existing practices associated with construction/maintenance of public transportation facilities.
- The PEIR should mention that encroachment permits would be required for work or traffic control within state-controlled right-of-ways.
- The PEIR should consider costs and safety hazards associated with using personnel to manually apply/conduct eradication in areas exposed to traffic.

Alternatives

- The PEIR should include a transformational program alternative, using the policy framework that is to be prepared by University of California, Davis professors as part of a February 2012 retreat. Topics for this alternative would include a dichotomous residency policy, genetic observatories, control tools (e.g., endosymbiotic bacteria), arrival time of invasive pests, invasion lags, “sleeper” pests, and growers and trade.
- The PEIR should be structured so that it considers impacts of Program management activities and alternatives together, rather than addressing each potential management approach as an individual program alternative.
- The PEIR should consider an alternative based on true integrated pest management – one in which chemical control would be an absolute last resort. This alternative should consider using the least toxic chemicals and achieving pest management through various preventative practices, including establishment of thresholds for

pests and monitoring. If intervention is needed, primary reliance on the manual and cultural approaches that organic and sustainable growers use should be used.

- The PEIR should consider an alternative that would offer innovative methods to meet national and international trade requirements, other than chemical treatments, wide-area quarantines, and required treatment of growing areas. This alternative should explore diplomatic and other means for resolving concerns that establishment of non-native pest species in California could harm trade relationships with other states or countries, including removing or changing species' domestic legal classifications and establishing alternative forms of phytosanitary and grower-purchaser agreements that do not rely on chemical treatments on farms, in communities and in other non-agricultural areas.
- The PEIR should consider an alternative, or alternatives, that would include(s) mitigation measures to protect: 1) sensitive human populations, such as children, agricultural workers, and the elderly; 2) sensitive ecosystems and wildlife, including threatened and endangered species and aquatic habitats; 3) monitoring for impacts of program activities; and 4) independent scientific review of the risks posed by non-native pest species, and the health impacts of pesticides proposed for use in the Program.
- The PEIR should implement an alternative that would prohibit the use of all pesticides. Pesticide-free management approaches include programs or strategies that would interfere with pest breeding, locating plants in areas that are pest-free, utilizing crop rotation techniques, engaging natural predators, or luring pests away from plants.
- The PEIR should implement an alternative that would prohibit the use of the most toxic pesticides, including endocrine disruptors.
- The alternatives should include a completely different approach that would not include toxic chemicals or large-scale quarantines.
- The PEIR should include an alternative to expand the search for less toxic, effective pest management techniques by analyzing existing programs and techniques in use outside the jurisdiction of CDFA. The alternative should consider other states, other countries, and the invasives vision process in development at the University of California, Davis.
- The PEIR should consider approaches or alternatives other than application of pesticides to manage pests (less harmful to the environment). Public safety should come first.

Program Objectives/Goals

- The primary goal of the PEIR should be finding alternative ways to manage pests, to avoid adversely affecting human and environmental health through pest management.
- The PEIR should adopt the Statement of Principles developed by the California Invasive Species Advisory Committee as guiding principles, as follows:

- committing to manage invasive species in ways that advance environmental stewardship, economic development, and social equity, while ensuring human health;
 - building on successful existing programs in California and making new efforts to increase effectiveness in addressing invasive species, including effective coordination among public agencies and members of the public; and
 - keeping criteria for decision making clear and consistent, allowing such decision making to be based on a thorough assessment of the risks posed by target species and management approaches.
- CDFA should focus the PEIR on broad Program objectives.

The CEQA Process

- CDFA should clearly inform the public about the full scope and extent of pest prevention and management activities that are to be assessed in the PEIR. Specifically, CDFA should clearly inform the public as to whether the document would serve as a program- or project-level EIR.
- CDFA should convene a series of stakeholder meetings, in addition to those already held, during the development of the draft PEIR, to solicit stakeholder input on how to integrate new tools and practices into the Program.
- During the PEIR process, CDFA should spell out the criteria used for each stage of environmental review, and document the way these criteria have been addressed.
- Future revisions would be required for pest control mechanisms that have not been developed yet, and for possible negative consequences of existing substances and techniques that may be revealed by future scientific investigation. The PEIR should detail the methodology and schedule for future revisions, re-evaluation, and updates.
- The methodology for future revisions should include creation of an independent advisory committee that would monitor existing practices and provide recommendations to CDFA about methods that were effective and less-dependent on chemical pesticides and herbicides. The methodology also should describe how CDFA would respond to recommendations of the independent advisory committee.
- If no further CEQA analyses would be completed for future projects, the PEIR should inform the public of this fact and explain how specific activities would be implemented. For example, CDFA should explain how the public would be informed of future proposed actions that were already “covered” by the PEIR, and how and when their involvement and input would be welcomed.
- The public should be informed of the extent that the PEIR would limit or eliminate public participation in site-specific activities, or the public’s ability to challenge any such projects in court.
- If further (site-specific) CEQA analyses would not occur, the PEIR should comprehensively analyze all of the environmental and public health impacts of the

Department's pest prevention and management activities, including all direct, indirect, and cumulative impacts, as well as alternatives that may reduce those impacts, at the site-specific level. This would not replace EIRs for individual pest prevention programs.

- Stakeholders and critics should be involved in developing the PEIR.
- The Program should identify and describe other state agencies to be involved in the plant pest prevention and management process (such as the California Department of Public Health).
- CDFA should continue developing the PEIR but also should commit to releasing subsequent tiered EIRs, based on individual geographic regions, habitat types, species, pesticides, management approaches, or management programs. The PEIR should explicitly indicate what actions would trigger a subsequent EIR.

Notice of Preparation

- The PEIR should explain what is meant by “new or more significant impact.”
- The PEIR should explain what is meant by “emergency” and what process would be used to determine that something was an emergency.
- The PEIR should clearly define and consider CDFA's practice of declaring emergencies for pest eradication projects instead of following CEQA's procedures for preparing EIRs before taking action.
- The PEIR should clearly define and consider an analysis of how the PEIR would change the declaration of emergencies and/or address infestations that, by definition, were unexpected.
- The NOP section on Pest Detection and Response lacks specificity yet appears to be the basis of the Program; this should be clarified.
- For Rapid Response/Eradication, how would it be determined that the most effective approaches were being used?
- A discussion should be included as to how widely containment has been used as a response previously, relative to eradication. Whether a mechanism exists for eradication to become containment should be addressed.
- A provision should be included for public comment in the process of prescribing the use of pest management approaches.
- The PEIR should state how and by what standards the thresholds of significance were determined.

Issues Outside of the Scope of the PEIR

The following comments were determined to be outside of the scope of environmental review. These comments either were not related to the scope or content of the PEIR, or

were related to issues that are outside the scope of CEQA, or CDFA's authority and jurisdiction.

Support for the PEIR CEQA Process

- The PEIR and other measures to enhance the capacity of CDFA and its partners to deal with these pests would be supported.
- The PEIR process would provide an open decision-making process when invasive species were discovered (including continued public participation).
- The PEIR would save time and management steps.
- The statewide approach would help implement timely actions and effective programs in compliance with CEQA.
- Having the PEIR would allow control of invasive species when public opinion may otherwise question or disagree.
- The PEIR would help assure the public that methods being used to control species were chosen based on science and would be the best methods to use for control.
- The PEIR would be more effective and transparent than the existing plant pest prevention and maintenance process.
- CDFA should prepare a PEIR that evaluates CDFA's existing approach to pest management.

Opposition to the PEIR CEQA Process

- CDFA's ability to predict or analyze all of the on-the-ground environmental impacts in the PEIR would be highly unlikely.
- The idea of a PEIR that analyzes statewide impacts should be abandoned. Smaller-scoped EIRs should be created, based on individual geographic regions, habitat types, species, pesticides, management approaches, or management programs.
- The LBAM EIR, currently being challenged for attempting to evaluate impacts of a statewide program without any specific assessment of unique conditions at the locations where treatments may be used, utilizes the same strategy as proposed for the PEIR.
- The approach of developing a PEIR would thwart the basic principles of CEQA. Specifically, a PEIR would not include meaningful public input or adequate information for decision makers to evaluate environmental impacts.
- A Program with unspecified timing and location of effects would violate CEQA requirements for disclosure and inadequately assess potential impacts.
- A programmatic approach would not allow public participation when treatments actually occurred (i.e., a particular community may be sensitive to specific actions, which would only be known when the action was scheduled to occur; however, by then it would be too late to voice concerns).

- The Program approach would deny the right to public participation and information; it would institutionalize actions that could be problematic in the future, or misguided.
- Plant pest prevention and management should continue to be done at the local level so that local residents could participate in activities.
- The Program would be quickly outdated by future issues and technologies, and would impede the use of more effective tools down the road.
- The PEIR would be a waste of taxpayer money, undertaking a new and even broader proposal than that of the LBAM program.

Others

- The Program should include livestock disease (e.g., blue tongue, West Nile, rift valley fever, stomatitis virus) and related prevention.
- The PEIR should clearly define and consider the costs associated with CDFA's eradication and control programs, both to the state and to growers.
- CDFA is not a trustworthy agency and does not have the public interest at heart. Policies such as these would harm public safety and likely would be a result of partnerships with the wealthy and large Ag agencies.
- The Secretary of Agriculture's resume, including background qualifications, should be viewable.
- Whether CDFA would plan to set up an "oversight" group for pest detection and management (similar to the group for Asian citrus psyllid for California Citrus) should be known. If so, it would be important to know how such a group would effectively communicate with the public regarding pest infestation threats. Consider volunteer groups with similar interests should be used to help.
- Concern should be addressed about whether a monetary interest associated with using a particular pesticide would influence the incorporation of certain products into the Program.
- A list of errors made by CDFA in preparing the LBAM program should be included in the PEIR, including: (1) misrepresenting LBAM as emergency; (2) reporting agricultural damage when no damage occurred in California; (3) spraying a pheromone substance without reporting to residents that the product used was a category 3 toxin; (4) not conducting an inhalation test for danger before spraying pesticide, leading to the conclusion to not conduct a test based on incorrect assumptions of particle sizes; and (5) not responding to the over 600 reports of illness that occurred immediately after spraying.
- To reduce invasive pests, growers should instead try to plant crops suited to their climate and season.
- Declaring an emergency is a trick used by CDFA to obtain federal money, and the public should be assured that this would not happen for this Program.

- The PEIR should address whether the employees hired for the LBAM program are still working for CDFA and what funds are used to pay their salaries.
- The PEIR should address how potential defunding of weed management areas could impact noxious weed suppression/eradication efforts (possibly leading to greater fire incidents).
- Pest prevention and management programs should be funded both at the state and county levels, to maintain integrity of the system because of funding shortages.
- CDFA should have had meeting in Santa Cruz because of the LBAM incident.
- CDFA should realize that at both the national and state levels, a challenge of budget cuts would affect all programs to control invasive species.
- CDFA should encourage all stakeholders (i.e., public, state, and private) to become more educated about the threat of invasive species. Everyone should find new ways to fund an infrastructure to protect the resources of the state, if traditional means are not available.
- Chipped green material applied on agricultural land because of the closure of Puente Hills Landfill in Los Angeles County could contribute to the spread of imported pests if not handled properly.

Development of the Draft PEIR

Comments that relate to the scope and content of the CEQA analysis will be used to inform the analysis contained in the draft PEIR. Specifically, comments related to program alternatives, program coordination, and environmental considerations will be considered in preparation of the draft PEIR.

List of Topics to be Addressed in the PEIR

A detailed evaluation of potential environmental impacts will be provided in the draft PEIR for a variety of resource topics. A brief description of these resource topics and identification of key issues is provided next, based on preliminary evaluation and the scoping comments received. This is *not* intended to be a comprehensive list of all issues that will be evaluated in the draft PEIR, but this list provides an overview of some of the key issues that are planned to be discussed.

Agricultural Economics

Economic effects are not considered environmental impacts under CEQA, unless they have relevance to a physical impact. Therefore, the draft PEIR will identify whether economic effects of the Program could result in any physical impacts on the environment, for use in the discussion of resources topics required to be addressed under CEQA.

Agricultural and Forestry Resources

The draft PEIR will evaluate the potential for the Program to result in conversion of agricultural land (including forest land) to non-agricultural uses.

Air Quality

The draft PEIR will evaluate the potential emissions of criteria air pollutants and toxic air contaminants, and any related conflicts with applicable air quality plans, violations of air quality standards, cumulative emission of criteria air pollutants, exposure of sensitive receptors to substantial pollutant concentrations, and creation of objectivities odors.

Biological Resources

Key issues to be evaluated in the draft PEIR will include:

- effects of pesticide use on non-target biological organisms, including special-status species;
- effects of biological control agents on non-target biological organisms, including special-status species;
- effects on riparian habitat or other sensitive natural communities and federally protected wetlands;
- potential habitat fragmentation from host plant removal; and
- potential conflicts with habitat conservation plans or other plans.

Cultural Resources

The draft PEIR will evaluate the potential for the Program to result in disturbance to known or previously unidentified cultural resources.

Global Climate Change

The draft PEIR will evaluate the Program's potential to generate greenhouse gas emissions and/or conflict with plans to reduce greenhouse gas emissions.

Hazards and Hazardous Materials

Key issues to be evaluated in the draft PEIR will focus on the effects of pesticide use to human health, as well as potential for spills/accidental release of hazardous substances. The analysis would provide particular focus on sensitive populations (e.g., schools).

Noise

The draft PEIR will evaluate the potential for noise generation from equipment used for management approaches. This will include an assessment of the potential for exceedances of noise standards and temporary or permanent increases in ambient noise levels.

Water Quality and Hydrology

The draft PEIR will consider the potential for water quality degradation from pesticide use or other management approaches.

List of Topics to be Dismissed from Detailed Analysis in the Draft PEIR

Upon review of the nature and scope of the Program and the scoping comments received, little or no potential for significant impacts exist for several CEQA checklist resource topics; these topics are planned to be eliminated from detailed analysis in the draft PEIR. A brief description of these resource topics and considerations for their dismissal from further analysis in the draft PEIR is presented next; a similar description will be included in the draft PEIR.

Aesthetics

This topic will be dismissed from detailed analysis for several reasons, including the fact that alterations to aesthetics would be minor and only would occur temporarily, and that the Program would not involve new sources of light or glare.

Geology and Seismicity

The Program is not anticipated to expose individuals to increased geological or seismic hazards.

Land use and Planning

Pest prevention and management activities would not supersede regulations, policies, or requirements of other agencies besides CDFA, or authorize otherwise prohibited activities. Potential conflicts with habitat conservation plans will be discussed in the biological resources section.

Mineral Resources

Program activities would have no potential to affect mineral resources.

Population and Housing

The Program is not anticipated to result in growth, or displace persons or housing.

Public Services

The increase in demand for public services under the Program would be minimal.

Recreation

In general, the Program would not affect recreation. Restrictions in access to recreational areas would occur temporarily, if at all.

Traffic and Transportation

Vehicle use under the Program would be widespread and not concentrated at any one location.

Utilities and Service Systems

In general, the Program would not make substantial demands on utilities or service systems. Landfill disposal of host plants would be required in some instances, but at any location only a very small portion of landfill capacity would be required. The Program would not affect other utility services (e.g., wastewater production, water supply).

Ongoing Outreach

Comments received during the scoping period will help identify concerned parties and key stakeholders for ongoing outreach and coordination. Outreach will occur through Web page Program updates and mailings. Additional interested parties who want to receive mailings of Program updates or have questions are encouraged to send an e-mail to the following address: PEIR.info@cdfa.ca.gov.

Questions can also be mailed directly to CDFA's Project Manager, Michele Dias, at the following address:

Michele Dias, General Counsel
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Program Web Site Updates

The Program PEIR Web site (<http://www.cdfa.ca.gov/go/peir/>) will be available to the public throughout the CEQA process. The Web site will be updated for the public to review as additional information becomes available about the Program or the CEQA process. This will include notice regarding circulation of the draft PEIR and notification of the public comment period for the draft PEIR.

Technical Advisory Committee

CDFA plans to convene a technical advisory committee of individuals with expertise on the topics of pest management and related environmental effects. This committee is expected to help provide review and input on various aspects of the environmental analysis. The exact structure and process for the committee is still in development; CDFA plans to further define the role and approach for the committee and solicit applications for participation in the coming months.

Other Opportunities for Public Involvement

The public will have the opportunity to submit comments during the public review period for the draft PEIR. This comment period will begin with circulation of the draft PEIR. CDFA will announce the availability of the draft PEIR and comment period by issuing a public Notice of Availability (NOA) to the State Clearinghouse, the 58 California county clerks, and other interested individuals and agencies (via standard mail and e-mail). CDFA will also post the NOA on the Program PEIR Web site and issue newspaper announcements as appropriate. The draft PEIR will be made available for download in electronic version on the Web site, and to the extent feasible, as a hard copy upon written request to CDFA. Interested individuals, agencies and organizations will be able to submit comments throughout the comment period, either online at the Program PEIR Web site or by mailing comments to CDFA, as directed in the public notice.

During the public review period CDFA also will conduct public meetings throughout California at accessible locations. The public meetings are anticipated to include a brief presentation regarding the content of the draft PEIR, the range of impacts analyzed, and the process being undertaken to produce the final PEIR. Comments from the public will be accepted at these meetings, orally or in a written format.

Appendix A
NOTICE OF PREPARATION

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Notice of Preparation

To: Responsible, Federal and Trustee Agencies From: California Department of Food and
Agriculture

(Agency)

1220 N Street, Suite 400

(Address)

Sacramento, CA 95814

Subject: **Notice of Preparation of a Draft Environmental Impact Report**

The California Department of Food and Agriculture (CDFA) is the lead agency and is preparing a program environmental impact report (EIR) for the project identified below. CDFA would like input from your agency and interested members of the public regarding the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the program EIR prepared by CDFA when considering any permit or other approval related to the proposed project.

The project description, location, and potential environmental effects are contained in the attached materials. A copy of the initial study ☐ *is* ☒ *is not* attached.

Because of the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Michele Dias at the address above. Please include your name or the name of a contact person in your agency.

Project Title: Statewide Plant Pest Prevention and Management Program

Project Applicant, if any: n/a

Date: June 23, 2011

Signature: 

Title: Acting Chief Counsel

Email: PEIR.info@cdfa.ca.gov

Reference: Cal. Code Regs., tit. 14, (CEQA Guidelines) Sections 15082, subd. (a), 15103, 15375.

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STATEWIDE PLANT PEST PREVENTION AND MANAGEMENT PROGRAM

1. Introduction

The California Department of Food and Agriculture (CDFA) is currently developing a program Environmental Impact Report (EIR) for the proposed Statewide Plant Pest Prevention and Management Program (Statewide Program), described below. The overall goal of the Statewide Program is to evaluate the range of plant pest prevention and management activities currently implemented by CDFA and its partners throughout California and those that are likely to occur in the reasonably foreseeable future.

The Program EIR will be prepared by CDFA in accordance with the provisions of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. CDFA will be the lead agency pursuant to CEQA and will consider comments from responsible and trustee agencies, property owners, and interested persons and parties regarding the scope and content of the environmental information to be included in the EIR.

2. Project Area

The Statewide Program includes plant pest prevention and management activities that could occur throughout California (see Figure 1). Due to California's rich and diverse natural and agricultural environment, many plant and animal communities are present, and the potential exists for a variety of pests to occur in a variety of areas. Plant pests may be found and prevention activities may occur in urban, rural, natural, and agricultural settings. The potential geographic extent of prevention and management activities for any particular plant pest depends on the existence of suitable climatic and ecological conditions for the pest and its hosts, such as appropriate elevation and temperature. Projects occur where the pests are found. The specific area and extent of use for management tactics depend on the size and density of the pest population, and the severity of threat to agriculture, natural lands, and/or urban populations, among a variety of other factors. For each pest group discussed in the EIR, the program area will be further defined.

3. Project Description

Program Purpose

The Statewide Plant Pest Prevention and Management Program (Statewide Program) encompasses the range of pest prevention activities carried out against plant pests by CDFA throughout California. The Statewide Program consists of a variety of programs designed

for prevention and management of plant pests, and identifies numerous methods for controlling them. These programs and management tactics are intended for use in individual projects that could occur throughout California. Plant pests include arthropods, plant pathogens, noxious weeds, and vertebrates. Animal pests and diseases are not included in the Statewide Program.

The Statewide Program EIR will describe CDFA's various prevention and management programs and the management tactics authorized for use against a variety of plant pests. The EIR will also evaluate the environmental impacts of these programs and activities. The EIR will provide a program framework that can be used for subsequent CEQA analysis, including tiering of project-level CEQA documentation for (1) plant pest prevention and management activities implemented by CDFA and other agencies; and (2) integration of new prevention and management tactics and new plant pests. To facilitate future use of the program EIR, pest prevention and management information will be organized into pest groups. This information will be designed to capture how and where a project can be implemented for similar types of pests, and the range of management tactics that can be used against particular pests.

Program Objectives

The Statewide Program has been designed to achieve the following objectives:

- Minimize the impacts of invasive plant pests to the state of California's various resources, including agricultural, biological, and water resources, by preventing the establishment of introduced invasive species;
- Minimize the impacts of management tactics to human health and the state of California's various resources, including agricultural, biological, and water resources;
- Promote the production of a safe, secure food supply;
- Support CDFA's goal of providing rapid response by developing a statewide plant pest prevention and management program to streamline project-level implementation activities and to integrate new pests as they are detected and new pest management tactics as they are developed;
- Develop a program that is broad enough to apply to a wide range of methods of management and pests groups in California;
- Be consistent with existing CDFA permits, protocols, and policies, including CDFA's State Water Resources Control Board (State Water Board) NPDES Permit; and
- Develop a checklist evaluation tool that (1) can be used by CDFA and other agencies to evaluate environmental impacts of specific projects and new pests or management tactics; and (2) can be understood and reviewed by the public.

Discretionary Actions

CDFA is mandated to prevent the introduction and spread of injurious insect or animal pest, plant diseases, and noxious weeds in California (California Food and Agriculture Code

[CFAC] Section 403). To meet this requirement, CDFA conducts a variety of activities. Collectively, these activities make up the Statewide Program. Many of these activities have been previously addressed by CEQA documents. This CEQA document is not intended to supplant prior CEQA efforts. Instead, it addresses the following discretionary actions:

- Authorization of existing CDFA pest prevention and management programs, to the extent that (and focusing on) changes in program characteristics, regulatory requirements, or physical conditions could potentially result in new or more significant impacts (compared to those disclosed in prior CEQA documents);
- Adoption of a project-level checklist for evaluation of potential impacts related to implementation of specific pest prevention and management activities;
- A methodology for evaluation of the environmental impacts related to new pests, pest management tactics, and pest prevention and management programs; and
- Promulgation of regulations related to the above actions.

Existing CDFA plant pest prevention and management programs and activities without the potential for new or more significant impacts than those previously disclosed in prior CEQA documents are not considered discretionary actions in the program EIR.

To the extent that the impacts of the activities described above are addressed in this program EIR, no additional CEQA compliance would be necessary. Note that CDFA conducts public outreach for all of its pest management activities, regardless of whether CEQA compliance is required. In providing CEQA coverage for the range of discretionary actions in the Statewide Program, the program EIR supports the CDFA's goal of rapid response by providing a framework for tiered CEQA analysis. When additional impacts that have not been disclosed in this program EIR could result from future activities, a tiered CEQA document could be prepared including public participation for the tiered document. Plant pest prevention and management activities requiring CEQA analysis that may be covered by the Statewide Program include:

- Implementation of individual projects;
- Authorization of newly developed management tactics or alteration of existing management tactics; and
- Program activities for specific pest species or newly detected types of pests.

It should be noted that this EIR is not intended to address emergency projects. An "emergency" is defined as a "sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services" (Public Resources Code Section 21060.3). When CDFA determines that a newly identified pest population requires an emergency response, CDFA authorizes an emergency project. In accordance with the State CEQA Guidelines Section 15269, emergency projects authorized by CDFA are exempt from CEQA. However, use of the program EIR likely would decrease the time required for future CEQA evaluation and related implementation of pest control activities. Therefore, this program EIR likely would reduce the future need for CDFA to declare an emergency project in order to quickly respond to new pest infestations.

Statewide Program Components

The Statewide Program consists of three primary components: pest detection and response, pest prevention and management branches which implement and develop programs, and pest prevention and management projects carried out under these programs. Each of these components has a fundamental role in how CDFA conducts plant pest prevention and management activities.

Pest Detection and Response

In conducting pest detection and response, the Statewide Program is based on the principles of early detection and rapid response or containment, and use of the Integrated Pest Management (IPM) approach:

1. Early Detection: Early detection occurs through a collaborative effort between the U.S. Department of Agriculture (USDA), CDFA, county agricultural commissioners, and a large group of detection partners outside of these agencies, including private citizens. Detection of an invasive pest indicates the possible presence of an infestation. Once a detection occurs, a delimitation survey is conducted to determine whether an infestation exists and, if present, its boundaries.
2. Rapid Response/Eradication: When a new plant pest is discovered, or a previously discovered plant pest is identified in a new area, rapid response is essential to prevent the establishment of a pest. The goal of rapid response is to eradicate the pest, or rather prevent the establishment of a reproducing population. This occurs by reducing the replacement rate in the population to zero. CDFA, county agricultural commissioners, and others implement rapid response/eradication projects utilizing CDFA's guidance for different groups of pests and specific species of pests. Because most pests spread rapidly, the opportunity for rapid response typically has a brief window. As a result, the rapid response/eradication goal is most often feasible only for small, new infestations of plant pests.
3. Containment. Containment is pursued if rapid response/eradication is determined not to be feasible. Containment allows for the establishment of a reproducing population, but with the goal of maintaining the pest population density at a target density defined for the population. Similar to rapid response/eradication projects, containment projects are carried out utilizing CDFA's guidance for different groups of pests and specific species of pests by CDFA, county agricultural commissioners, and others.
4. Use of Integrated Pest Management Approach. CDFA incorporates several aspects of the IPM approach in developing programs and projects for plant pest prevention and management. CDFA's Use of IMP is implemented using a four-tiered approach, as follows:
 - Pest Identification
 - Pest Population Threshold
 - Selection of Management Tactics

- Monitoring

Pest Prevention and Management Branches

CDFA maintains multiple pest prevention and management branches under the Statewide Program. The scope of CDFA's pest prevention and management branches varies greatly; however, their general role is developing and implementing programs to facilitate prevention and management of specific types of pests; implementing projects; educating the public; developing and implementing management tactics; and carrying out other related duties. Pest prevention and management programs are developed and implemented by the Plant Health and Pest Prevention Services Division of CDFA. Within this division, programs are administered by four separate branches: Plant Pest Diagnostics, Pest Detection/Emergency Projects, Integrated Pest Control, and Pest Exclusions.

Pest Prevention and Management Projects

A pest prevention project can generally be described as the implementation of a management tactic, or set of management tactics, against a pest. Management tactics are continuously being developed by CDFA and other agencies and organizations. Three general types of pest prevention projects may be implemented, including:

- Eradication Projects
- Containment Projects
- Quarantines

Description of Management Tactics

A management tactic reduces the density of a pest population by affecting an aspect of the life system (or the target) of the pest population. Several types of methods can be used to control pests, including the following:

- **Cultural.** Cultural management tactics include any technique that indirectly alters environmental or other factors related to the survival of a pest population in a manner that reduces the size of the population.
- **Physical.** Physical management tactics include the use of human or mechanical means to remove or control a pest or host, or the use of physical barriers to isolate a pest or host.
- **Biological.** Biological management tactics involve the use of biological organisms to reduce the number or density of pests in a pest population.
- **Chemical.** Chemical management tactics use pesticides to kill a pest or host directly, or pheromones to alter the behavior of the pest resulting in density reduction; chemical controls often include the use of baits, traps, lures, and attractants.
- **Regulatory.** Regulatory management tactics restrict or limit human activities in order to restrict the artificial movement of a pest or host (e.g., quarantine activities);

restrictions typically prevent an activity from occurring or limit how the activity occurs.

The EIR will identify the types of management tactics used, or recommended for use, by CDFA, as well as a general discussion of the use of the each management tactic and CDFA's process for developing certain types of management tactics.

Pest Groups and Authorized CDFA Pest Prevention and Management Programs

CDFA conducts and oversees control programs for several classifications of pests. Within each of these control programs, pests are grouped based on similar aspects of biology and control. For each pest group, the EIR will provide information on the potential geographic distribution of the pest and CDFA's guidance on conducting pest prevention and management activities, including detection and project implementation, potential targets for management tactics, and use of authorized management tactics against the pest. Pest groups included in the following control programs will be discussed in detail in the EIR:

- **Invasive Arthropod Control Programs**, including for fruit flies, moths, beetles, and plant diseases – vector control;
- **Noxious Weed Control Program**, including for terrestrial weeds, hydrilla and other aquatic weeds;
- **Vertebrate Pest Control Program**; and
- **Quarantine Programs**, including for fruit flies, moths, plant diseases- vector control, noxious weeds, and plant diseases/pathogens, among others.

4. CEQA Process

Notice of Preparation

This Notice of Preparation (NOP) presents general information on the Statewide Program, the scoping and larger CEQA process, and the environmental issues to be addressed in the EIR. CDFA has prepared this NOP pursuant to CEQA Guidelines section 15082.

Scoping Meetings

In order for the public and agencies to have an opportunity to ask questions and submit comments on the scope of the EIR, several public scoping meetings will be held during the NOP review period. Because the Statewide Program is a “project of statewide, regional, or areawide significance,” the scoping meetings will be conducted in five different locations throughout the State. The scoping meetings will be held to solicit input from the public and interested public agencies regarding the nature and scope of environmental impacts to be addressed in the draft EIR.

All five meetings will use the same format and interested parties may attend one or all meetings. A brief presentation will be made in order to provide an overview of the Statewide Program and the CEQA process. Afterwards, CDFA staff will accept public comments on the Statewide Program. Oral comments will be noted and considered at the meetings, and written comments will be accepted both during the meetings as well as anytime during the 30-day scoping period. Comment forms will be available at the scoping meetings for those who wish to submit written comments during or at the meeting.

The dates, times, and exact locations of the public scoping meetings are scheduled for:

- July 6th 2011, 5:30 – 7:30 PM
Chico Municipal Center
421 Main Street
Chico, CA 95928
- July 7th 2011, 5:30 – 7:30 PM
Department of Health Care
Services and Department of
Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814
- July 12th 2011, 5:30 – 7:30 PM
Irvine Ranch Water District's
Duck Club
3512 Michelson Drive
Irvine, CA 92618
- July 13th 2011, 5:30 – 7:30 PM
San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102
- July 14th 2011, 5:30 – 7:30 PM
UC Fresno Business Center
5245 N. Backer Ave
Fresno, CA 93740

In addition, the July 7th meeting in Sacramento will be broadcast live as a 'webinar' session through the internet for those interested in participating remotely. Webinar participants will be able to view the meeting in real time and provide comments on the scope of the EIR. To participate via the webinar session, please sign up at:

<https://www2.gotomeeting.com/register/926803362>

This scoping meeting information will also be published in local newspapers and the CDFA's Statewide Program website (<http://www.cdfa.ca.gov/go/peir>).

Draft EIR

The primary purpose of the EIR is to analyze and disclose the direct and reasonably foreseeable indirect environmental impacts that may occur as a result of the Statewide Program. The draft EIR, as informed by public and agency input through the scoping period, will analyze and disclose the potentially significant environmental impacts associated with the Program and, where any such impacts are significant, potentially feasible mitigation measures and alternatives that substantially lessen or avoid such effects will be identified and discussed.

Below is a preliminary list of potential environmental issues to be addressed in detail in the EIR. The analysis in the draft EIR ultimately will determine whether these impacts could reasonably occur, whether such direct or reasonably foreseeable indirect impacts are

significant based on the identified threshold of significance, and whether such impacts can be avoided or substantially lessened by potentially feasible mitigation measures and alternatives.

- Aesthetics
- Agricultural Resources
- Air quality
- Biological Resources
- Climate Change
- Cultural Resources
- Geology, Soils, and Seismicity
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Utilities
- Recreation
- Transportation and Traffic
- Cumulative Impacts
- Irreversible Impacts

As part of the environmental analysis, CDFA will be preparing comprehensive human health and ecological risk assessment, to evaluate the in more detail the potential risks associated with the use of various compounds under the Program.

Public Review of the Draft EIR

Once the draft EIR is completed, it will undergo public review for a minimum of 45 days. CDFA is also planning to hold several public meeting. The meetings will begin with a brief overview of the analysis and conclusions set forth in the draft EIR. This introductory presentation will then be followed by the opportunity for interested members of the public to provide oral comments to CDFA regarding the Statewide Program under CEQA. The date, time, and exact location of the public meetings will be published in local newspapers prior to the event.

Final EIR

Written and oral comments received in response to the draft EIR will be addressed in a Response to Comments document which; together with the draft EIR will constitute the final EIR. The Final EIR, in turn, will inform the CDFA's exercise of discretion as a lead agency under CEQA in deciding whether or how to approve the Statewide Program.

5. Submittal of Scoping Comments

This NOP is being circulated to local, state, and federal agencies, and to interested organizations and individuals who may wish to review and comment on the Program at this stage in the process. In addition, CDFA has created a website where individuals can access Statewide Program documents and keep informed of the overall progress and upcoming scheduled events. Interested persons are encouraged to visit the Statewide Program website (<http://www.cdfa.ca.gov/go/peir>). Written comments concerning the scope and content of this EIR are welcome.

Due to the time limits mandated by State law for public review of an NOP, your response to and input regarding the scope of the EIR should be sent at the earliest possible date, but **not later than** ~~Tuesday July 19th, 2011~~ ^{Monday July 25, 2011}. Please include a name, address, and telephone number of a contact person for all future correspondence related to the Statewide Program. Send your comments to:

**California Department of Food and Agriculture
Attn: Michele Dias, Acting Chief Counsel
1220 N Street, Suite 400
Sacramento, CA 95814**

Or email:
PEIR.info@cdfa.ca.gov

PUBLICATION DATE: June 23, 2011

Signature:



Michele Dias, Project Manager

Attachments:

1- Program Area Map



Appendix B
NOTICE OF PREPARATION MAILING LIST

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County Clerk Mailing List

Alameda County Clerk-Recorder's Office
1106 Madison Street, First Floor
Oakland, CA 94607

Alpine County Clerk's office
99 Water Street
Markleeville, CA 96120

Recorder-Clerk
810 Court Street
Jackson, CA 95642

Butte County Recorder
25 County Center Drive
Oroville, CA 95965

Calaveras County Clerks Office
891 Mountain Ranch Road
San Andreas, CA 95249

Colusa County Recorder
546 Jay Street, Suite 200
Colusa, CA 95932

Contra Costa County Recorder
555 Escobar St.
Martinez, CA 94553

Recorder's office
981 H Street, Suite 160
Crescent City, CA 95531

El Dorado County Recorder
360 Fair Lane
Placerville, CA 95667

Fresno County Clerk
2221 Kern Street
Fresno, CA 93721

Glenn County
526 W. Sycamore Street
Willows, CA 95988

Humboldt County Recorder
825 5th Street Fifth Floor
Eureka, CA 95501

Imperial County Recorder
P. O. Box 1560
El Centro, CA 92243

Inyo County Clerk Recorder
P.O. Box F
Independence, CA 93526

Kern County Clerk
1115 Truxtun Ave.
Bakersfield, CA 93301

Kings County Clerk
1400 West Lacey Blvd.
Hanford, CA 93230

Lake County Recorder
255 North Forbes
Lakeport, CA 95453

County Clerk-Recorder
220 South Lassen St Suite 5
Susanville, CA 96130

Registrar-Recorder/County Clerk
12400 IMPERIAL HIGHWAY
Norwalk, CA 90650

Madera County Clerk
200 West 4th Street
Madera, CA 93637

Marin County Clerk
Rm 247, Hall of Justice
3501 Civic Center Dr
San Rafael, CA 94903

Mariposa County Clerk
4982 10th Street
Mariposa, CA 95338

Mendocino County Assessor-County Clerk-
Recorder
501 Low Gap Rd., Room 1020
Ukiah, CA 95482

Merced County Recorder
2222 M Street, Room 14
Merced, CA 95340

Modoc Recorder's Office
204 South Court St.
Alturas, CA 96101

Mono County Clerk
Annex I, 74 School St.
(Library Building, First Floor)
Bridgeport, CA 93517

Monterey County
168 West Alisal Street, 1st Floor
Salinas, CA 93901

Napa County Clerk
900 Coombs St # 116
Napa, CA 94559

Nevada County Clerk
950 Maidu Ave
Nevada, CA 95959

Orange Clerk-Recorder Office
12 Civic Center Plaza, Rooms 101 and 106
Santa Ana, CA 92701

County Clerk Mailing List

Placer County Clerk
2954 Richardson Drive
Auburn, CA 95603

Plumas County Clerk-Recorder
520 Main Street, Room 102
Quincy, CA 95971

Riverside County Clerk
County Administrative Center 4080
Lemon St, 1st Floor
Riverside, CA 92502

Sacramento County Clerk/Recorder
600 8th Street
Sacramento, CA 95814

San Benito County Clerk
440 5th St., Room 206, County Courthouse
Hollister, CA 95023

San Bernardino County Clerk
222 West Hospitality Lane
San Bernardino, CA 92415

San Diego County Clerk
1600 Pacific Hwy # 260
San Diego, CA 92101

San Francisco County Clerk
City Hall, Room 168
San Francisco, CA 94102

San Joaquin Recorder County Clerk
44 North San Joaquin Street, suite 260,
second floor
Stockton, Ca 95202

SLO Clerk-Recorder
1055 Monterey St., Ste. D-120
San Luis Obispo, CA 93408

San Mateo County Clerk
555 County Center,
First Floor
Redwood City, CA 94063

Santa Barbara County Clerk-Recorder
1100 Anacapa St.,
Santa Barbara, CA 93102

Santa Clara County Clerk-Recorder
70 West Hedding, East Wing, First Floor
San Jose, CA 95110

Santa Cruz County Recorder
701 Ocean Street, Rm 210
Santa Cruz, CA 95060

Shasta County Recorder
1643 Market Street
Redding, CA 96099

Sierra County Recorder
P.O. Drawer D, 100 Courthouse Square,
Suite 11
Downieville, CA 95936

Siskiyou County Clerk
510 North Main St.
Yreka, CA 96097

Solano County Clerk of the Board
675 Texas Street, Suite 6500
Fairfield, CA 94533

Sonoma County Clerk
2300 County Center Drive, Suite B177
Santa Rosa, CA 95403

Stanislaus County Clerk-Recorder
1021 I Street, Suite 101
Modesto, CA 95354

Board Clerk's Office
433 2nd Street
Yuba City, CA 95991

Tehama County Recorder
633 Washington Street, Room 11
Red Bluff, CA 96080

Trinity County Recorder
101 Court Street
Weaverville, CA 96093

Tulare County Recorder
County Civic Center, 221 South Mooney
Boulevard
Visalia, CA 93291

Tuolumne County Clerk
2 South Green Street, 2nd Floor
Sonora, CA 95370

Ventura County Recorder Officer
800 S. Victoria Ave.
Ventura, CA 93009

Yolo County Clerk
625 Court Street, Room B01, Woodland,
CA 95695

Yuba County Clerk Recorder
915 8th St., Suite 107
Marysville, CA 95901

Cities and Counties Notified by CDFA	
Counties	Sent On
Alameda	6/30/2011
Contra Costa	7/21/2011
Fresno	7/21/2011
Kern	7/21/2011
LA County	7/21/2011
Marin	6/30/2011
Monterey	6/30/2011
Orange	7/21/2011
Riverside	7/21/2011
San Bernardino	7/21/2011
San Diego	7/21/2011
San Francisco	6/30/2011
San Joaquin	7/21/2011
San Mateo	7/21/2011
Santa Cruz	6/30/2011
Sonoma	7/21/2011
Stanislaus	7/21/2011
Ventura	7/21/2011
Cities	
Alameda	6/30/2011
Albany	6/30/2011
Anaheim	7/22/2011
Bakersfield	7/21/2011
Belvedere	6/30/2011
Berkeley	6/30/2011
Capitola	6/30/2011
Carmel-By-The--Sea	6/30/2011
Chula Vista	7/21/2011
Concord	7/21/2011
Corona	7/21/2011
Corte Madera	6/30/2011
Del Ray Oaks	6/30/2011
Dublin	6/30/2011
Elk Grove	7/21/2011
Emeryville	6/30/2011
Fairfax	6/30/2011
Fontana	7/21/2011
Fremont	6/30/2011
Fremont	7/21/2011
Fresno	7/22/2011
Fullerton	7/21/2011
Garden Grove	7/21/2011
Glendale	7/21/2011
Gonzales	6/30/2011
Greenfield	6/30/2011

Hayward	6/30/2011
Hayward	7/21/2011
Huntington Beach	7/21/2011
Irvine	7/21/2011
King City	6/30/2011
Lancaster	7/21/2011
Larkspur	6/30/2011
Livermore	6/30/2011
Long Beach	7/21/2011
Los Angeles	7/21/2011
Marina	6/30/2011
Mill Valley	6/30/2011
Modesto	7/21/2011
Monterey	6/30/2011
Moreno Valley	7/21/2011
Newark	6/30/2011
Novato	6/30/2011
Oakland	6/30/2011
Oakland	7/21/2011
Oceanside	7/21/2011
Ontario	7/22/2011
Orange	7/21/2011
Oxnard	7/21/2011
Pacific Grove	6/30/2011
Palmdale	7/21/2011
Pasadena	7/21/2011
Piedmont	6/30/2011
Rancho Cucamonga	7/21/2011
Riverside	7/21/2011
Roseville	7/21/2011
Ross	6/30/2011
Sacramento	7/21/2011
Salinas	6/30/2011
Salinas	7/21/2011
San Angelo	6/30/2011
San Diego	7/21/2011
San Francisco	6/30/2011
San Francisco	7/21/2011
San Jose	7/21/2011
San Leandro	6/30/2011
San Rafael	6/30/2011
Sand City	6/30/2011
Santa Ana	7/21/2011
Santa Clara	7/21/2011
Santa Clarita	7/21/2011
Santa Cruz	6/30/2011
Santa Rosa	7/21/2011
Scotts Valley	6/30/2011

Seaside	6/30/2011
Simi Valley	7/21/2011
Soledad	6/30/2011
Stockton	7/22/2011
Sunnyvale	7/21/2011
Thousand Oaks	7/21/2011
Tiburon	6/30/2011
Torrance	7/21/2011
Vallejo	7/21/2011
Victorville	7/21/2011
Visalia	7/21/2011
Watsonville	6/30/2011

CALIFORNIA DEPARTMENT of FOOD and AGRICULTURE
PLANT PEST PREVENTION and MANAGEMENT PROGRAM – EIR
Responsible Agency Representatives

California Natural Resources Agency

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California Environmental Protection Agency

Office of Environmental Health Hazard Assessment

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Office of Environmental Justice, Tribal & Border Affairs

Ricardo Martinez Garcia
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Department of Pesticide Review

Marylou N. Verder-Carlos, DVM, MPVM
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State Water Resources Control Board[s]

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NPDES Wastewater Unit, Division of Water Quality
1001 I Street, 15th Floor
Sacramento, CA 95814
Phone: (916) 341-5544
pisorena@waterboards.ca.gov

Office of Toxic Substance Control

Not interested, per Sandy

Air Resources Board

CAL EMA

Helen Lopez
Chief of Staff
3650 Schriever Avenue
Mather, California 95655
(916) 845-8534 office
(916) 612-9009 cell
helen.lopez@calema.ca.gov

University of California

Dan Dooley [suggested by Secretary Ross]
Sr Vice President for External Relations

BAY AREA COUNTIES - CITY ATTORNEY CONTACTS

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Alameda	Donna Mooney	510-747-4570	510-865-4028	attorney@ci.alameda.ca.us
Albany	Robert Zweben	510-528-5858		
Berkeley	N/A	510-981-6950	510-981-6960	attorney@cityofberkeley.info
Dublin	John Pattillo, City Mgr.	925-833-6650	925-833-6651	city.manager@dublin.ca.gov
Emeryville	Michael G. Biddle	510-596-4370	510-596-3724	City_Attorney@ci.emeryville.ca.us
Fremont	N/A	510-284-4030	510-284-4031	cityattorneysoffice@fremont.gov
Hayward	Michael Lawson	510-583-4455	510-583-3660	Michael.Lawson@hayward-ca.gov
Livermore	John Pomidor	925-960-4150		cityattorney@ci.livermore.ca.us
Newark	Gary Galliano	510-578-4000	510-578-4306	city.attorney@newark.org
Oakland	Barbara Parker, Acting	510-238-3601	510-238-6500	webmaster@oaklandcityattorney.org info@oaklandcityattorney.org
Piedmont	c/o City Clerk's Office	510-420-3040		jtulloch@ci.piedmont.ca.us
San Leandro	Jayne Williams	510-577-6095		jwilliams@meyersnave.com
SANTA CRUZ CO.	CITY ATTORNEY NAME	PHONE	FAX	E-MAIL
Capitola	John G. Barisone	831-420-6200	N/A	Jbarisone@abc-law.com
Santa Cruz	John G. Barisone	831-420-6200	N/A	Jbarisone@abc-law.com
Scotts Valley	Kristen Powell	831-440-5604	831-438-2793	Kpowell@loganpowell.com
Watsonville	Alan J. Smith	831-768-3030	N/A	Cityattorney@ci.watsonville.ca.us

BAY AREA COUNTIES - CITY ATTORNEY CONTACTS

SAN FRANCISCO CO.	CITY ATTORNEY NAME	PHONE	FAX	E-MAIL
San Francisco	Dennis J. Herrera	415-554-4700	416-554-4745	cityattorney@sfgov.org
City/County Of				
MARIN CO.	CITY ATTORNEY NAME	PHONE	FAX	E-MAIL
Belvedere	Rob Epstein	415-435-3838	415-544-3060	repstein@cityofbelvedere.org
Corte Madera	Jeffrey A. Walter	415-927-5050	415-927-5087	administration@cio.corte-madera.ca.us
Fairfax	Judy Anderson (clerk)	415-458-2343	415-453-1618	janderson@townoffairfax.org
Larkspur	Mr. Sky Woodruff	415-927-5110	415-927-5022	lk_admin@larkspurcityhall.org
Mill Valley	James McCann, City Mgr.	415-388-4033		citymanager@cityofmillvalley.org
Novato	Jeffrey A. Walter	415-899-8900	415-899-8213	City@novato.org
Ross	Gary Broad, Town Mgr.	415-453-1453	415-453-1950	E-mail linked to website for Town Mgr: http://www.townofross.org/pages/contact/email_broad.html
San Anselmo	Rob Epstein	415-435-3838	415-544-3060	repstein@cityofbelvedere.org
San Rafael	Rob Epstein	415-435-3838	415-544-3060	repstein@cityofbelvedere.org
Tiburon	Rob Epstein	415-435-3838	415-544-3060	repstein@cityofbelvedere.org

Appendix C
PRESS RELEASE

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News Release

CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE



Media Contacts:

Steve Lyle, CDFA Public Affairs, (916) 654-0462, slyle@cdfa.ca.gov

NOTICE OF PREPARATION ANNOUNCED, SCOPING SESSIONS SCHEDULED FOR CDFA STATEWIDE PLANT PEST PREVENTION AND MANAGEMENT PROGRAM EIR



Focus to include principles of integrated pest management

SACRAMENTO, June 23, 2011 – The California Department of Food and Agriculture, in accordance with CEQA guidelines, is announcing a Notice of Preparation (NOP) for the Statewide Plant Prevention and Management Program Environmental Impact Report (EIR).

The EIR is a crucial step as CDFA carries out its responsibility to protect the state's food supply and natural resources, upon which Californians and many throughout the nation and world depend. Responding to invasive species such as plant pests and diseases is one of the primary ways that CDFA helps farmers and ranchers maintain a constant, dependable and safe supply of food.

The EIR document will provide an opportunity to analyze the frontline defense of the nation's food system through the principles of integrated pest management, using the latest science and technology. The final product will include a process to evaluate and include new developments and potential environmental impacts while providing for public participation throughout the pest management process.

CDFA is announcing public meetings to receive agency and public comments on the scope and content of the EIR. The schedule of scoping meetings is as follows:

CHICO

July 6th, 2011

5:30-7:30 PM

Chico Municipal Center

421 Main St

Chico, CA 95928

SACRAMENTO

July 7th, 2011

5:30-7:30 PM

Department of Health Care Services and

Department of Public Health building

1500 Capitol Ave

Sacramento, CA 95814

Note – A webinar is available for this meeting – to participate via the webinar, please sign up at:

<https://www2.gotomeeting.com/register/926803362>

ORANGE COUNTY

July 12th, 2011

5:30-7:30 PM

Irvine Ranch Water District's Duck Club

3512 Michelson Drive

Irvine, CA 92618

SAN FRANCISCO

July 13th, 2011

5:30-7:30 PM

San Francisco Public Library

100 Larkin St.

San Francisco, CA 94102

FRESNO

July 14th, 2011

5:30-7:30 PM

UC Fresno Business Center

5245 N. Backer Ave

Fresno, CA 93740

To review the NOP, to make written comments, or to receive more information about the EIR process, please visit: www.cdfa.ca.gov/go/peir.

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nprnews2003@yahoo.com
nrodriguez@univision.net
nsteward@cagrocers.com
ntn24california@gmail.com
nytcali@gmail.com
nytcali@gmail.com
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post@goowy.com
postmaster@kpfa.org
press@socalnews.com
producers@abc-sf.com
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yvette@santacruzcountyfair.com
zbenedict@avocado.org
zengyh@yahoo.com

Appendix D
INVITATION TO PARTICIPATE

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APPENDIX D - INVITATION TO PARTICIPATE

The following email language was sent to various counties and cities as an invitation to participate in the CEQA process for the Statewide Plant Pest Prevention and Management Program:

Dear Mayor and City Council Members,

Dear Chairperson and Supervisors,

The California Department of Food and Agriculture is in the early stages of preparing a Statewide Plant Pest Prevention and Management Program Environmental Impact Report, as required under CEQA.

On June 23, we issued our Notice of Preparation (NOP), the first stage in a two-and-a-half year public process that will provide transparency about department programs and decision-making utilizing the principles of integrated pest management. It is important to note that the NOP is not a permit to do anything. Rather, it is the first step in a thorough environmental analysis of CDFA's pest management programs conducted with input from the public and other stakeholders. .

We hope you will participate in the process. To sign up for our listserv and receive all information, please go to <http://www.cdfa.ca.gov/listserv/> . Scoping sessions for the EIR are scheduled to begin July 6. Comments are due to CDFA on or before Monday, July 25, 2011. We ask that you please review the attached materials and we hope to have you join us in the process to develop the EIR over the next two-and-a-half years.

Best Regards,

Dr. Robert Leavitt

Director Plant Health and Pest Prevention Services

California Department of Food and Agriculture

In addition, the email included the following attachments:

- Press Release (*refer to Appendix C*)
- Frequently Asked Questions (*refer to Appendix F*)
- NOP (*refer to Appendix A*)

Cities and Counties Which Received an Invitation to Participate by CDFA

Counties	Sent On
Alameda	6/30/2011
Contra Costa	7/21/2011
Fresno	7/21/2011
Kern	7/21/2011
LA County	7/21/2011
Marin	6/30/2011
Monterey	6/30/2011
Orange	7/21/2011
Riverside	7/21/2011
San Bernardino	7/21/2011
San Diego	7/21/2011
San Francisco	6/30/2011
San Joaquin	7/21/2011
San Mateo	7/21/2011
Santa Cruz	6/30/2011
Sonoma	7/21/2011
Stanislaus	7/21/2011
Ventura	7/21/2011
Cities	
Alameda	6/30/2011
Albany	6/30/2011
Anaheim	7/22/2011
Bakersfield	7/21/2011
Belvedere	6/30/2011
Berkeley	6/30/2011
Capitola	6/30/2011
Carmel-By-The-Sea	6/30/2011
Chula Vista	7/21/2011
Concord	7/21/2011
Corona	7/21/2011
Corte Madera	6/30/2011
Del Ray Oaks	6/30/2011
Dublin	6/30/2011
Elk Grove	7/21/2011
Emeryville	6/30/2011
Fairfax	6/30/2011
Fontana	7/21/2011
Fremont	6/30/2011
Fremont	7/21/2011
Fresno	7/22/2011
Fullerton	7/21/2011
Garden Grove	7/21/2011
Glendale	7/21/2011

Gonzales	6/30/2011
Greenfield	6/30/2011
Hayward	6/30/2011
Hayward	7/21/2011
Huntington Beach	7/21/2011
Irvine	7/21/2011
King City	6/30/2011
Lancaster	7/21/2011
Larkspur	6/30/2011
Livermore	6/30/2011
Long Beach	7/21/2011
Los Angeles	7/21/2011
Marina	6/30/2011
Mill Valley	6/30/2011
Modesto	7/21/2011
Monterey	6/30/2011
Moreno Valley	7/21/2011
Newark	6/30/2011
Novato	6/30/2011
Oakland	6/30/2011
Oakland	7/21/2011
Oceanside	7/21/2011
Ontario	7/22/2011
Orange	7/21/2011
Oxnard	7/21/2011
Pacific Grove	6/30/2011
Palmdale	7/21/2011
Pasadena	7/21/2011
Piedmont	6/30/2011
Rancho Cucamonga	7/21/2011
Riverside	7/21/2011
Roseville	7/21/2011
Ross	6/30/2011
Sacramento	7/21/2011
Salinas	6/30/2011
Salinas	7/21/2011
San Angelo	6/30/2011
San Diego	7/21/2011
San Francisco	6/30/2011
San Francisco	7/21/2011
San Jose	7/21/2011
San Leandro	6/30/2011
San Rafael	6/30/2011
Sand City	6/30/2011
Santa Ana	7/21/2011
Santa Clara	7/21/2011
Santa Clarita	7/21/2011
Santa Cruz	6/30/2011

Santa Rosa	7/21/2011
Scotts Valley	6/30/2011
Seaside	6/30/2011
Simi Valley	7/21/2011
Soledad	6/30/2011
Stockton	7/22/2011
Sunnyvale	7/21/2011
Thousand Oaks	7/21/2011
Tiburon	6/30/2011
Torrance	7/21/2011
Vallejo	7/21/2011
Victorville	7/21/2011
Visalia	7/21/2011
Watsonville	6/30/2011

Appendix E
SCOPING MEETING NEWSPAPER AD

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*Join us for a public
information and scoping meeting*
on the

**Statewide Plant Pest Prevention and
Management Program**

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

There will be five meetings, as follows:

Wednesday July 6th ♦ 5:30 p.m.

**Chico Municipal Center
421 Main Street
Chico, CA 95928**

Thursday July 7th ♦ 5:30 p.m.

**Sacramento Department of Health Care Services and
Department of Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814**

Tuesday July 12th ♦ 5:30 p.m.

**Irvine Ranch Water District's Duck Club
3512 Michelson Drive
Irvine, CA 92618**

Wednesday July 13th ♦ 5:30 p.m.

**San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102**

Thursday July 14th ♦ 5:30 p.m.

**UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740**

Website: <http://www.cdfa.ca.gov/phpps/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.

(2015.5 C.C.P.)

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County of Yolo

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and a resident of the county aforesaid.
I am over the age of eighteen years
and not a party to or interested
in the above-entitled matter.
I am the principal clerk of the
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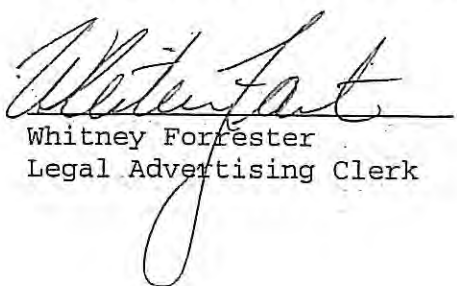
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315 G STREET

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June 23
All in the year(s) 2011

I certify (or declare) under penalty
of perjury that the foregoing
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This 23rd day of June. 2011


Whitney Forrester
Legal Advertising Clerk

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**Public
Notices**

**Public
Notices**

Join us for a public
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On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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Chico, CA 95928

Thursday July 7th, 5:30 p.m.
Department of Health Care Services and
Department of Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814
Webinar available- to participate by
webinar please signup at:
<https://www2.gotomeeting.com/register/926803362>

Tuesday July 12th, 5:30 p.m.
Irvine Ranch Water District's Duck Club
3512 Michelson Drive
Irvine, CA 92618

Wednesday July 13th, 5:30 p.m.
San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102

Thursday July 14th, 5:30 p.m.
UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdfa.ca.gov/go/peir>

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ALL IN YEAR 2011

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Join us for a public
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Statewide Plant Pest
Prevention and
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On June 23rd 2011, the
California Department of
Food and Agriculture (CDFA)
filed a Notice of Preparation
of a program Environmental
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There will be five meetings,
as follows:

Wednesday July 6th ♦
5:30 p.m.

Clitco Municipal Center
421 Main Street
Clitco, CA 95928

Thursday July 7th ♦
5:30 p.m.

Department of Health Care
Services and
Department of Public
Health Building
1500 Capitol Avenue
Sacramento, CA 95814
Webinar available - to
participate via the
webinar, please sign up at:
<https://www2.cdofmeeting.com/register/926803362>

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Irvine Ranch Water
District's Duck Club
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UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website:
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Thursday July 14th • 5:30 p.m.

**UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740**

Website: <http://www.cdfa.ca.gov/go/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.

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Jn26

CALIFORNIA DEPT. OF FOOD &

AGRICULTURE

1220 "N" ST., STE 221

SACRAMENTO, CA 95814

PROOF OF PUBLICATION

COUNTY OF FRESNO STATE OF CALIFORNIA

EXHIBIT A.

PUBLIC NOTICE

#49059

Join us for a public
information and scoping meeting
on the
Statewide Plant Pest Prevention
and Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

There will be five meetings, as follows:

Wednesday July 6th 5:30 p.m.

Chico Municipal Center
421 Main Street
Chico, CA 95928

Thursday July 7th 5:30 p.m.

Department of
Health Care Services
and
Department of
Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate
via the webinar, please sign up at:
<https://www2.calomeeting.com/register/926803362>

Tuesday July 12th 5:30 p.m.

Irvine Ranch Water District's
Duck Club
3512 Michelson Drive
Irvine, CA 92618

Wednesday July 13th 5:30 p.m.

San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102

Thursday July 14th 5:30 p.m.

UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website:

<http://www.cdfa.ca.gov/go/pelr>

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(PUB: June 27, 2011)

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 22, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

06-27-2011

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated JUNE 27, 2011

**THE RECORD
PROOF OF PUBLICATION**

STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

THE UNDERSIGNED SAYS:

I am a citizen of the United States and a resident of San Joaquin County; I am over the age of 18 years and not a part to or interested in the above-entitled matter. I am the principal clerk of the printer of THE RECORD, a newspaper of general publication, printed and published daily in the City of Stockton, County of San Joaquin by the Superior Court of the County of San Joaquin, State of California, under the date of February 26, 1952, File No. 52857, San Joaquin County Records; that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published each regular and entire issue of said newspaper and not in any supplement thereof on the following dates,
To wit, June 28 2011

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 28, 2011 In Stockton California



Carlette Schnell,
The Record

0000874423

*Join us for a public
information and scoping meeting
on the*

Statewide Plant Pest Prevention and Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR. There will be five meetings, as follows:

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Department of Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate via the webinar, please sign up at:
<https://www2.gotomeeting.com/register/926803362>

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UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdffa.ca.gov/go/peir>

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#874423 6/28/2011

San Jose Mercury News

750 RIDDER PARK DRIVE
SAN JOSE, CALIFORNIA 95190
408-920-5332

PROOF OF PUBLICATION

IN THE
CITY OF SAN JOSE
STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

Plant Health and Pest Prevention Service
1220 N Street Rm 221
Sacramento CA 95814

FILE NO. A.Espinoza

In the matter of

The San Jose Mercury News

The undersigned, being first duly sworn, deposes and says: That at all times hereinafter mentioned affiant was and still is a citizen of the United States, over the age of eighteen years, and not a party to or interested in the above entitled proceedings; and was at and during all said times and still is the principal clerk of the printer and publisher of the San Jose Mercury News, a newspaper of general circulation printed and published daily in the city of San Jose in said County of Santa Clara, State of California as determined by the court's decree dated June 27, 1952, case numbers 84096 and 84097, and that said San Jose Mercury News is and was at all times herein mentioned a newspaper of general circulation as that term is defined by Sections 6000 and following, of the Government Code of the State of California and, as provided by said sections, is published for the dissemination of local or telegraphic news and intelligence of a general character, having a bona fide subscription list of paying subscribers, and is not devoted to the interests or published for the entertainment or instruction of a particular class, professional, trade, calling, race or denomination, or for the entertainment and instruction of any number of such classes, professionals, trades, callings, races or denominations; that at all times said newspaper has been established, printed and published in the said city of San Jose in said County and State at regular intervals for more than one year preceding the first publication of the notice herein mentioned. Said decree has not been revoked, vacated or set aside.


I declare that the notice, of which the annexed is a true printed copy, has been published in each regular or entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

6/27/2011

Dated at San Jose, California
06/27/11

I declare under penalty of perjury that the foregoing is true and correct.

Signed



Principal clerk of the printer and publisher of the San Jose Mercury News.

Legal No.

0004054904

Join us for a public
information and scoping
meeting
on the
Statewide Plant Pest
Prevention and
Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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Care Services and
Department of Public
Health Building
1500 Capitol Avenue
Sacramento, CA 95814
Webinar available - to
participate via the
webinar, please sign up
at:
<https://www2.gotomeet.com/register/926803362>

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Irvine Ranch Water
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100 Larkin Street
San Francisco, CA 94102

Thursday July 14th
* 5:30 p.m.

UC Fresno
Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website:
<http://www.cdffa.ca.gov/go/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.

SJMN#4054904
June 27, 2011

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA, County of San Bernardino

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the publisher of the DESERT DISPATCH, a newspaper of general circulation, published in the City of Barstow, County of San Bernardino, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, under the date of February 27, 1996, Case Number BVC 02359, that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

June 24

All in the year 2011.

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated this: 24th day of June, 2011.

Signature

Leslie Jacobs

This space is the County Clerk's Filing Stamp

Proof of Publication of

JOIN US FOR A PUBLIC INFORMATION AND SCOPING MEETING ON THE STATEWIDE PLANT PEST PREVENTION AND MANAGEMENT PROGRAM

Join us for a public information and scoping meeting on the Statewide Plant Pest Prevention and Management Program

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Website:
<http://www.cdфа.ca.gov/go/pelr>

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Published in the
Desert Dispatch
June 24, 2011
(F-151)

P.O. Box 120191, San Diego, CA 92112-0191

AFFIDAVIT OF PUBLICATION

CA DEPT. OF FOOD & AGRICULTURE
PLANT HEALTH & PEST PREVENTION SERVICES
1220 N ST, STE 221
ATTN: AUSTIN J. WEBSTER
SACRAMENTO, CA 95814

STATE OF CALIFORNIA } ss.
County of San Diego }

The Undersigned, declares under penalty of perjury under the laws of the State of California: That she is a resident of the County of San Diego. That she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that she is not a party to, nor interested in the above entitled matter; that she is Chief Clerk for the publisher of

The San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Jun 24, 2011


Chief Clerk for the Publisher

6-27-2011
Date

Affidavit of Publication of

Legal Advertisement
Ad # 0010526102
ORDERED BY: AUSTIN WEBSTER

PUBLIC NOTICE

Join us for a public information and scoping meeting on the Statewide Plant Pest Prevention and Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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1500 Capitol Avenue
Sacramento, CA 95814

Webinar available -- to participate via the webinar, please sign up at:
<https://www2.gotommeeting.com/register/926803362>

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5245 N. Backer Avenue
Fresno, CA 93740

Website:
<http://www.cdffa.ca.gov/90/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.

Certificate of Publication

Ad #280436

In Matter of Publication of:

Public Notice

State of California)

))§

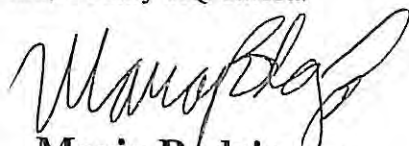
County of Ventura)

I, **Maria Rodriguez**, hereby certify that the **Ventura County Star Newspaper** has been adjudged a newspaper of general circulation by the Superior Court of California, County of Ventura within the provisions of the Government Code of the State of California, printed in the City of Camarillo, for the County of Ventura, State of California; that I am a clerk of the printer of said paper; that the annexed clipping is a true printed copy and publishing in said newspaper on the following dates to wit:

June 28, 2011

I, Maria Rodriguez certify under penalty of perjury, that the foregoing is true and correct.

Dated this June 28, 2011, in Camarillo, California, County of Ventura.


Maria Rodriguez
(Signature)

Join us for a public
information and scoping meeting
on the
**Statewide Plant Pest Prevention and
Management Program**

On June 23rd 2011, the California Department of Food
and Agriculture (CDFA) filed a Notice of Preparation of a
program Environmental Impact Report (EIR) for the
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Webinar available - to participate via the webinar,
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5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdfa.ca.gov/go/peir>

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and/or participate in this event? If so, please contact
CDFA at (916) 654-0317. Auxiliary aides and services
are available to individuals with disabilities upon request.
Publish: June 28, 2011 Ad No.280436

SPACE FOR COURT CLERK'S FILING STAMP

Proof of Publication

(2015.5 C.C.P.)

STATE OF CALIFORNIA]

SS

COUNTY OF SANTA CRUZ]

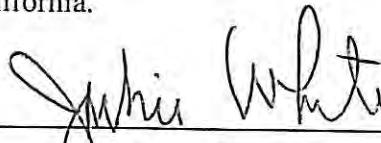
Public Notice

I, THE UNDERSIGNED, DECLARE:

That I am over the age of eighteen and not interested in the herein-referenced matter; that I am now, and at all times embraced in the publication herein mentioned was, a principal employee of the printer of the Santa Cruz Sentinel, a daily newspaper printed, published and circulated in the said county and adjudged a newspaper of general circulation by the Superior Court of California in and for the County of Santa Cruz, under Proceeding No. 25794; that the advertisement (of which the annexed is a true printed copy) was published in the above-named newspaper on the following dates, to wit: **June 28, 2011**

I DECLARE under penalty of perjury that, the foregoing is true and correct to the best of my knowledge.

This **28th day of June, 2011**, at Santa Cruz, California.



JACKIE WHITE

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information and scoping meeting
on the
Statewide Plant Pest Prevention and
Management Program

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Website: <http://www.cdfa.ca.gov/go/peir>

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individuals with disabilities upon request.
6/28 4058954

THE Newspaper of the Central Coast TRIBUNE

3825 South Higuera • Post Office Box 112 • San Luis Obispo, California 93406-0112 • (805) 781-7800

In The Superior Court of The State of California
In and for the County of San Luis Obispo
AFFIDAVIT OF PUBLICATION

AD #6947353
PLANT HEALTH & PEST
PREVENTION SERVICES

STATE OF CALIFORNIA

ss.

County of San Luis Obispo

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen and not interested in the above entitled matter; I am now, and at all times embraced in the publication herein mentioned was, the principal clerk of the printers and publishers of THE TRIBUNE, a newspaper of general Circulation, printed and published daily at the City of San Luis Obispo in the above named county and state; that notice at which the annexed clippings is a true copy, was published in the above-named newspaper and not in any supplement thereof – on the following dates to wit; JUNE 27, 2011 that said newspaper was duly and regularly ascertained and established a newspaper of general circulation by Decree entered in the Superior Court of San Luis Obispo County, State of California, on June 9, 1952, Case #19139 under the Government Code of the State of California.

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Jane E. Durand
(Signature of Principal Clerk)

DATED: JUNE 27, 2011
AD COST: \$208.00

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**Statewide Plant Pest Prevention and
Management Program**

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Sacramento, CA 95814
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June 27, 2011

6947353

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Solano

I am a citizen of the United States and a resident of Solano County. I am over the age of eighteen years and not a party to, or interested in, this Legal or Public Notice matter. I am the principal Legal Advertising Clerk for the

DAILY REPUBLIC
1250 Texas Street
P.O. Box 47
Fairfield, CA 94533

a newspaper of general circulation printed and published mornings, daily and Sunday, in the City of Fairfield, County of Solano, which has been adjudged a newspaper of general circulation by the Superior Court of the County of Solano, State of California, Case Number 25875, on June 30, 1952.

I certify under penalty of perjury that the attached Legal or Public Notice has been published in each regular and entire issue of the Daily Republic, and not in any supplement, on the following date(s):

June 24

in the year: 2011

By: Annette Parker

Annette Parker, Legal Advertising Clerk

Date: 6-28-11

This Space For Filing Stamp

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Fresno, CA 93740

Website: <http://www.cdffa.ca.gov/go/palr>

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DR#26539375

Published: June 24, 2011

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA,)
) ss.
County of Orange)

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of **The Orange County Register**, a newspaper of general circulation, published in the city of Santa Ana, County of Orange, and which newspaper has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, under the date of 1/18/52, Case No. A-21046, that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

June 27, 2011

"I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct":

Executed at Santa Ana, Orange County, California, on

Date: June 27, 2011


Signature

The Orange County Register
625 N. Grand Ave.
Santa Ana, CA 92701
(714) 796-7000 ext. 2209

PROOF OF PUBLICATION

Proof of Publication of

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information and scoping meeting
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5245 N. Backer Avenue
Fresno, CA 93740**

Website: <http://www.cdffa.ca.gov/go/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.

Publish: Orange County Register June 27, 2011 R-1075

PROOF OF PUBLICATION

(2015.5 C.C.P.)

STATE OF CALIFORNIA County of Riverside

I am a citizen of the United States and a resident of the County aforesaid. I am over the age of eighteen years, and not a party to, or interested in the above entitled matter. I am an authorized representative of

THE CALIFORNIAN

An Edition of the North County Times

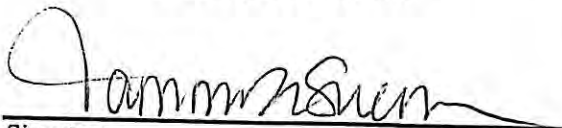
a newspaper of general circulation, published DAILY in the City of Temecula, California, 92590, County of Riverside, Three Lake Judicial District, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under the date of February 26, 1991, Case Number 209105; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof, on the following dates, to wit:

June 29 2011

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at TEMECULA, CALIFORNIA, this

29th day of June, 2011



Signature

Tammi E. Swenson
Legal Advertising Representative

Title

PUBLIC INFORMATION & SCOPING MEETING California Department of Food & Agriculture

Join us for a public information
and scoping meeting
on the
Statewide Plant Pest Prevention
and Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

There will be five meetings, as follows:

Wednesday July 6th ♦ 5:30 p.m.

Chico Municipal Center
421 Main Street Chico, CA 95928

Thursday July 7th ♦ 5:30 p.m.

Department of Health Care
Services and Department of Public
Health Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate
via the webinar, please sign up at:

[https://www2.gotomeeting.com/
register/926803362](https://www2.gotomeeting.com/register/926803362)

Tuesday July 12th ♦ 5:30 p.m.

Irvine Ranch Water District's
Duck Club
3512 Michelson Drive
Irvine, CA 92618

Wednesday July 13th ♦ 5:30p.m.

San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102

Thursday July 14th ♦ 5:30 p.m.

UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdfe.ca.gov/gotpeir>
Will you need an accommodation in
order to attend and/or participate in
this event? If so, please contact
CDFA at, 916-654-0317. Auxiliary
aides and services are available to
individuals with disabilities upon
request.
nct 2294149 • 06/29/2011

This space is for the County Clerk's Filing Stamp

PROOF OF PUBLICATION (2010 & 2011 C.C.P.)

STATE OF CALIFORNIA
County of San Diego

I am a citizen of the United States and a resident of the County aforesaid: I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of

North County Times

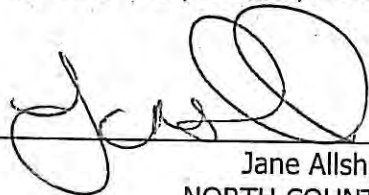
Formerly known as the Blade-Citizen and The Times-Advocate and which newspapers have been adjudicated newspapers of general circulation by the Superior Court of the County of San Diego, State of California, for the City of Oceanside and the City of Escondido, Court Decree number 171349, for the County of San Diego, that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

June 29th 2011

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at **Escondido**, California

On this 29th, day of June, 2011



Jane Allshouse
NORTH COUNTY TIMES
Legal Advertising

Proof of Publication of

Join us for a public information
and scoping meeting
on the
Statewide Plant Pest Prevention
and Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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Sacramento, CA 95814

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San Francisco, CA 94102

Thursday July 14th ♦ 5:30 p.m.

UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdfr.ca.gov/go/pelr>
Will you need an accommodation in
order to attend and/or participate in
this event? If so, please contact
CDFA at 916-654-0317. Auxiliary
aides and services are available to
individuals with disabilities upon
request.
ncl 2294149 • 06/29/2011

STATE OF CALIFORNIA)) ss.
COUNTY OF ORANGE)

Signature

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.
Published Daily Pilot June 24, 2011

Affidavit of Publication

STATE OF CALIFORNIA, COUNTY OF DEL NORTE

I, **Debra Brown**, a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not party to or interested in the above-entitled matter. I am the principal clerk of the printer of

The Triplicate

a daily newspaper of general circulation, printed and published in the City of Crescent City, County of Del Norte, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Del Norte, State of California, under the date of March 21, 1952, case number 7594; that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published and not in any supplement thereof on the following dates, to-wit:

Acct Name: CA DEPT. OF FOOD & AGRICULTURE

Legal Description: Join us for a public
information and scoping meeting
on the
Statewide Plant Pest Prevention and

06/24/2011

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Crescent City, California, this 24 day of June, 2011.

Debra Brown
Signature

Join us for a public
information and scoping meeting
on the
Statewide Plant Pest Prevention and
Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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Department of Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate via the webinar,
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<https://www2.gotomeeting.com/register/926803362>

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3512 Michelson Drive
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100 Larkin Street
San Francisco, CA 94102

Thursday July 14th " 5:30 p.m.

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5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdca.ca.gov/go/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.
Published: June 24, 2011

AFFIDAVIT OF PUBLICATION

Filed _____

By _____

From the Office of

Attorney for _____

In the Superior Court of the State of California
in and for the County of Shasta

CERTIFICATE OF PUBLICATION
RECORD SEARCHLIGHT

DEPT OF FOOD & AGRICULTURE
1220 NORTH ST RM A130
SACRAMENTO CA 95814

REFERENCE: 00611569 AUSTIN WEBST
6744574 JOIN US FOR A PUBLIC

State of California
County of Shasta

I hereby certify that the Record Searchlight is a newspaper of general circulation within the provisions of the Government Code of the State of California, printed and published in the City of Redding, County of Shasta, State of California; that I am the principal clerk of the printer of said newspaper; that the notice of which the annexed clipping is a true printed copy was published in said newspaper on the following dates, to wit;

PUBLISHED ON: 06/28

FILED ON: 06/28/11

I certify under penalty of perjury that the foregoing is true and correct,
at Redding, California on the above date.

B. Carter

RECORD SEARCHLIGHT
1101 Twin View Blvd, Redding, CA 96003

Join us for a public
information and scoping meeting
on the
Statewide Plant Pest Prevention and
Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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Chico, CA 95928

Thursday July 7th ' 5:30 p.m.

Department of Health Care Services and
Department of Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate via the webinar,
please sign up at:
<https://www2.gotomeeting.com/register/926803362>

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Wednesday July 13th ' 5:30 p.m.

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San Francisco, CA 94102

Thursday July 14th ' 5:30 p.m.

UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdffa.ca.gov/go/pelr>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon request.

June 28, 2011

6744574

Ukiah Daily Journal

590 S. School St
PO Box 749
Ukiah, California 95482
(707) 468-3500
udjlegals@pacific.net

Plant Health and Pest Prevention Service
1220 N Street Rm 221
Sacramento CA 95814

PROOF OF PUBLICATION (2015.5 C.C.P.)

STATE OF CALIFORNIA COUNTY OF MENDOCINO

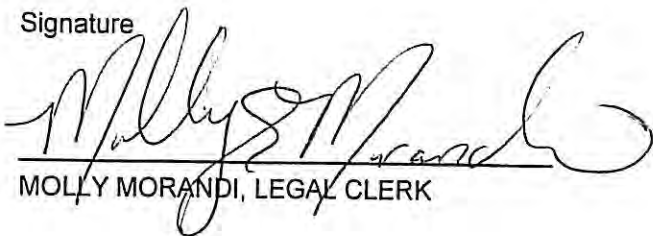
I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the Ukiah Daily Journal, a newspaper of general circulation, printed and published daily in the City of Ukiah, County of Mendocino and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Mendocino, State of California, under the date of September 22, 1952, Case Number 9267; that the notice, of which the annexed is a printed copy (set in type not smaller than non-pareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

6/24/2011

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Ukiah, California,
June 24th, 2011

Signature



MOLLY MORANDI, LEGAL CLERK

Legal No. 0004054854

494-11

6-24/11

Join us for a public information and scoping meeting on the STATEWIDE PLANT PEST PREVENTION AND MANAGEMENT PROGRAM

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

There will be five meetings, as follows:

Wednesday July 6th 5:30 p.m.

Chico Municipal Center
421 Main Street
Chico, CA 95928

Thursday July 7th 5:30 p.m.

Department of Health Care
Services and
Department of Public Health
Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate via the webinar, please sign up at:
<https://www2.gotomeeting.com/register/926803362>

Tuesday July 12th 5:30 p.m.

Irvine Ranch Water District's
Duck Club
3512 Michelson Drive
Irvine, CA 92618

Wednesday July 13th 5:30 p.m.

San Francisco Public Library
100 Larkin Street
San Francisco, CA 94102

Thursday July 14th 5:30 p.m.

UC Fresno Business Center
5245 N. Backer Avenue
Fresno, CA 93740

Website:

<http://www.cdfa.ca.gov/go/peir>

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact CDFA at (916) 654-0317. Auxiliary aides and services are available to individuals with disabilities upon re-

I quest.

RECORDING/FILING REQUESTED BY AND MAIL TO:
California Dept of Food & Agriculture
Plant Health & Pest Prevention Svcs
1220 N Street
Sacramento, CA 95814

PROOF OF PUBLICATION
(California Code of Civil Procedure 2010, 2015.5)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the
aforesaid County. I am over the age of eighteen years (18)
years, and not a party to or interested in the above-entitled
matter. I am the Principal Clerk of the printer of the
LOS ANGELES TIMES, a newspaper of general
circulation, printed and published DAILY in the City
of Los Angeles, County of Los Angeles and which
newspaper was adjudged a newspaper of general circulation by
the Superior Court of the County of Los Angeles, State of California,
under the date of April 28, 1952, Case Number 598599.

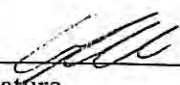
The notice, a true and correct copy of which is annexed, has been
published in each regular and entire issue of said newspaper on the
following dates, to wit:

THURSDAY; JUNE 30, 2011

I certify (or declare) under penalty of perjury under the laws of the State of California
that the foregoing is true and correct.

Dated at Los Angeles, California,

This 30th day of JUNE 2011


Signature

Angelina de Cordova

Join us for a public
information and scoping
meeting

on the

Statewide Plant Pest
Prevention and
Management Program

On June 23rd 2011, the
California Department of
Food and Agriculture
(CDFA) filed a Notice of
Preparation of a program
Environmental Impact
Report (EIR) for the
Statewide Plant Pest
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The purpose of these
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Thursday July 7th • 5:30
p.m.

Department of Health
Care Services and
Department of Public
Health Building
1500 Capitol Avenue
Sacramento, CA 95814
Webinar available - to
participate via the
webinar, please sign up at:
<http://www2.cdofmeeting.com/register/928803362>

Tuesday July 12th • 5:30
p.m.

Irvine Ranch Water
District's Duck Club
3512 Michelson Drive
Irvine, CA 92618

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5:30 p.m.

San Francisco Public
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San Francisco, CA 94102

Thursday July 14th • 5:30
p.m.

UC Fresno Business
Center
5245 N. Backer Avenue
Fresno, CA 93740

Website: <http://www.cdof.ca.gov/go/pelr>

Will you need an
accommodation in order to
attend and/or participate
in this event? If so, please
contact CDFA at (916)
654-0317. Auxiliary aides
and services are available
to individuals with
disabilities upon request.

DECLARATION OF PUBLICATION OF SAN FRANCISCO CHRONICLE

Lori Gomez

Declares that:

The annexed advertisement has been regularly published
In the

SAN FRANCISCO CHRONICLE

Which is an was at all times herein mentioned
established as newspaper of general circulation in the
City and County of San Francisco, State of California, as
the term is defined by Section 6000 of the Government
Code

SAN FRANCISCO CHRONICLE

(Name of Newspaper)

901 Mission Street

San Francisco, CA 94103

From

To

Namely on

(Dates of Publication)

I declare under penalty of perjury that the foregoing is
true and correct.

Executed on

At San Francisco, California

PUBLIC NOTICES

Join us for a public
information and scoping meeting
on the
Statewide Plant Pest Prevention and
Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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and
Department of Public Health Building
1500 Capitol Avenue
Sacramento, CA 95814

Webinar available - to participate via
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Fresno, CA 93740

Website:
<http://www.cdffa.ca.gov/go/peir>

Will you need an accommodation in
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services are available to individuals
with disabilities upon request.

The Sacramento Bee

P.O. Box 15779 • 2100 Q Street • Sacramento, CA 95852

CA DEPT OF FOOD & AG
1220 N STREET #315
SACRAMENTO, CA 95814

DECLARATION OF PUBLICATION
(C.C.P. 2015.5)

COUNTY OF SACRAMENTO
STATE OF CALIFORNIA

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the printer and principal clerk of the publisher of The Sacramento Bee, printed and published in the City of Sacramento, County of Sacramento, State of California, daily, for which said newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Sacramento, State of California, under the date of September 26, 1994, Action No. 379071; that the notice of which the annexed is a printed copy, has been published in each issue thereof and not in any supplement thereof on the following dates, to wit:

June 24, 2011

I certify (or declare) under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Sacramento, California, on **June 24, 2011.**



(Signature)

NO 511 PUBLIC NOTICE

Join us for a public
information and scoping meeting
on the

Statewide Plant Pest Prevention and Management Program

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Services and Department of
Public Health Building
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Website:
<http://www.cdffa.ca.gov/go/pelr>

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Chico Enterprise-Record

400 E. Park Ave.
Chico, Ca 95928
530-896-7702
erlegal@chicoer.com

CALIFORNIA DEPT OF FOOD
1220 N Street Room 315
Sacramento CA 95814

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, IN AND FOR THE COUNTY OF BUTTE

In The Matter Of
SCOPING MEETING.

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA }
COUNTY OF BUTTE } SS.

The undersigned resident of the county of Butte, State of California, says:

That I am, and at all times herein mentioned was a citizen of the United States and not a party to nor interested in the above entitled matter; that I am the principal clerk of the printer and publisher of

**The Chico Enterprise-Record
The Oroville Mercury-Register**

That said newspaper is one of general circulation as defined by Section 6000 Government Code of the State of California, Case No. 26796 by the Superior Court of the State of California, in and for the County of Butte; that said newspaper at all times herein mentioned was printed and published daily in the City of Chico and County of Butte; that the notice of which the annexed is a true printed copy, was published in said newspaper on the following days:

6/29/2011

Dated July 01, 2011
at Chico, California

Donna Tyrrell

(Signature)

Legal No. 0004062746

Join us for a public information and scoping meeting on the Statewide Plant Pest Prevention and Management Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

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Department of Public Health Building
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Publish: 6/29/11

The Times-Standard

PO Box 3580
Eureka, CA 95502
707-441-0571
legals@times-standard.com

Cali Dept of Food & Ag
1220 N St., Suite 221, ATTN: David Pegos
Sacramento CA 95814

PROOF OF PUBLICATION (2015.5 C.C.P.)

STATE OF CALIFORNIA County of Humboldt

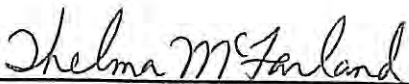
I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-mentioned matter. I am the principal clerk of the printer of THE TIMES-STANDARD, a newspaper of general circulation, printed and published daily in the City of Eureka, County of Humboldt, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Humboldt, State of California, under the date of June 15, 1967, Consolidated Case Numbers 27009 and 27010; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit,

6/23/2011

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Eureka, California,
This 11th day of July, 2011

Signature



This space is for the County Clerk's Filing Stamp

Legal No.

0004053619

Join us for a public
information and
scoping meeting
on the
Statewide Plant
Pest Prevention
and Management
Program

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Department of
Health Care
Services and
Department of
Public Health
Building
1500 Capitol
Avenue
Sacramento, CA
95814

Webinar available
- to participate via
the webinar,
please sign up at:
<https://www2.gotomeeting.com/register/926803362>

Tuesday July 12th
• 5:30 p.m.

Irvine Ranch Water
District's Duck
Club
3512 Michelson
Drive
Irvine, CA 92618

Wednesday July
13th • 5:30 p.m.

San Francisco
Public Library
100 Larkin Street
San Francisco, CA
94102

Thursday July 14th
• 5:30 p.m.

UC Fresno Business
Center
5245 N. Backer
Avenue
Fresno, CA 93740

Website:
<http://www.cdffa.ca.gov/go/pelr>

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so, please contact
CDFA at (916) 654-
0317. Auxiliary
aides and services
are available to in-
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abilities upon re-
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6/23

The Humboldt Beacon

PO Box 3580
Eureka, CA 95502
707-441-0571
legals@times-standard.com

Cali Dept of Food & Ag
1220 N St., Suite 221, ATTN: David Pegos
Sacramento CA 95814

PROOF OF PUBLICATION (2015.5 C.C.P.)

STATE OF CALIFORNIA County of Humboldt

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-mentioned matter. I am the principal clerk of the printer and publisher of The Humboldt Beacon, a newspaper of general circulation, printed and published weekly in the City of Fortuna, County of Humboldt, and which newspaper has been adjudged a newspaper of general circulation as defined by the laws of the State of California by the Superior Court of the County of Humboldt, State of California, under the date of July 11, 1952, Case Number 27011. That the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit,

06/30/2011

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Fortuna, California,
July 11th, 2011

Signature



This space is for the County Clerk's Filing Stamp

Legal No.

0004053619

Join us for a public
information and
scoping meeting
on the
Statewide Plant
Pest Prevention
and Management
Program

On June 23rd 2011, the California Department of Food and Agriculture (CDFA) filed a Notice of Preparation of a program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program. The purpose of these scoping meetings is to solicit input on the range of actions, alternatives, significant environmental effects and mitigations to be discussed in the draft EIR.

There will be five meetings, as follows:

Wednesday July
6th • 5:30 p.m.

Chico Municipal
Center
421 Main Street
Chico, CA 95928

Thursday July 7th
• 5:30 p.m.

Department of
Health Care
Services and
Department of
Public Health
Building
1500 Capitol
Avenue
Sacramento, CA
95814
Webinar available
- to participate via
the webinar,
please sign up at:
<https://www2.gotomeeting.com/register/926803362>

Tuesday July 12th
• 5:30 p.m.

Irvine Ranch Wa-
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3512 Michelson
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UC Fresno Busi-
ness Center
5245 N. Backer
Avenue
Fresno, CA 93740

Website:
<http://www.cdфа.ca.gov/go/pelr>

Will you need an
accommodation in
order to attend
and/or participate

and/or participate
in this event? If
so, please contact
CDFA at (916) 654-
0317. Auxiliary
aides and services
are available to in-
dividuals with dis-
abilities upon re-
quest.
6/23

Appendix F
SCOPING MEETING MATERIALS

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Statewide Plant Pest Prevention and Management Program

Environmental Impact Report

Goals of the Program EIR

- Facilitate rapid and effective prevention and management of pest infestations statewide
- Provide CEQA compliance for all CDFA pest prevention programs
- Allow for flexibility during project-specific implementation
- Quickly integrate new pest programs and management approaches
- Allow utilization by state and local partners for their own pest management activities
- Complies with AB 2763 (Laird) Ch. 573, Stats. 2008



The California Department of Food and Agriculture is in the internal development stages of an Environmental Impact Report (EIR) for a Statewide Plant Pest Prevention and Management Program. The key objective of this project is to create a vehicle which provides a time-sensitive and efficient framework for evaluating potential environmental impacts of the various plant pest prevention and management programs implemented by CDFA and its partners.

Project Description and Current Status

The Program EIR will focus on management approaches rather than individual pests, analyzing each for their advantages and disadvantages, including alternatives that may result in fewer impacts and necessary mitigation measures.

- Management approaches include: cultural, physical, biological, chemical and regulatory.
- Ensure public safety in all manners of pest treatment
- Comprehensive human health and ecological risk assessment which includes the full range of receptors, including pesticide applicators, agricultural workers, and individuals in non-agricultural areas
- Expand public participation with additional environmental analysis occurring when necessitated by site-specific factors
- Public outreach process has already begun with the development of a website, a phone line, and an email subscription option available at www.cdfa.ca.gov/go/peir under the heading "Program EIR Updates."
- Consultation process has begun with sister agencies
- Fiscal savings through process improvement

Environmental Consultant

CDFA has contracted with Horizon Water and Environment, LLC (Horizon) to lead the project. The Horizon team was specifically assembled to meet the technical, legal, and logistical challenges of the CDFA's Statewide Plant Pest Prevention and Management Program.

The final draft of the Program EIR is expected in December 2012.

CDFA's Program EIR

AB 2763 (Laird) Chapter 573, Statutes of 2008

Assembly Bill 2763 requires the California Department of Food and Agriculture (CDFA) to develop a list of invasive pests and diseases likely to enter the state for which eradication, control, or management action might be appropriate. This bill also requires the CDFA, based on available funding, to develop and maintain a written plan on the most appropriate options for detection, exclusion, eradication, control, or management of high-priority invasive pests.

Actions to date:

February
2009

- **CDFA Establishes the Invasive Species Council of California (ISCC)**

April
2009

- **The California Invasive Species Advisory Committee (CISAC) is appointed** to advise the Council and make recommendations.
- **CISAC develops a list of invasive species** that are threat to state. It can be accessed by clicking on the "living list" link on the CISAC webpage at www.iscc.ca.gov/cisac.
 - CISAC has developed a draft strategic framework for invasive species exclusion, detection, eradication and management.

January
2011

- **CDFA begins the process to develop a comprehensive Environmental Impact Report for it Pest Prevention Program (Program EIR)** to fully comply with the Laird Bill and the California Environmental Quality Act. The Program EIR will analyze environmental impacts and necessary mitigation measures for the prevention and management of invasive plant pests statewide, allow for rapid response to new invasive plant pest detections, and easily amended when new plant pests are detected and new treatment methods become available.

March
2011

- **CDFA begins the public outreach process** for its Statewide Plant Pest Prevention and Management Program EIR. The web page is www.cdfa.ca.gov/go/peir

June
2011

- **Notice of Preparation issued.** Brief notice sent by lead agency (CDFA) to notify state, federal, and local agencies and interested parties of the Statewide Program, and to invite comments on the environmental issues to be addressed in the Program EIR and participation in the larger CEQA process.

Future Actions:

July
2011

- **Scoping meetings:**

CHICO

July 6th, 2011
5:30-7:30 PM
Chico Municipal
Center
421 Main St
Chico, CA 95928

SACRAMENTO*

July 7th, 2011
5:30-7:30 PM
Dept. of Health Care
Services and Dept. of
Public Health building
1500 Capitol Ave.
Sacramento, CA 95814

ORANGE COUNTY

July 12th, 2011
5:30-7:30 PM
Irvine Ranch Water
District's Duck Club
3512 Michelson Dr.
Irvine, CA 92618

SAN FRANCISCO

July 13th, 2011
5:30-7:30 PM
S.F. Public Library
100 Larkin St.
San Francisco, CA
94102

FRESNO

July 14th, 2011
5:30-7:30 PM
UC Fresno Business
Center
5245 N. Backer Ave.
Fresno, CA 93740

*Note – A webinar is available for the Sacramento meeting – to participate via the webinar, please sign up at: <https://www2.gotomeeting.com/register/926803362>

March
2012

- **Release of public review draft Program EIR.**

May
2012

- **Public hearings — 5 across the state.**

February
2013

- **PEIR certification and approval.**

Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR)

FREQUENTLY ASKED QUESTIONS

Q – Why is the EIR being prepared?

A – Insect pests and plant diseases are a constant threat to the nation’s food supply and natural resources. One of CDFA’s primary missions is to prevent these invasive species, such as fruit flies, the European grapevine moth, Sudden Oak Death, and the Asian citrus psyllid and the disease it carries, huanglongbing. The EIR will provide environmental review and analysis of CDFA's various pest prevention and management activities statewide. It would apply to future detections and activities that fall within the scope of the EIR.

Q – A Notice of Preparation (NOP) for the EIR has been issued. What does this mean?

A – The NOP is a document stating that an EIR will be prepared for a particular project. It is the first step in the EIR process. The NOP provides other state agencies that have jurisdiction in the process, called “responsible agencies,” with sufficient information describing the project and the potential environmental effects. Within 30 days after receiving the NOP each responsible agency must provide the lead agency (CDFA) with specific detail about the scope and content of the environmental information related to the responsible agency's area of statutory responsibility. This information must be included in the draft EIR.

Q – What issue challenging California is resulting in this EIR?

A – If pest and plant disease threats cannot be prevented, CDFA works to control and remove them by using principles of integrated pest management, which are defined as managing pests by combining biological approaches and other tools in a way that minimizes economic, health, and environmental risks. Pest management programs are highly complex partnerships involving the USDA, county agricultural commissioners, the agriculture industry, and homeowners when infestations occur in urban areas

Q – What if a pest is detected or a treatment method emerges that is not addressed in the EIR?

A – When necessary, the EIR can be relied upon as the foundation for additional environmental review and be easily amended, including additional comment, when new treatment approaches become available, or current ones become obsolete.

Q – How will sufficient public process be assured, both with the EIR and when the time comes to introduce a new project?

A – There is extensive public participation built into the EIR process and department pest management programs. CDFA intends to exceed requirements for public scoping meetings and public hearings, and will assemble a Technical Advisory Committee to provide feedback to the department. A separate group will be convened to provide peer review of the technical and scientific data relied upon by CDFA in developing alternatives, response measures and risk assessment. The findings of both groups will be made public. Also, there will be additional opportunities for public input and local community engagement once a management approach is selected. People wishing to participate in the process may learn more by visiting www.cdfa.ca.gov/go/peir.

Q – Why does CDFA wish to complete a single EIR with a broad application instead of separate EIRs for each new detection?

A – This approach provides for efficiency and a comprehensive view of an agency's proposed project. In this instance, because invasive pests affect the entire state, CDFA believes it is in the public's interest to get a big picture view of pest management. The department's foremost goal is to ensure public safety in all manners of pest management, but also to:

- Educate about the principles of integrated pest management utilized in programs.
- Provide for the security of California's food supply, which is relied upon across the country and throughout the world.
- Protect the state's natural resources invasive pests.
- Enable CDFA to meet its statutory mandates rapidly.
- Expand public participation in the process.

Q – How long will the EIR take to prepare?

A – Completion is projected in 2013.

Draft EIR- CEQA Scoping Comment Form

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Questions? Please email us or visit our website: www.cdfa.ca.gov/go/peir

Place
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California Department of Food and Agriculture
Attn: Michele Dias, Acting Chief Counsel
Statewide Program Comments
1220 N Street, Suite 400
Sacramento, CA 95814

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Appendix G
SCOPING MEETING POSTERS

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WELCOME TO

**THE CALIFORNIA
DEPARTMENT OF
FOOD AND AGRICULTURE**

**STATEWIDE PLANT PEST PREVENTION
AND MANAGEMENT PROGRAM**

EIR SCOPING MEETING



CALIFORNIA DEPARTMENT OF
FOOD AND AGRICULTURE

SIGN-IN/ORIENTATION

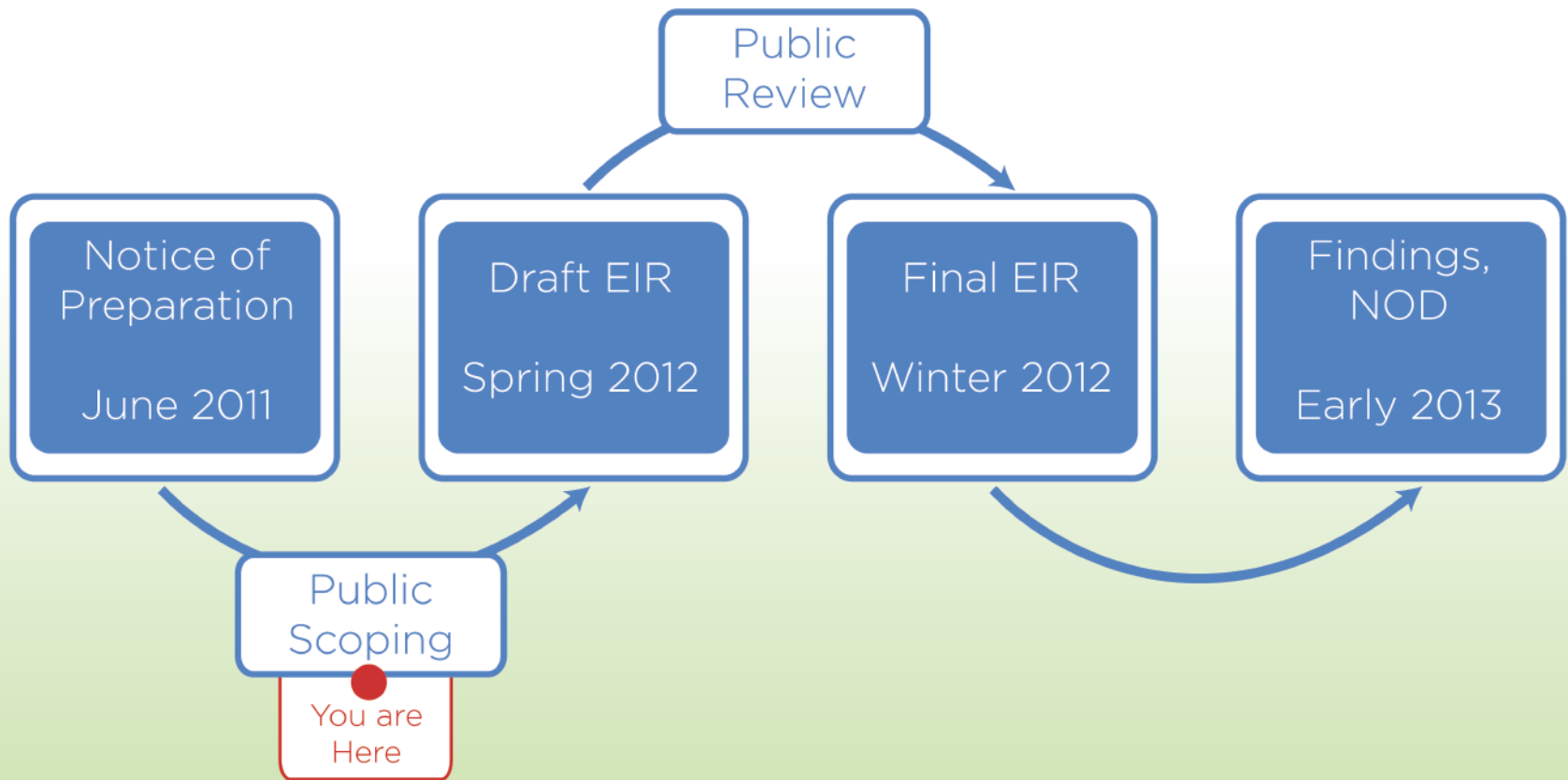
- ▶ **ALL GUESTS SIGN IN HERE**
- ▶ **INFORMATION, HANDOUTS, AND COMMENT CARDS FOR TONIGHT'S MEETING**

ENVIRONMENTAL RESOURCE TOPICS

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Climate Change
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing



CALIFORNIA DEPARTMENT OF
FOOD AND AGRICULTURE



EIR PROCESS AND TIMELINE



STATEWIDE PLANT PEST PREVENTION AND MANAGEMENT PROGRAM EIR COMMENTS

Please provide us with your input regarding the Draft EIR on the comment cards provided.

You can also take a comment card and mail it prior to the close of the comment period (July 25, 2011) to:

California Department of Food and Agriculture
Attn: Michele Dias, Acting Chief Counsel
1220 N Street, Suite 400
Sacramento, CA 95814

Or Email: PEIR.info@cdfa.ca.gov

THANK YOU

Appendix H
SCOPING MEETING PRESENTATION

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Statewide Plant Pest Prevention and Management Program *Environmental Impact Report*

Public Scoping Meeting

California Department of Food and Agriculture



Scoping Meeting Agenda

- Overview of California Environmental Quality Act (CEQA)
- Purpose of Scoping
- Overview of the CDFA Statewide Plant Pest Prevention and Management Program
- How to Submit Comments
- Process for Providing Comments Tonight
- Receipt of Public Comments

CEQA Overview and Purpose of Scoping

CEQA Overview

Purpose and Requirements

- Environmental review and disclosure for discretionary actions conducted by public agencies
- Discretionary action = a decision made using judgment
- Evaluation of potential environmental impacts
- Identification of mitigation measures and alternatives to reduce or avoid impacts
- Notification and informational tool for agencies and the public

CEQA Overview

Program EIR (PEIR)

- A PEIR is used to evaluate a series of connected actions which can be characterized as one large project.
- Also appropriate for analyzing individual activities carried out under the same or related statutory or regulatory authority, and which generally have similar potential environmental effects.
- Considers the program as specifically and comprehensively as possible, while acknowledging that some details may not be available at this scale of analysis.
- Serves as a “first-tier” environmental document.

CEQA Overview

Environmental Impact Report (EIR) Process



CEQA Overview

Tiering Process

- When a specific activity under the Program is ready for implementation, it is evaluated in the context of the PEIR to determine whether there are potential impacts which were not fully disclosed in the PEIR.
- If so, then a tiered CEQA document must be prepared. The tiered document will have a more limited scope – it focuses on the details of the specific activity, the impacts that were not fully disclosed in the PEIR, and any related mitigation measures or alternatives.
- Tiered environmental documents are subject to a public review process as mandated by CEQA.

Purpose of Scoping

Provide the public and agencies an opportunity to offer input into the scope and content of the PEIR, including:

- Information useful to the analysis
- Potential environmental issues
- Scope and range of alternatives
- Potential mitigation measures

Overview of the Statewide Plant Pest Prevention and Management Program (Statewide Program)

Statewide Program Overview

Scope of this PEIR

- Evaluate the range of activities carried out by CDFA against invasive plant pests throughout California
- Plant pest include arthropods, plant pathogens, noxious weeds and vertebrate plant pests
- Activities evaluated in the PEIR included:
 - Pest detection and response, including CDFA's use of the integrated pest management approach
 - Pest prevention and management programs, including specific pest groups
 - Authorized management approaches

Statewide Program Overview

Program Objectives

- Minimize the impacts of invasive plant pests to California's agricultural and environmental resources
- Promote the production of a safe, secure food supply
- Minimize the impacts of management approaches to human health and California's resources
- Support CDFA's goal of providing rapid response
- Develop a program that is broad enough to apply to a wide range of methods of management and pest groups in California

(Continued on next slide)

Statewide Program Overview

Program Objectives

- Be consistent with existing CDFA permits, protocols, and policies, such as CDFA's State Water Board NPDES Permit and federal Endangered Species Act, among others
- Develop a checklist evaluation tool that:
 - (1) Can be used by CDFA, other agencies and stakeholders to evaluate environmental impacts of specific projects and new pests or management approaches; and
 - (2) Can be understood and reviewed by the public



Statewide Program Overview

Discretionary Actions

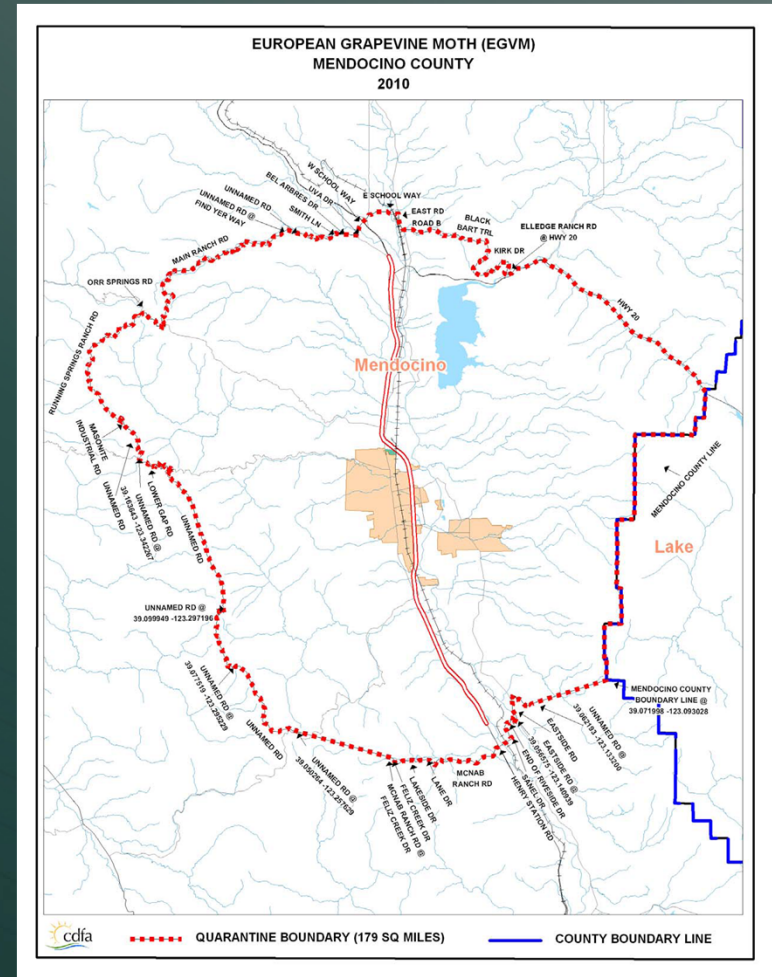
The discretionary actions contemplated by CDFA for the Statewide Program include:

- Existing CDFA pest prevention and management programs, where needed
 - Adoption of project-level checklist for evaluation of potential impacts related to implementation of specific pest prevention and management activities, as well as evaluation of the environmental impacts related to new pests, pest management approaches, and pest prevention and management programs
-
- The PEIR does not evaluate emergency projects implemented by CDFA

Statewide Program Overview

Pest Detection and Response

- Early Detection
- Rapid Response/Eradication
- Containment
- Exclusion
 - Quarantines
 - Inspections
- Project Implementation
 - CDFA
 - County agricultural commissioners
 - Other agencies
 - Private land owners, growers, etc.



Statewide Program Overview

Use of Integrated Pest Management Approach

1. Pest Identification
 - Existence and probability of a pest spreading in California
 - Environmental and economic implications of spread
2. Pest Population Threshold
 - A threshold is identified which guides the decision to undertake a project
3. Selection of Management Approaches
 - Human risk (highest priority)
 - Environmental damage
 - Efficacy
 - Available resources
4. Monitoring

Statewide Program Overview:

Pest Prevention and Management Programs

- Implemented and developed by CDFA's Plant Health and Pest Prevention Division
- Types
 - Public education
 - Plant pest identification and diagnostics
 - Pest detection
 - Weed management areas

(Continued on Next Slide)

Statewide Program Overview

Pest Prevention and Management Programs

- Development of management approaches
- Biological control program
- Implementation of federal regulations
- Permits and regulations program
- Environmental monitoring programs
- Guidance for response to specific pests (detection and use of management approaches)

Statewide Program Overview

Types of Management Approaches

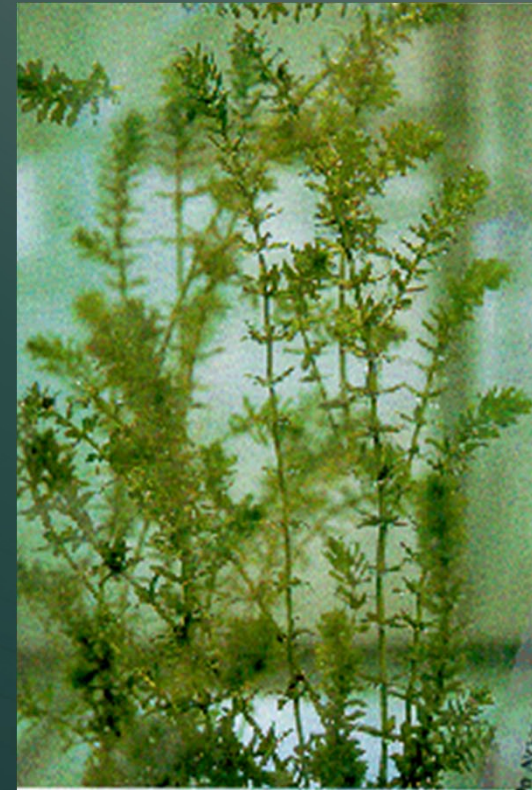
- Cultural
- Physical
- Biological
- Chemical
- Regulatory



Statewide Program Overview

Pest Groups with Existing CDFA Pest Prevention and Management Programs

- Eradication and Containment Programs
 - Invasive Arthropods Program
 - Noxious Weeds Program
 - Vertebrate Plant Pest Program
- Exclusion Programs
 - Interior Exclusion Program
 - Exterior Exclusion Program



How to Comment

- Oral comments at scoping meeting tonight, or
- Written comments due no later than Tuesday, July 25th

Mail or email comments to:

Michele Dias

California Department of Food and Agriculture

1220 N Street, Suite 400

Sacramento, CA 95814

Email: PEIR.info@cdfa.ca.gov

Include contact information (name, address, email and phone number) for future correspondence related to the PEIR

- All comments will be included in a Scoping Report prepared after the close of the scoping period, that will be available online: <http://www.cdfa.ca.gov/go/peir>

Process for Providing Oral Comments Tonight

- All people wishing to speak must fill out a speaker card.
- Each speaker will be allowed 3 minutes. If there are a relatively small number of speakers, this period may be extended.
- We will call each speaker individually, as well as notify those who are next in line.
- Respect the right of everyone to speak; please do not interrupt speakers.

Receipt of Public Comments

Appendix I
SCOPING MEETING ATTENDEES
AND COMMENTS RECEIVED AT SCOPING MEETING

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Sign-In Sheets

CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 6, 2011 – Chico, CA

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CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 6, 2011 – Chico, CA

[illegible]

**CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 7, 2011 – Sacramento, CA**

Name	Address	Email Address	Organization (optional)	Phone Number (optional)
Margareta Lela	1919 Calaveras Ave DAVIS, CA 95616	malelea@ucdavis.edu	UCD	
Aaron Webster	1415 Michigan Ave STOCKTON, CA 95204	awebster@cdfa.ca.gov	CDFA	
ED LAI VO	4885 ALCOSTO BLVD SONOMA CA 1	EDVOI@DEVILMOUNTINGROWERS.COM		
Neil Edgar	1822 21st St SAC 95811	neil@edgarinc.org		
Tom Kelly	1809 San Ramon Ave - Berkeley, CA 94707	jandtkelly@igc.org	Cal- Environ. Health Initiative	
Nan Wishner	5926 Masterson Rd Gazelle CA 96034	nan@cal-ehi.org	"	
Jim Grieshop		jgrieshop@ucdavis.edu	UCD	
Janet Gerland	9150 E Liberty Rd Clements CA 95227	janet@Devilmountaingrowers.com		

CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 7, 2011 – Sacramento, CA

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**CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 7, 2011 – Sacramento, CA**

Name	Address	Email Address	Organization (optional)	Phone Number (optional)
Mike Bortane	12200B J. P. Road Rd Jack Nevada City, CA 95559	MBOCTABO@annalocounty.org 4554 CA 95642	Annular County	209-223-6481
Matt Cotton	19375 Latic City Road	MATTE@MATTCOTTON.COM	ILWMC	530-265-4560
Tom Smith		tom.smith@fire.ca.gov	CalFire	916-599-6886
FRANK ZALOM	UC Davis DEPT. OF ENVIRONMENT	fzaloma@ucdavis.edu	UC Davis	530-752-3687
Alexandra Espinoza	1220 N Street Rm 221 Sec, CA	aespinoza@cdfa.ca.gov	CDFA	916-654-0317
David Brown	8631 Bond Rd ELK GROVE CA 95624			
Pablo Garza	555 Capitol Mall, #1290 Sacramento, CA 95814	pgarza@tnc.org	The Nature Conservancy	916-516-6674

CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 12, 2011 – Irvine, CA

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CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 13, 2011 – San Francisco, CA

Name	Address	Email Address	Organization (optional)	Phone Number (optional)
Veronica Raymond	5339 Santa Anita Ave Temple City, Cal. 91780	vfraymond@gmail.com	Action Now	
ROBERT ROACH	1428 ABBOTT ST SALINAS, CA 95901	ROACHB@ CO.MONTEREY.CA.US	AG comm	
Doug Johnson	Cal-IPC, 1442-A Walnut St, #462, Berkeley CA 94709	djohnson@ cal-ipc.org	Cal-IPC	510/843-3902
Nolan Isozaki	21 Pisa Court SF CA 94108	nolanisozaki@yahoo.com	Fiona MA	
Marcie Berman	1127 11th Street Ste Sacramento CA 95814	berman@bglaw.org	ILWU Teamsters	
Miguel A. Monroy	1390 Market St San Francisco	miguel.monroy@sfdph.org	SF. AgComm	415-252-3939
Lindsey Curley	1319 Duke Drive Davis, CA	lccurley@ucdavis.edu		

**CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 14, 2011 – Fresno, CA**

Name	Address	Email Address	Organization (optional)	Phone Number (optional)
Bob Blakely	554-592-3790 512 512 N. Kaweah Exeter CA 93221	bob@cacitrusmutual.com	CACitrusMutual	
James McFarlane	PO Box 1079 Clovis CA 93613	James@mcfarlane farms.com	Grower	
Jim Simonian	Box	Simonian Fruit Co Box Co	Packer	834-5921
MARCY MARTIN		mmartin@cgtpl.com	CGTFL	(415) 126-6330
David Pegos	1220 N St Sac, CA	dpegos@cdfa.ca.gov	CDFA	916-708-3031
CAROL HAFNER	1730 S MAPLE AV FRESNO CA 93702	chafner@co.fresno.ca.us	FCDA	559 600-7510
TEX BATKIN	11945 Ave 874 Visalia, CA 93277	ted@citrusresearch.org ted	Citrus Research Board	559-738-0246
GEORGE NIKOLICH	1467 E Dinuba Ave Reedley CA 93654	nikolich@gerawan.com	GERAWAN FARMING	
Melissa Puck	3341 E Ledbetter Bakersfield, CA 93308	melissap@paramountfarming.com	Paramount Farming	661 394 4456
Brian Dominguez	12711 W. Hedge Fresno 93728	Brian@afb.org	Fresno Co Farm Bureau	237-0263

CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 14, 2011 – Fresno, CA

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CDFA's Statewide Program
EIR Scoping Meeting Sign In Sheet
July 14, 2011 – Fresno, CA

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Webinar Attendance

Generated

Jul 25, 2011 03:35 PM PDT

General Information

Webinar Name

CDFA Statewide Plan Pest Prevention and

Webinar ID

926803362

Actual Start Date/Time

Jul 07, 2011 05:03 PM PDT

Actual Duration (minutes)

85

Clicked Registration Link

48

Opened Invitation

14

Total Attended

6

Session Details

Lugo,Matt	mlugo@cdfa.ca.gov
-----------	-------------------

Attended Yes

Registration Date

Jul 07, 2011 05:57 PM PDT

Address

1220 N Street

City

Sacramento

State

CA

Organization

CDFA

Unsubscribed

No

Zip Code

95814

Industry

Government - State & Local

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Jul 07, 2011 05:58 PM PDT	Jul 07, 2011 06:19 PM PDT	21.03

Interest Rating

Attendee's In-Session Level of Interest: 65

[Registration Q & A](#)[Questions Asked by Attendee](#)[Poll Questions](#)[Post Session Survey Questions](#)

Paswater,Pat	pat.paswater@calrecycle.ca.gov
--------------	--------------------------------

Attended Yes

Registration Date

Jun 24, 2011 10:43 AM PDT

Address

1001 I Street

City

Sacramento

State

CA

Organization

CalRecycle

Unsubscribed

No

Zip Code

95814

Industry

Government - State & Local

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Jul 07, 2011 05:46 PM PDT	Jul 07, 2011 06:28 PM PDT	42.6

Interest Rating

Attendee's In-Session Level of Interest: 46

[Registration Q & A](#)[Questions Asked by Attendee](#)[Poll Questions](#)

Post Session Survey Questions

Murphy,Deborra		dmurphy@cdfa.ca.gov
Attended	Yes	
Registration Date	Jul 07, 2011 05:22 PM PDT	
Address	1220 N Street Room 221	
City	Sacramento	
State	CA	
Organization	CDFA	
Unsubscribed	No	
Zip Code	95814	
Industry	Government - State & Local	
In Session		
Join Time	Leave Time	In Session Duration (minutes)
Jul 07, 2011 05:23 PM PDT	Jul 07, 2011 06:28 PM PDT	65.02
Interest Rating		
Attendee's In-Session Level of Interest:	51	
Registration Q & A		

Questions Asked by Attendee

Poll Questions

Post Session Survey Questions

Shoemaker,Charlotte		charshoes@aol.com
Attended	Yes	
Registration Date	Jul 06, 2011 01:36 PM PDT	
Address	1618 Parker St	
City	Berkeley	
State	CA	
Organization		
Unsubscribed	No	
Zip Code	94703	
Industry	Other	
In Session		
Join Time	Leave Time	In Session Duration (minutes)
Jul 07, 2011 05:35 PM PDT	Jul 07, 2011 05:38 PM PDT	2.97
Interest Rating		
Attendee's In-Session Level of Interest:	70	
Registration Q & A		

Questions Asked by Attendee

Poll Questions

Post Session Survey Questions

Bray,Dennis	dennis.bray@acgov.org
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Attended Yes

Registration Date Jun 28, 2011 09:26 AM PDT

Address

City

State

Organization Alameda Co Ag Commissioner

Unsubscribed No

Zip Code

Industry

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Jul 07, 2011 05:28 PM PDT	Jul 07, 2011 06:28 PM PDT	60.2

Interest Rating

Attendee's In-Session Level of Interest: 49

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Leondis,Lisa	lisa.leondis@sdcounty.ca.gov
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Attended Yes

Registration Date Jul 06, 2011 04:17 PM PDT

Address

City San Diego

State CA

Organization San Diego County Ag Dept.

Unsubscribed No

Zip Code 92123

Industry Government - State & Local

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Jul 07, 2011 05:29 PM PDT	Jul 07, 2011 05:44 PM PDT	15.32

Interest Rating

Attendee's In-Session Level of Interest: 48

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[Poll Questions](#)

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Zabel,Leah	lzabel@bwdlawgroup.com
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[Attended](#) No

Registration Date Jun 23, 2011 12:25 PM PDT

Address 1990 3rd Street, Suite 400

City Sacramento

State CA

Organization The Brenda Davis Law Group

Unsubscribed No

Zip Code 95811

Industry Legal

[In Session](#)

Join Time **Leave Time** **In Session Duration (minutes)**

Interest Rating

Attendee's In-Session Level of Interest:

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Bauer,Lauren	lbauer@kcwa.com
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[Attended](#) No

Registration Date Jun 24, 2011 04:33 PM PDT

Address P.O. Box 58

City Bakersfield

State CA

Organization Kern County Water Agency

Unsubscribed No

Zip Code 93302

Industry Government - State & Local

[In Session](#)

Join Time **Leave Time** **In Session Duration (minutes)**

Interest Rating

Attendee's In-Session Level of Interest:

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Northup,James	jimnorthup@prodigy.net
---------------	------------------------

Attended No
Registration Date Jul 06, 2011 12:14 PM PDT
Address 1204 Snyder Dr
City Davis
State CA
Organization Stop the Spray East Bay
Unsubscribed No
Zip Code 95616
Industry High Tech - Other

[In Session](#)

Join Time **Leave Time** **In Session Duration (minutes)**

Interest Rating

Attendee's In-Session Level of Interest:

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Eaton,Ronnie	eatonohana@mindspring.com
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Attended No
Registration Date Jun 24, 2011 12:49 PM PDT
Address 224 W. Winton Ave, Rm 184
City Hayward
State CA
Organization Alameda County Department of Agriculture
Unsubscribed No
Zip Code 94544
Industry Government - State & Local

[In Session](#)

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Speaker Cards

CDFA Statewide Program Scoping
Speaker Card

Name: Al Beck
Comment(s):

Date: 6/29/2011

? Program for Arundo on Creek banks

CDFA Statewide Program Scoping
Speaker Card

Name: Louie Mendoza
Comment(s):

Date: 7/1/2011

CDFA Statewide Program Scoping
Speaker Card

Name: *Mary Herff*
Comment(s):

Date: *7/6/11*

CDFA Statewide Program Scoping
Speaker Card

Name: *Richard Price*
Comment(s):

Date: *7/6/11*

CDFA Statewide Program Scoping
Speaker Card

Name: FRANK ZARON

Date: 7/7/2011

Comment(s):

- 1) The EIR is for a proposed Statewide Pest Prevention & Management Program; will there be an opportunity for public discussion of the Program itself? There may not be a need for a programmatic EIR as it lacks specificity.
- 2) IPM is pest/site specific. Is ~~it possible~~ ^{it possible} for an overarching EIR to address even a majority of Invasive pest issues?
- 3) Threshold for significance - how is this determined?
- 4) Emergency - what process is used to determine an 'emergency'?
Declaration of an emergency could circumvent the CEQA/EIR process
- 5) Consider ~~re~~ pre-evaluation of emergency or other actions as information about pest status becomes better understood
- 6) ~~List~~ List of environmental issues - consider impacts on farmers; cost of control; increased use of pesticides required to comply with quarantines.
- 7) Technical Advisory Committee used for evaluating pest response; consider a public advisory committee ~~to~~ to consider impacts of the proposed response.

CDFA Statewide Program Scoping
Speaker Card

Name: David Brown

Date:

Comment(s):

Is there any interest in including pests for livestock as a part of this programmatic EIR? If not, why not

Name: Nan Wishner
Comment(s):

Date: 7/7/11

[illegible]

Name: Lynn Elliot-Harding
Comment(s):

Date: 7-7-11

[illegible]

Name: Mike Boitane
Comment(s):

Name:

Mike Boitano

Date: 7-7-11

Comment(s):

CDFA Statewide Program Scoping

Speaker Card

Name: Doug Johnson
Comment(s):

Date: 7-13-11

1. Stress "exterior exclusion"

2. Evaluate impacts of all mgmt approaches

3. Revisit EIR regularly

4. Lean toward additional ^{local} public input for each future mgmt project.

5. Consider how to cover mgmt of invasive plants not listed as noxious

CDFA Statewide Program Scoping
Speaker Card

Name:

①

Date:

Comment(s):

Bob Blakey

CDFA Statewide Program Scoping
Speaker Card

Name:

②

Date:

Comment(s):

James McFarlane

7-14-2011

[illegible]

Date: 7/14/11

[illegible]

Comments Submitted at Meetings

July 7, 2011

To: Cliff Rechtschaffen
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

From: Michael Boitano
Amador County Agricultural Commissioner
12200-B Airport Road
Jackson Ca 95642

Ref: Notice of Preparation for the Statewide Plant Pest Prevention and
Management Program Environmental Impact Report.

Dear Sir:

My name is Mike Boitano. I am the Agricultural Commissioner in Amador County. I stand before you today in support of the Environmental Impact Report that CDFA is now in the process of completing.

I'm also here to encourage CDFA to include terrestrial noxious and invasive weeds in the EIR. Due to budget cutbacks, CDFA has done away with all infrastructures that dealt with weeds. Weed management areas and local county weed programs will now be left without a secure funding source or expertise. Weed management groups are not a new concept but have proven themselves as one that has truly been a tremendous success. The concept of bringing many people with many different backgrounds to the table to deal with noxious or invasive weeds has proven to work. It is the hope of many that CDFA will be able to reconstruct some sort of weed program in the future.

There are counties within the state that have had long-standing weed programs. Amador County has had a continuous weed program for the last 80+ years. It is vital that those counties that can and are willing to continue with these local weed programs must be allowed to do so. We need your help; the document you are about to prepare and get certified needs to include those local noxious and invasive weed programs.

The use of chemicals to control invasive and noxious plants and insects is not a new concept. California has the most stringent laws pertaining to the use of pesticides in the world. While we all strive to lessen the impacts of pesticides on the environment, we find that pesticides used to control these invasive are an integral part of the Integrated Pest Management program. County and weed management areas all use the integrated pest management approach to control invasive plants and insects.

Noxious and invasive weeds are a constant threat to the environment of California. In the heavily farmed areas of the state we do not see the rise or the size of infestations that we can find in nonproduction areas. How many of us have walked down along a river or creek or around a lake and had to change our path because of yellow starthistle? How many areas do we have in the state that has been taken over by noxious weeds that are crowding out natural vegetation? What is the fire danger created by large noxious weeds? I can show you what happens when you allow a stand of Salt Cedar to get established along a creek. (These plants can use up to 300 gallons of water a day). Pesticides are a needed tool in the control of both invasive plants and insects. Please allow us to use these tools.

I would like to leave you with a poem that was written by Patrick J. Griffin, Siskiyou County Agricultural Commissioner. I think it sums up what we are all feeling.

The Silent Invasion

They come by day, they come by night
Taking our land without a fight
They come from near, they come from far
They stick to your shoes and ride on your car
They fight with persistence and show no fear
Claiming millions of acres in just one year
They have no natural enemies in this new land
It's an easy battle and victory is at hand

In conclusion, I would like to state that we in the agricultural departments throughout the state have always considered weeds a major problem. We have worked on them through the good and the bad times. We are now asking that you remember the **outstanding** work that has been done both by the counties and the weed management's groups and give us the tools we need to continue this fight.

I would like to restate that I am very supportive of this effort and will make myself available if you have any questions. My email address is mboitano@amadorgov.org and my phone number is 209-223-6481.



CALIFORNIA CITRUS MUTUAL COMMENTS
DRAFT EIR REPORT FOR THE
STATEWIDE PLANT PEST PREVENTION AND MGT PROGRAM

California Citrus Mutual is a statewide citrus producers' trade association with a voluntary membership exceeding 2000 growers. The industry as a whole produces several varieties of citrus throughout the state the combined total of which is estimated to be \$1.8 billion. The industry also employs in excess of 12,000 people

According to an Arizona State economic impact analysis the industry also accounts for another \$1.2 billion in economic activity with some 10,000 individuals benefitting from this activity. A misstep on any activity within this program would definitely adversely affect these numbers significantly.

As an entity that represents specialty crop producers and a highly perishable commodity which is susceptible to a variety of invasive pests and diseases Citrus Mutual has partnered with state, federal and urban representatives to achieve objectives to prevent the introduction of pests and as necessary the eradication and/or suppression of those pests.

We believe the objectives outlined more than adequately describe a statewide program. We strongly support the statements speaking to minimize impacts in a variety of areas. We don't believe these statements are incompatible with the objective of promoting the production of a safe and secure food supply.

Nor do we believe they are in conflict with the goal of a rapid response to the detriment of society and the environment.. Some are contending that this effort undercuts a stated goal of protection our state's environment and the inhabitants within the state. This process was developed via legislation authored by Assemblyman John Laird, AB 2763 signed into law in 2008. For others to contend this process is now undercutting their ability to articulate concerns is blatantly wrong and counter to their agreement during legislative deliberations.

Today California is being inundated by invasive pests or diseases. According to the University of California every 60 days California gains a new and potentially damaging invasive species. Weeds alone create a \$82 million loss while other pests damage our environment, both urban and rural to the tune of \$3 billion per annum in their estimation.

In fact a rapid response insures that minimal impacts occur in/on the people of California and the environment. CDFA's stated objective of utilizing a wide range of

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methods speaks to the Department's ability to adapt as necessary in a variety of forms. New science can offer new solutions. Different levels of infestation can create different responses. The type of infestation offers solution choices as well. All this clearly indicates the Department's sensitivity to achieving the stated goal without creating unwanted or unintended consequences.

CDFA clearly points out why pest detection and response is the cornerstone of any statewide program. An adequate system of detection devices seemingly creates more finds. However if found soon enough more does not mean a high number of individual pests. More finds creates the opportunity to find pests in isolated numbers and respond in a much less intrusive manner. If we had a program that was better at exclusion and/or early warning we wouldn't be fighting the arrival of a killer bull frog adversely effecting native populations of frog and fish for example.

We wouldn't have an invasive ant or Formosan termite killing ornamental trees. Africanized honey bees, red imported fire ant would not be two urban pests requiring attention. Beetles would not be killing our eucalyptus, oak and pine trees along the coast, on our golf courses or at our homes.

During the first week of July Time Magazine ran an article about the "Pest Eating Its Away Across America." The Ash-borer is coming and its hungry! Chicago reports 93,000 trees lost. Fort Wayne, Indiana reports another 2000 dead ash trees with 1200 scheduled for removal.

This proposal provides a pathway that designates what CDFA must do to protect against future threats if introduced. This proposal provides the general public the thought process for making a determination on how best to protect our environment from invasive pest or disease.

The Department acknowledges that this early warning system can be intrusive on commercial, homeowner, rural and urban settings. But it rightfully points out that this type of system reduces the need of a broad or widespread treatment program. It rightfully points out that a few pests are far easier to eradicate than waiting for a massive invasion to occur. And the Department correctly acknowledges that this situation can occur in a multitude of environments within commercial and private settings.

The management tactics described is a direct result of the early warning system. The lack of same requires the use of more intrusive tools more often. An early detection reduces a program's scope, reduces costs and burdens and is less controversial. Citrus Mutual members have been subject to this combination of tactics. Citrus Mutual has participated in dialogue to help develop the best tactic for the situation. Citrus Mutual has witnessed the Department relying upon experts within the University system, around the country and around the world before a tactical decision is made or implemented.

We're also cognizant of the Department's desire to communicate. Commercial agriculture has a stake in detection, treatment, eradication or suppression programs. Homeowners in rural and urban settings can also be victims thus the seriousness of the situation for these stakeholders is not ignored. Our forests, parks and other picturesque settings are of equal importance as are recreational areas. The Department, historically, has made communications an important component of these programs. In fact Citrus Mutual believes communications are as important as the actual application of a treatment tactic.

There are multiple stakeholders interested in these efforts and we believe the Department has recognized the individuals and potential concerns within this document. We support this effort, its contents and urge its adoption.



...The Bug That's Eating America

BY ANITA HAMILTON



TO WALK DOWN A STREET IN Midland, Mich., this summer is to witness a scene of mass carnage: row upon row of tree stumps with just a scattering of sawdust around them. This trail of destruction is the work not of tornadoes or of man but of a voracious beetle known as the emerald ash borer, first found in the U.S. in Detroit in 2002. The spreading infestation has killed some 60 million ash trees in 15 states stretching east to New York and south to Tennessee, and by the end of this year the death toll will likely surpass that of Dutch elm disease. "It is now the most destructive forest insect ever to invade North America," says Deb McCullough, an entomologist at Michigan State University. "We literally cannot keep up with it."

The iridescent bug is a recent arrival. Native to China, it probably migrated to the U.S. burrowed inside wooden shipping pallets. It has few predators in North America, which is one reason the speed of the outbreak is unprecedented. And most of its damage is done unseen. Mature beetles bore through the outer bark and into the phloem—the vascular tissue that carries sugars from the leaves to the rest of the tree—and lay eggs there in May and June. When the eggs hatch, the larvae feed on the nutrients in the phloem, in effect starving the tree.

There are an estimated 8 billion ash trees in the U.S., and none of the 16 species is resistant to the pest, says researcher Dan Herms of Ohio State University. That includes the northern white ash, which provides the wood of choice for the Louisville Slugger baseball bat. Treating infested trees with insecticide kills adult ash borers but not always the larvae, so while it can slow down an infestation, it can't stop it entirely.

In the 1960s, American cities and towns began planting ash trees, long favored for their stately silhouette and abundant foliage, to replace trees killed off by the Dutch

elm scourge. But this approach, known as monoculture—in which block after block is lined with the same kind of tree—has made those areas especially vulnerable to the ash borer. The city of Fort Wayne, Ind., has already cut down 2,000 ash trees to stop the insect's spread and will likely have to remove an additional 1,200. Chicago can expect most of its 93,000 ash trees to be affected and is projected to spend as much as \$46 million by 2020 to defend its foliage. All told, U.S. cities will spend more than \$10 billion over the next decade to treat or remove infested trees, according to a recent study in *Ecological Economics*.

Other efforts to thwart the borers are also under way. Quarantines on transporting firewood that might be incubating the winged invaders are widely in place. And another Chinese immigrant is being enlisted in the war on *Agrilus planipennis*. In eight states this summer, the U.S. Department of Agriculture (USDA) is releasing more than 150,000 stingless wasps, sworn enemy of the ash borer, imported from the same forests in China where the borer occurs naturally and bred in a Michigan laboratory. "These things

are like little hunter-seekers. Their whole mission is to go and find the emerald ash borer," says USDA scientist Jon Lelito. The wasps, which look like tiny flying ants, lay their eggs on the larvae or the eggs of the ash borer. When the wasp eggs hatch, the wasps feed on the ash borers.

If that solution sounds ominous—past efforts to deploy nonnative predators against pests have spiraled out of control—Lelito says the USDA's environmental-impact study predicts that as ash-borer populations decline, so will the number of wasps, until the two populations reach an equilibrium. "That's the advantage of biocontrol" over harsh pesticides, Lelito says. "There's nothing that lingers in the environment."

In the meantime, arborists are redesigning their treescapes. In Milwaukee, each block will have up to four different tree types, including lindens, oaks, maples and hackberries. "We're trying to protect ourselves so we won't have entire blocks with no trees," says the city's forestry-services manager, David Sivyer. For cities across the Midwest, that barren landscape is already a reality. ■

Species Invaders. Alas, these immigrants have made themselves right at home



NUTRIA

These giant rats, weighing up to 20 lb. (9 kg), arrived from South America in the early 1900s and were initially farmed for their fur. Once they relocated into the wild, their population exploded in the Maryland wetlands. Not picky about their diet, they can chew through tree trunks, wooden frames of houses and even the occasional tire when they are hungry.



FERAL SWINE

The offspring of European imports that escaped and bred in the wild number in the millions and cause an estimated \$8 million per year in property damage. Weighing over 300 lb. (136 kg), they have a better sense of smell and are faster than domesticated pigs. The largest population is in Texas, but these heavyweights have been found everywhere from California to Maine.



ASIAN CARP

Originally imported to clean catfish ponds in Arkansas in the 1970s, Asian carp quickly escaped and migrated up the Mississippi River as far as the Great Lakes. They grow up to 4 ft. (1.2 m) long and 100 lb. (45 kg) and devour the plankton that native fish need to survive. While jumping out of the water, the "flying" silver carp have even broken people's noses.

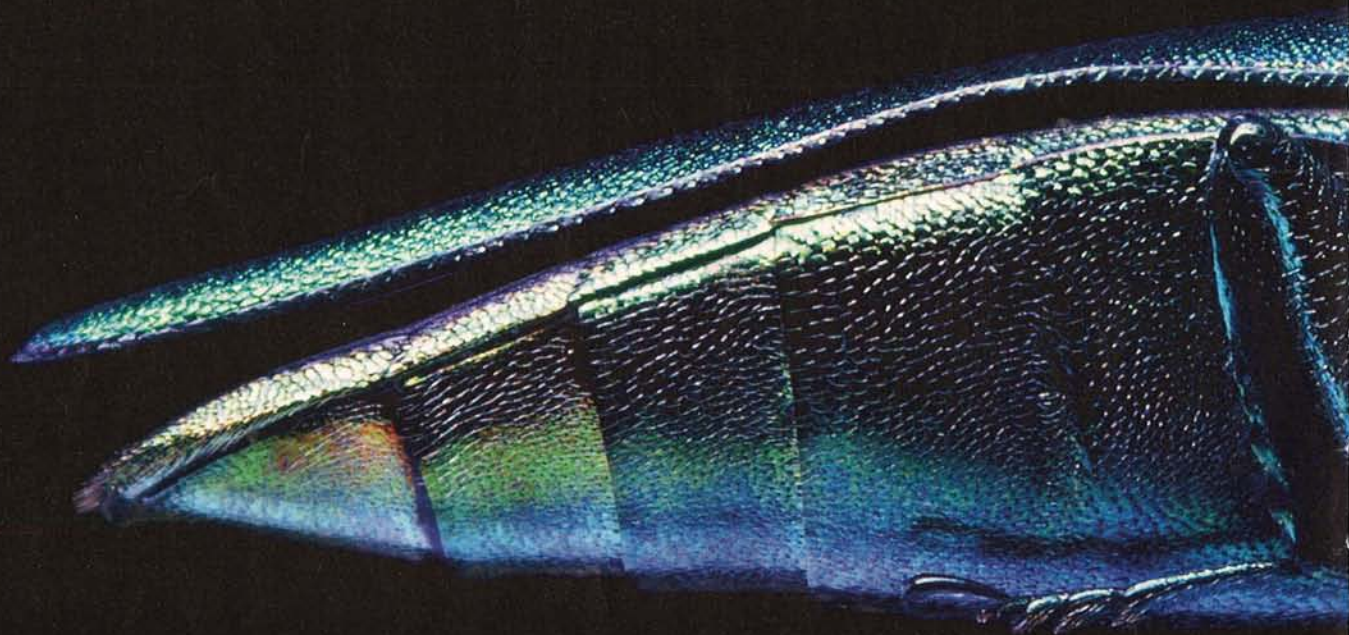


BURMESE PYTHON

Popular pets for their dramatic size and lack of venom, Burmese pythons went native after too many pet owners set them free. Around 2000, they began breeding in the Florida Everglades, where there are now an estimated 30,000. The carnivorous snakes typically grow to about 12 ft. (3.6 m) long and feed on endangered birds, fish, wood rats and squirrels.

ENVIRONMENT

This is an ash borer. It's from China. Since it was found in the U.S. in 2002, it has killed some 60 million trees in 15 states. Cities will spend more than \$10 billion over the next decade to try to stop...



businesses and individuals, incidents that the IT-security experts concede are growing rapidly. Black-hat hackers are adapting social networks to establish an evil ecosystem while exploiting its vulnerabilities to steal data and money. Their tool kit includes social-engineering techniques that dupe you into coughing up passwords. Their malware is getting better: botnets (networks of infected computers) are growing, as are “man in the middle” schemes that redirect your Web traffic.

It's a new plug-and-play environment as hackers specialize, link with other specialists as needed and offer a variety of goods and services. You don't even have to be a hacker to use some of the available products. There's 24/7 customer support. Malware consortiums like Zeus produce botnets that let you invade and infest computer systems. You can obtain specific parts of botnet code that you can customize for your own use to hack individual bank accounts. Need a “mule” to set up an account to transfer stolen money into? That service can be provided too. “There's a whole supply chain here,” says AVG's Smith. “The guys who develop it, update, use it, and people who have to get the money. It's hard to find *the* guy.”

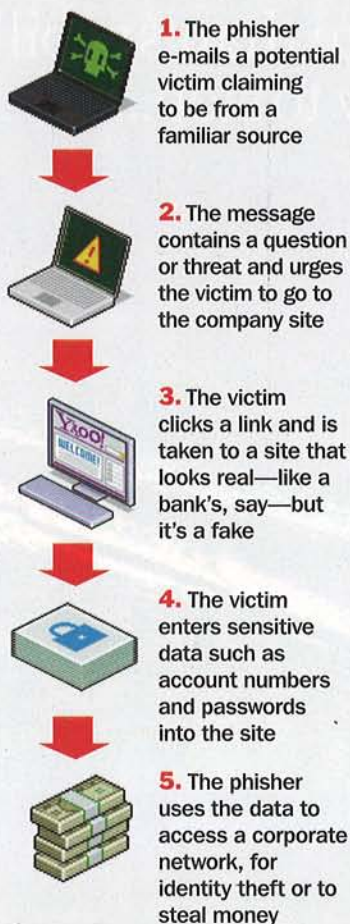
Not that the cops aren't looking. Zeus suffered a major hit when the U.S. charged 70 people with involvement in the cyber-crime ring in September 2010. Its response was to merge with SpyEye, another botnet maker. The point, as with any other merger, is to improve efficiency and profits. The combined Zeus-SpyEye, for example, is making an even more damaging bot called “browser in the middle” that allows thieves to manipulate the data that a user sends to a bank. The bank may see six authorizations for payment when the user thinks she's sending one. When the bank acknowledges the six authorizations, the browser intercepts and shows the user only one.

Hackers have discovered that small and medium-size businesses (SMBs) are far more vulnerable than major corporations. SMBs can't afford the kinds of costly defenses the big guys can erect if they choose. The stakes are higher too. If someone hacks your personal bank account, you'll be made whole. But courts in many states have ruled that if someone hacks a business account and the bank followed standard security protocols, the business is on the hook for the money.

Hackers haven't forgotten about you either. While the Web has encouraged sharing via Facebook and LinkedIn, those networks have become portholes to problems. Friend the wrong person and go to that unknown friend's recommended website, and you are asking for trouble, buddy.

High Alert. Are cyberhackers coming for you?

PHISHING 101



PASSWORD PROTECTION

Hacking your password gets much harder if you follow these tips

The longer the password the better

PASSword8!

Use a mix of upper and lower case letters

Use numbers

Use special characters

A Facebook bug called Koobface that takes over your account is infecting a million accounts daily, says IronKey's Jevans. As for LinkedIn, he says, “I can make a very authentic-looking LinkedIn invite.”

Hackers are also using the data gamed from social-network sites to build credible individual identities with which they can infiltrate corporations and websites. Even if you don't have a Facebook account, someone could create one for you—as happened to the head of Interpol.

The Counterattack

THE GOOD GUYS AREN'T STANDING STILL, of course. The focus now is to disconnect a person's e-mail and browser from the rest of the network with a variety of security layers. Companies are also figuring out new ways to protect themselves from employees who work at home beyond the corporate firewall and from the growing threats via mobile devices, including iPads and other tablet computers. Until then, corporations and government agencies are well advised to keep the doors locked, change the default settings and train employees to be on guard for spear phishing and social engineering.

We think in terms of Moore's law—that computing speed doubles every 18 months. But “hackers are thinking in days,” says Entrust's Conner. There are things you can do to help protect yourself: not just changing your passwords but also making them long enough and complex enough to be a meaningful deterrent. But at a more basic level, it's about not oversharing with people you may or may not know and being a little more cautious even with people you think you know. It takes a little of the social out of social networks, but it's safer.

“The main thing is that it's going social. If you look at Lulz, would you believe a hacking group has a p.r. office, a Twitter account and a request line?” asks Jevans. “It's crazy. It's creating a whole new culture of people who feel they are entitled to do it.”

That's sort of how LulzSec feels. It has prodded the public for its watching-the-train-wreck attitude toward hacking. But even LulzSec doesn't know how long it can last. British officials recently arrested a hacker who may be part of the group. “We'll continue creating things that are exciting and new until we're brought to justice, which we might well be,” says LulzSec. “But you know, we just don't give a living f--- at this point. You'll forget about us in three months' time when there's a new scandal to gawk at.”

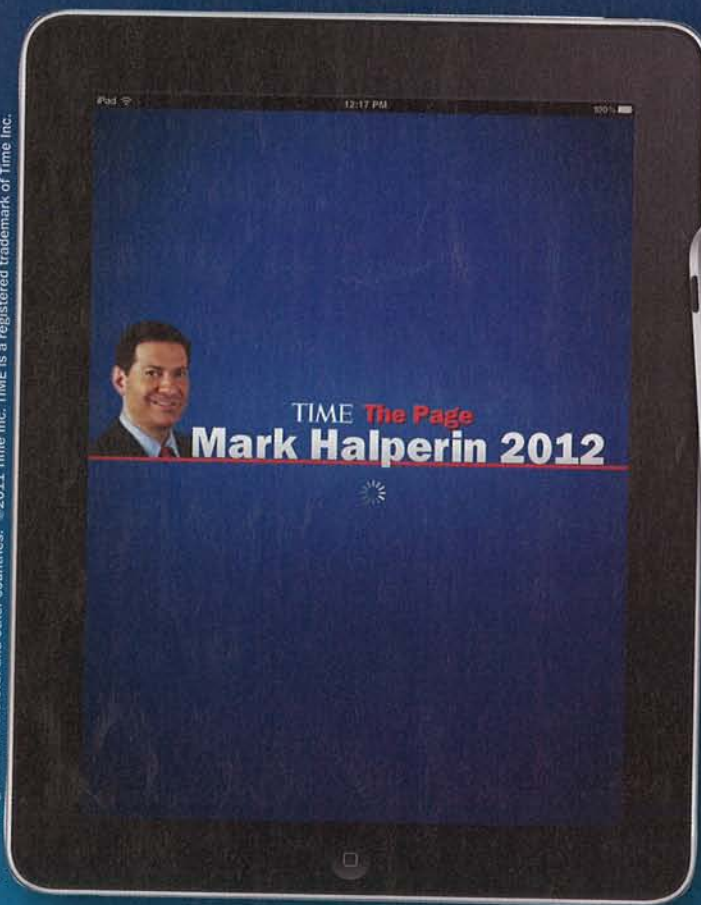
At the rate the hackers are moving, it may be even sooner than that. It's the damage that could be lasting. ■



Path of destruction Trails left by ash-borer larvae, which feed on nutrients below the bark, on a tree in Midland, Mich.

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July 14, 2011

Michele Dias
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Subject: CDFA Statewide Plant Pest Prevention and Management Program

Dear Ms. Dias,


On behalf of the Fresno County Farm Bureau, an agricultural nonprofit representing approximately 4,000 members, I write in support of the California Department of Food and Agriculture's (CDFA) efforts to develop an Environmental Impact Report (EIR) for a Statewide Plant Pest Prevention and Management Program.

The EIR process will allow CDFA to involve the public in assuring that their programs run more efficiently by conducting the environmental review. Additionally, this process will result in a more rapid response by the department when a new pest or plant disease enters California.

If pests infiltrate our borders, farmers can lose their crops and markets; therefore, the eradication of invasive species and plants should be addressed immediately through a comprehensive approach as described in this program.

In sum, the Fresno County Farm Bureau supports CDFA's mission to prevent invasive species through the environmental review and analysis of various pest prevention and management activities statewide.

Sincerely,



Ryan Jacobsen,
CEO/Executive Director

Appendix J
WRITTEN COMMENTS RECEIVED DURING SCOPING PERIOD

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DOROTHEA DORENZ
ALBANY/BERKELEY COALITION FOR ENVIRONMENTAL HEALTH
1200 NEILSON ST. B
BERKELEY, CAL 94706



March 17, 2011

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814

Dear Governor Brown and CDFA Secretary Ross:

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:

1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a specific project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.

This PEIR's strategy, to evaluate in advance the environmental impacts of various treatments, denies the public the right to information and participation guaranteed by CEQA. Attempting to approve a pest control method now that might not be applied in a community until years in the future does not give residents adequate voice in the decision regarding its use in their neighborhoods.

3) Spending tax money on a two-year process for a consultant to prepare document that would thwart the basic requirements of CEQA and that is almost certain to result in a lawsuit would be unconscionable at any time but particularly now when the state budget and essential programs and services are being dramatically cut.

March 17, 2011



Dear CDFA Secretary Ross,

I would love to bring your attention to an urgent issue. As you know, the California Department of Food and Agriculture is preparing a Programmatic Environmental Impact Report (PEIR) of future invasive species eradication and control programs in California. Please consider immediately stopping the process for the following reasons:

- A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a *specific* project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.
- This PEIR's strategy, to evaluate in advance the environmental impacts of various treatments, denies the public the right to information and participation guaranteed by CEQA. Attempting to approve a pest control method now that might not be applied in a community until years in the future does not give residents adequate voice in the decision regarding its use in their neighborhoods.
- Spending tax money on a two-year process for a consultant to prepare document that would thwart the basic requirements of CEQA and that is likely to result in a lawsuit seems unwise, particularly now when the state budget and essential programs and services are being dramatically cut.

The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I urge you to propose a different strategy.

Thank you for your help.
Sincerely,

Jenny Josephian
605 Del Valle Circle
El Sobrante CA 94803

Nancy Snedden



4348 Montgomery St.
Oakland CA 94611-4712
Phone/fax: 510.654.3199; nsnedden@earthlink.net

March 17, 2011

Governor Jerry Brown
State Capitol, Suite 1173
Sacramento CA 95814

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814

Dear Governor Brown and CDFA Secretary Ross:

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:

1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a *specific* project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.

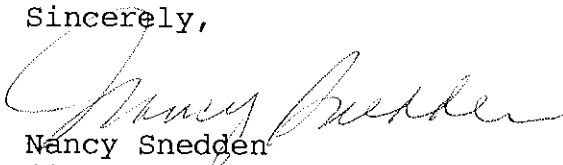
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The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

I'd like to ask: Where is your conscience in making decisions like this that clearly have a negative, sometimes irreversible, effect on environment and health? How can decisions like this be even considered by intelligent, sensitive and conscientious people, not to mention, public servants? Please wake up and "smell the roses" while there still are some.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nancy Snedden".

Nancy Snedden
4348 Montgomery St
Oakland CA 94611

Governor Jerry Brown
State Capitol, Suite 1173
Sacramento CA 95814
Fax: 916-558-3160
email at: http://gov.ca.gov/m_contact.php

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
fax: 916/653-4723
email: secretary.ross@cdfa.ca.gov

March 17, 2011


Dear Governor Brown and CDFA Secretary Ross:

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- 1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a *specific* project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.
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The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,


Tamarind Fleischman
109 Monte Vista Ave.
Oakland, CA 94611

Governor Jerry Brown
State Capitol, Suite 1173
Sacramento CA 95814
Fax: 916-558-3160
email at: http://gov.ca.gov/m_contact.php

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
fax: 916/653-4723
email: secretary.ross@cdfa.ca.gov

March 17, 2011

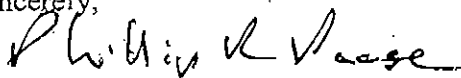
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The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,



Phillip Pease
109 Monte Vista Ave.
Oakland, CA 94611



Governor Jerry Brown
State Capitol, Suite 1173
Sacramento, CA 95814

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814

March 19, 2011


Dear Governor Brown and CDFA Secretary Ross:

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:

- 1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a *specific* project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.
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- 3) Spending tax money on a two-year process for a consultant to prepare document that would thwart the basic requirements of CEQA and that is almost certain to result in a lawsuit would be unconscionable at any time but particularly now when the state budget and essential programs and services are being dramatically cut.

The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,


Lauren Schiffman
1343 S. 59th Street
Richmond, CA 94804



Charlotte Shoemaker

1618 Parker Street, Berkeley CA 94703
510 540 7185 charshoes@aol.com

March 19, 2011

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814

Dear CDFA Secretary Ross:

Now that the CDFA has a new Secretary, I am hopeful that this department can shift away from the unscientific, dangerous and expensive policies that characterized the last department, particularly in regard to its' destructive and unnecessary LBAM eradication program.

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:

1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a specific project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.

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The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,

Charlotte Shoemaker

Fax Transmission Sheet

Date: March 20, 2011

To: Karen Ross, Secretary – California Department of Food and Agriculture (CDFA)
Fax: 916/653-4723

From: Nan Wishner – Stop the Spray East Bay (STS EB)
Tom Kelly, JD – Stop the Spray East Bay (STS EB)
Debbie Friedman, JD – Mothers of Marin Against the Spray (MOMAS)

Re: The Invasive Species PEIR, the CISAC Strategic Framework, and Sustainable Agriculture

Pages: 8 (incl. cover page)

cc: Governor Jerry Brown (fax 916/ 558-3160)

cc:

Secretaries appointed to the ISCC -

- Secretary John Laird, California Natural Resources Agency (fax 916/653-8102)
- Secretary Linda S. Adams, California Environmental Protection Agency (fax 916/324-0908)
- Secretary Dale E. Bonner, California Business, Transportation and Housing Agency
(fax 916/323-5440)
- Secretary Diana S. Dooley, California Health and Human Services Agency (fax 916/654-3343)
- Acting Secretary Mike Dayton, California Emergency Management Agency (fax 916/845-8511)

cc:

Senate Committee on Agriculture -

Senator Anthony Cannella	(fax 916/445-0773)
Senator Michael Rubio	(fax 916/327-5989)
Senator Tom Berryhill	(fax 916/327-3523)
Senator Noreen Evans	(fax 916/323-6958)
Senator Doug La Malfa	(fax 916/445-7750)
Senator Juan Vargas	(fax 916/327-3522)
Senator Lois Wolk	(fax 916/323-2304)

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STOP THE SPRAY EAST BAY (STSEB) and MOTHERS OF MARIN AGAINST THE SPRAY (MOMAS)

Karen Ross, Secretary
California Department of Food and Agriculture (CDFA)
1220 N Street
Sacramento, California, 95814

March 20, 2011

Via e-mail: secretary.ross@cdfa.ca.gov
Via facsimile: (916) 653-4723

Re: The Invasive Species PEIR, the CISAC Strategic Framework, and Sustainable Agriculture

Dear Secretary Ross,

Congratulations on your recent appointment as Secretary of the California Department of Food and Agriculture (CDFA). You are in a position to guide the state's agricultural industry in a historic and life-changing direction to improve the quality and quantity of food grown here while simultaneously reducing the harmful impacts of industrial agricultural practices. We look forward to working with you on many issues of common concern.

We are looking forward to our meeting with you on April 7th and provide these comments to give you a sense of the issues we would like to cover with you at the meeting.

We believe that it is possible to improve our food production and protect the health and economic well-being of our agricultural community, as well as consumers of California-grown food, while dramatically reducing the amounts of chemical fertilizers and pesticides that are applied to the state's agricultural lands.

We wish to meet with you and your staff to discuss the following issues:

- 1) The recently announced decision to proceed with preparation of a Programmatic Environmental Impact Report (PEIR) for future invasive species treatments.
- 2) The final Strategic Framework developed by the California Invasive Species Advisory Committee (CISAC) that has not yet been released for public review.
- 3) Sustainable agriculture in California as a primary approach to invasive species control that provides many other benefits as well.

Invasive Species PEIR

CISAC recommended, and CDFA has already taken action on, development of a Programmatic Environmental Impact Report (PEIR) to cover all of CDFA's future pest programs. As described by CDFA's attorney at the March 9, 2011 CISAC meeting, that PEIR would be designed to allow the CDFA to manage any pest it deems invasive, at any time or location in the future, without carrying out any further site- or project-specific environmental review. This approach would thwart the basic principles of the California Environmental Quality Act (CEQA). That is, a PEIR of this type will not allow for meaningful public input or adequate information for decision makers to evaluate environmental impacts. The light brown apple moth (LBAM) PEIR is currently being challenged in two lawsuits for precisely this same strategy: attempting to evaluate the impacts of a program that could be carried out at any place in the state, at any time in the future, without any specific assessment of unique conditions at the locations where the treatments might be used. It is, in our opinion, a waste of taxpayer money to undertake a new and even broader PEIR that will have very little chance of withstanding judicial scrutiny. Please note that we are not opposed to advance planning for possible impacts

of introduced species on health and agriculture, but we do not believe it is prudent or legal to attempt to prepare a PEIR that would give advance approval years into the future for treatment programs that could significantly impact community and food safety.

Strategic Framework

A revised and final version of the CISAC Draft Strategic Framework (DSF) was apparently approved by the Invasive Species Council of California (ISCC), CISAC's parent organization, at its December 2010 meeting. It is our understanding that the revised document addresses public input received by CISAC last fall; however, the public has never seen the revised document, nor has CISAC published any response to public comment. Therefore, we have no means of knowing whether the approved document adequately incorporates the concerns that so many of us expressed. We tried repeatedly to obtain a copy of the final document before its review and acceptance by Agency Secretaries but have been advised by Dr. Leavitt at the CDFA that there is no current plan in place for its release to the public.

In addition to the issue of the PEIR noted above, a major problem with the DSF is that it did not consider the health and environmental effects of pesticides. We are concerned that this omission might not have been addressed in the final revised document. In the DSF, health was addressed only in the context of the potential health impacts of invasive species, not with regard to the health effects of invasive species management. Our concern about this issue grows out of a long history of invasive species control programs that have had health and environmental impacts, most recently the CDFA's misguided efforts to "eradicate" LBAM by spraying an untested pesticide (whose inert ingredients were not known) over populated areas and sensitive natural environments. As we now know, the LBAM has NOT done any documented damage to California crops or forests. (Attached is a record evidencing no damage by LBAM in California and referencing the CDFA's own Final EIR.) The LBAM program has, however, injured the economic well being of California's farmers and nurserymen and weakened the credibility of, and public trust in, the CDFA and the state agencies that attempted to provide the CDFA with justification for its spray program.

Because we have not been able to review the final Strategic Framework, and we were assured that the DSF reflects the input of the sole public health representative on CISAC, we assume that the Framework's present form is not significantly different from the DSF. When we meet with you, we would like to present some more specific steps on which we can work together regarding the Framework and related issues, but we believe incorporation of the overall approach discussed in the next section below would strengthen the Framework, setting a direction for addressing invasive species that will be more effective and will ultimately make California agriculture more sustainable, healthier, and economically viable.

Sustainable Agriculture

We would very much like to work with you to encourage expansion of sustainable agriculture practices in the state both as a fundamental way of strengthening California's farms against invasive species damage and of providing many other health, environmental, and economic benefits. Other broad positive impacts of expanding sustainable agriculture, several of which are identified in the recent publication "California Agricultural Vision: Strategies for Sustainability,"¹ include: improving the safety of the food supply, the health of the state's residents and growers, and the health of the environment, particularly soil, water, and pollinators; mitigating global warming through carbon sequestration and reduced dependence of agriculture on fossil fuels;² creating jobs; strengthening California's reputation for environmental stewardship in agriculture; and reducing costs to farmers for chemical inputs.

¹ American Farmland Trust, California Department of Food and Agriculture, California State Board of Food and Agriculture. 2010. *California Agricultural Vision: Strategies for Sustainability*. December. <http://www.cdfa.ca.gov/agvision/>

² Lasalle, T., P. Hepperly. 2010. *Regenerative Organic Farming: A Solution to Global Warming*. Rodale Institute.


With regard to invasive species and the health of California agriculture, sustainable agriculture practices are possibly the best and most cost-effective tools for protecting farmers against both invasive species damage and global warming. There is mounting evidence that bio-diverse farms with healthy soil produce healthier, stronger plants more robust to pests, with yields equal to or greater than those from conventional agricultural practices.³ Supporting farmers to undertake these approaches would be an excellent use of invasive species funding and resources. In addition, California's invasive species programs could, according to much scientific testimony in recent years, benefit from updated scientific approaches. Invasive species money could be allocated to researching and encouraging less-chemical-dependent practices. Quarantines and chemical control/eradication programs are costly both to the state and to farmers and create a repeating cycle of chemical use for the same pests, which has cumulative negative impacts on human and environmental health and the safety of the food supply. In short, California's present invasive species programs are not based upon current science. The LBAM program is one example; the National Academies of Science report on the LBAM program⁴ and the criticisms of leading scientists in testimony to the state legislature make clear the lack of scientific basis for the classification of that insect as well as the government's response to it.

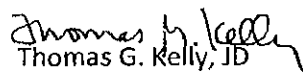
The CISAC Strategic Framework does little or nothing to shift pest programs toward prevention. It omits what we believe would be the most effective recommendation: encouraging a shift to sustainable agriculture as the best approach to introduced species control, making farms resilient from the soil up and giving farmers safe tools to use when the occasional pest poses a serious threat. Just as in health care, prevention is cheaper and more effective than costly, invasive treatments; making farms diverse, sustainable, and robust to pest infestation is a win-win strategy. We look forward to working with you on specific initiatives to meaningfully support this approach.

We appreciate your rapid response to our request for a meeting and are very much looking forward to meeting with you in April and discussing these issues.

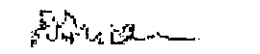
Thank you for your consideration.

On behalf of STOP THE SPRAY EAST BAY (eastbayinfo@stopthespray.org)


Nan Wishner
Albany & Callahan


Thomas G. Kelly, JD
Berkeley

On behalf of MOTHERS OF MARIN AGAINST THE SPRAY (MOMAS) (mothersofmarin@yahoo.com)


Debbie Friedman, JD
Mill Valley

³ See, for example: UN Green Economy Program. 2011. *Agriculture: Investing in Natural Capital*.

<http://www.unep.org/greeneconomy/GreenEconomyReport/tabid/29846/Default.aspx>;

Vasilikiotis, C. Can Organic Farming Feed the World? http://www.cnr.berkeley.edu/~christos/articles/cv_organic_farming.html;

⁴ National Research Council of the National Academies of Science. 2009. *Review of the U.S. Department of Agriculture's Animal and Plant Health Inspection Service Response to Petitions to Reclassify the Light Brown Apple Moth as a Non-Actionable Pest*. Washington DC: National Academies Press. August.

Attachment: Record Evidencing No Damage by LBAM

cc: Governor Jerry Brown (fax 916/ 558-3160)

Secretaries appointed to the ISCC -

- Secretary John Laird, California Natural Resources Agency (fax 916/653-8102, secretary@resources.ca.gov)
- Secretary Linda S. Adams, California Environmental Protection Agency (fax 916/324-0908, ladams@calepa.ca.gov)
- Secretary Dale E. Bonner, California Business, Transportation and Housing Agency (fax 916/323-5440, Agency.secretary@bth.ca.gov)
- Secretary Diana S. Dooley, California Health and Human Services Agency (fax 916/654-3343, c/o mcamposv@chhs.ca.gov)
- Acting Secretary Mike Dayton, California Emergency Management Agency (fax 916/845-8511, c/o terri.evans@calema.ca.gov)

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Senator Juan Vargas	(fax 916/327-3522)
Senator Lois Wolk	(fax 916/323-2304)

Assembly Committee on Agriculture -

Assemblymember Cathleen Galgiani	(email Assemblymember.Galgiani@assembly.ca.gov)
Assemblymember David G. Valadao	(email Assemblymember.Valadao@assembly.ca.gov)
Assemblymember Bill Berryhill	(email Assemblymember.Bill.Berryhill@assembly.ca.gov)
Assemblymember Jerry Hill	(email Assemblymember.Hill@assembly.ca.gov)
Assemblymember Fiona Ma	(email Assemblymember.Ma@assembly.ca.gov)
Assemblymember Tony Mendoza	(email Assemblymember.Mendoza@assembly.ca.gov)
Assemblymember Kristin Olsen	(email Assemblymember.Olsen@assembly.ca.gov)
Assemblymember Henry T. Perea	(email Assemblymember.Perea@assembly.ca.gov)
Assemblymember Mariko Yamada	(email Assemblymember.Yamada@assembly.ca.gov)

Office of Senator Joe Simitian (c/o Alan.Gordon@sen.ca.gov)

Office of Senator Loni Hancock (c/o Hans.Hemann@sen.ca.gov)

Office of Assemblymember Tom Ammiano (c/o misa.yokoi-shelton@asm.ca.gov)

Office of Assemblymember Mary Hayashi (c/o marina.wiant@asm.ca.gov)

Office of Assemblymember Jerry Hill (c/o tony.marino@asm.ca.gov)

Office of Assemblymember Jared Huffman (c/o dan.okenfuss@asm.ca.gov)

Office of Assemblymember Bonnie Lowenthal (c/o lauren.robinson@asm.ca.gov)

Office of Assemblymember Fiona Ma (c/o hillary.thomas@asm.ca.gov)

Office of Assemblymember William W. Monning (c/o kathy.smith@asm.ca.gov)

Office of Assemblymember Nancy Skinner (c/o michael.bedard@asm.ca.gov)

Office of Assemblymember Sandré Swanson (c/o amy.alley@asm.ca.gov)

Assemblymember Rich Gordon (email Assemblymember.Gordon@assembly.ca.gov)

Assemblymember Jim Nielsen (email Assemblymember.Nielsen@assembly.ca.gov)

RECORD EVIDENCING NO DAMAGE BY THE LIGHT BROWN APPLE MOTH IN CALIFORNIA

Declaration of Emergency by the CDFA and Subsequent Admissions by the CDFA of No Damage by LBAM as well as its Earlier Arrival (by 6-7 years) in the U.S.

1. October 2007

CDFA declares its own State of Emergency, claiming that the Light Brown Apple Moth (LBAM) has just arrived in the U.S. and that it had to be destroyed immediately before it devastated our crops.

2. Fall 2007

The CDFA sprays Santa Cruz and Monterey Counties with an untested, registered pesticide. Numerous scientists point out that LBAM could not have spread as far as it had in the State of California if it were a recent arrival.

3. April 24, 2008 – Court Case 158516

Hon. Paul P. Burdick of the County of Santa Cruz and City of Santa Cruz issues a ruling against the CDFA regarding its LBAM spray program. Based on the CDFA's admission during the court case that there was NO damage from LBAM, the court ruling includes this paragraph:

5) Respondents' issuance of the October 3, 2007, Notice of Exemption, and the underlying determination that the Project comes within the confines of the statutory emergency and categorical exemptions to CEQA, constitute a prejudicial abuse of discretion under Public Resources Code section 21168.5.

4. May 2008

In an appearance on the Angie Coiro radio show, Secretary Kawamura acknowledges that the moth has been here 6-7 years. This in contradiction to his declaration of emergency and repeated statements of dire threat due to the sudden arrival of the moth in California. The admission should have had a major impact on the CDFA's spray program. It did not.

Timeline Regarding Alleged Damage to Watsonville Berry Fields by the Light Brown Apple Moth (LBAM)

1. May 2009

USDA inspectors discover alleged LBAM damage in 3 Watsonville berry fields.

2. June 16, 2009

Mercury News reports on the story under the headline "Blackberry grower takes loss from light brown apple moth". Article alleges a 20% crop loss caused by LBAM. Article includes confirmation of the May 2009 discovery date *"Officials have released little information about the incident. Though USDA inspectors discovered the problem in May during cooler inspections, it came to light after an agricultural official posted it on his blog earlier this month."*

Story: By DONNA JONES, Posted: 06/16/2009 01:30:11 AM PDT -

http://www.mercurynews.com/centralcoast/ci_12598120?nclick_check=1

3. June, July, August 2009 ... and continuing until today

Additional media outlets, agricultural interests, and other parties repeat the allegations about serious damage caused by LBAM to Watsonville berry fields. This despite the fact that there is no evidence that the berry field damage was caused by LBAM and not by any one of the native California leaf roller moths.

4. July 2009 (approx. 2 months after the first report of berry damage in Watsonville)

CDFA confirms via its own "Light Brown Apple Moth Eradication Program Draft PEIR" that "no direct crop damages have been experienced to date in areas subject to existing infestation". See:

http://www.cdfa.ca.gov/phpps/LBAMEir/CH%203_Ag%20&%20Econ.pdf

Relevant paragraph:

3.2.3.2 Effects on Agricultural Revenues (Crop Damages)

The No Program Alternative assumes no LBAM Eradication Program and that existing LBAM control measures implemented by individual producers would continue. Based on the continued presence of LBAM in the primary Program Area and proliferation to other parts of the state, it is anticipated that LBAM would ultimately cause direct damages to host crops; no direct crop damages have been experienced to date in areas subject to existing infestation (Roach, pers. comm., 2009b).

5. September 23, 2009

Contra Costa County Agricultural Commissioner, Vincent L. Guise, submits a letter (ref. L-CCCo) to the CDFA (in connection with the Final PEIR) including the following statements:

"In the heaviest infested area of Point Richmond we noticed very significant damage to native plants that are growing in a natural chaparral/forested/grassland area that is approximately 500 acres in size. Larva samples were submitted to the CDFA lab, see PDR #1503041. I have enclosed a disc with a scanned copy of the PDR, associated pictures of the larva that were submitted from the listed hosts, pictures of the host area environment where the samples were collected and two short movie videos of collected larva." *

and

"The worst damage was to California toyon, *Heteromeles arbutifolia*, where there was severe brooming of the growing tips as a response to the feeding damage from LBAM larva on the terminal growth. As a result of this damage there was almost no flowering or subsequent berry production. There was also damage to wild blackberry fruit, pine and ceanothus. Beyond the damage to the foliage, the lack of production of berries especially on toyon is of great concern because this is a major source of food to wildlife, especially to native birds."

See:

[http://www.cdfa.ca.gov/phpps/LBAMeir/Final%20PEIR CH%203%20Agencies FEB2010 WEB.pdf](http://www.cdfa.ca.gov/phpps/LBAMeir/Final%20PEIR%20CH%203%20Agencies%20FEB2010%20WEB.pdf)

*** Court records, now part of the discovery process in our lawsuit, show that this alleged LBAM damage was erroneous as the lab reports on those larvae ultimately proved that they were not LBAM.**

March 16, 2011



March 21, 2011

Dear Governor Brown and Secretary Ross,

I am very concerned about the fact that a PEIR (Programmatic Environmental Impact Report) for the California Dept. of Food and Agriculture is being prepared that will obtain advanced approval for activities that we, the public, will have no way of reviewing and deciding upon before governmental action, and that may, in fact, do great harm to us and the environment.

To cut off open debate and input and not inform the public in specific ways and with clear details what the specifics are in using the CDFA's power to eradicate what it deems harmful species, and its control policiesin other words....to give them a blank check to move forward, is not in my interest as a citizen or in the interest of the public at large.

I ask that you stop this process and allow a process that enables citizens like myself to know, in advance, what plans are being made to control and/or eradicate invasive species and gives all of us the time to investigate and respond to the CDFA's plans.

Thank you and I would appreciate a response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn MacMichael".

Lynn MacMichael

3812 F Happy Valley Rd.

Lafayette, Ca. 94549

Shopping List

March 21, 2011



Dear Secretary Ross:

Pls. stop this
Impact Report. It
is unfair and
does not give the
residents adequate
voice in decision
making.

I am in the
process of going to
Colma City Council
and San Mateo
County for a resolution
to stop this unfair
Report. I will send

(over)



Shopping List



a 31 name
petition of Voters
that are not in
favor of this
PEIR.

Thanks for
your help.

Shawn

(650) 355-7107

Please have a rep. call
me so we can talk
about a new plan.

Thanks



03/24/2011 11:17 5116118813

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
fax: 916/653-4723
email: secretary.ross@cdfa.ca.gov

Governor Jerry Brown
State Capitol Suite 1173
Sacramento CA 95814
Fax: 916-558-3160
email at: <http://gov.ca.gov/contact.php>

Dear Governor Brown and CDFA Secretary Ross:

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:

1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a *specific* project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.

This PEIR's strategy, to evaluate in advance the environmental impacts of various treatments, denies the public the right to information and participation guaranteed by CEQA. Attempting to approve a pest control method now that might not be applied in a community until years in the future does not give residents adequate voice in the decision regarding its use in their neighborhoods.

3) Spending tax money on a two-year process for a consultant to prepare document that would thwart the basic requirements of CEQA and that is almost certain to result in a lawsuit would be unconscionable at any time but particularly now when the state budget and essential programs and services are being dramatically cut.

The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,

~~YOUR NAME AND ADDRESS~~



Jay Haley
4251 Montgomery #5
Oakland, CA 94611

3/24/11

Dear Governor Brown and CDFA Secretary Ross:

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Sincerely,



Governor Jerry Brown
State Capitol, Suite 1173
Sacramento CA 95814
Fax: 916-558-3160
email at: http://gov.ca.gov/m_contact.php

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
fax: 916/653-4723
email: secretary.ross@cdfa.ca.gov

1402 Bancroft Way
Berkeley, CA 94702
March 17, 2011

Dear Governor Brown and CDFA Secretary Ross:

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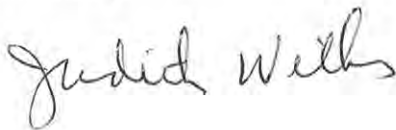
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Sincerely



Judith Wilkes

Dear Governor Brown and CDFA Secretary Ross:

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:


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The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,


132 Hamilton Ct
Los Altos, Ca 94022
650 9413058

Rec'd 3.28.11
rmm

Dear Governor Brown and CDFA Secretary Ross:

I am asking you to immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's future invasive species eradication and control programs in California for the following reasons:

1) A PEIR such as this, which attempts to obtain advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a *specific* project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.

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The approach proposed in this PEIR is the same as used by CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this attempt to extend a costly and ill-conceived strategy.

Sincerely,



This PEIR denies the public right to information and is costly and unnecessary.

Thanks



Ted Luehs
1107 Crespi Dr
Pacifica, CA 94044

Rec'd 3-28-11
mw



Governor Jerry Brown
State Capitol, Suite 1173
Sacramento CA 95814
Fax: 916-558-3160
email at: http://gov.ca.gov/m_contact.php

Secretary Karen Ross
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
fax: 916/653-4723
email: secretary.ross@cdfa.ca.gov

Dear Governor Brown and CDFA Secretary Ross:

Please immediately stop the process of preparing a Programmatic Environmental Impact Report (PEIR) for the California Department of Food and Agriculture's (CDFA) future invasive species eradication and control programs in California for the following reasons:

A PEIR such as this, which obtains advance approval for actions at unspecified future places and times, violates basic requirements of the California Environmental Quality Act (CEQA), which mandates that a PEIR must have a 'specific' project description, location, and time frame to allow the public and decision makers to make informed judgments about the project's environmental impacts.

Given the CDFA's previous actions to 'exterminate' so many species over and over again, and their utterly misguided effort to exterminate the light brown apple moth, any attempt to approve these processes in advance is equally misguided. This PEIR would institutionalize the actions of the CDFA without administrative or public input.

It is ridiculous to approve in advance a pest control action whose consequences could be problematic.

It is wasteful to spend tax money on this as you will surely be set upon with lawsuits by better informed environmental organizations.

The approach proposed in this PEIR is the same as used by the CDFA in the light brown apple moth (LBAM) PEIR, which is currently being challenged in two lawsuits. I ask you to stop this costly and ill-conceived strategy.

Sincerely,

A handwritten signature in blue ink that reads "Dennis L. Knepp". The signature is fluid and cursive.

Dennis L. Knepp
2 White Tail Lane
Monterey, CA 93940

Merry Wells

From: Carol Tate on behalf of Karen Ross, Secretary
Sent: Wednesday, March 30, 2011 11:36 AM
To: Merry Wells
Subject: PEIR

From: Janis Knepp [<mailto:janisknepp@comcast.net>]
Sent: Wednesday, March 30, 2011 11:35 AM
To: Karen Ross, Secretary
Subject: PEIR

Stop the PEIR. We certainly hope you are cut from a different ilk than the infamous Kawamura, but alas, your appointment must have been favored by those lobbyists who benefit from CDFA's immoral policies. We learned too, too much about the purpose of CDFA – to line the pockets of the wealthy industrial agriculturists, robbing the taxpayers with every “bug of the month” declaration and endangering our democracy, solvency, and environmental health.

CDFA is a front organization for the very wealthy wine and industrial ag growers, imposing restrictions and advantages for them. It is a sham and a shame. How sad for the public and the environment. Stop hanging all of those damn traps all up and down California and employing those bullies who do so at the expense of the taxpayer. CDFA has negatively impacted the health of many. The public has a right to know with labeled GM products, also. What a shame we have lost what the European public still has - some clout over the wealthy who have captured our legislators and appointed officials.

Please send a resume' of your background qualifications for this post. Our local ag official's first step was to “get up to step on the invasive species” issue (i.e., how to get taxpayer money for his ag friends) and to ask for further water waivers, just what you guys are put in positions to accomplish. Ms Knepp

July 7, 2011

To: Cliff Rechtschaffen
California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

From: Michael Boitano
Amador County Agricultural Commissioner
12200-B Airport Road
Jackson Ca 95642

Ref: Notice of Preparation for the Statewide Plant Pest Prevention and
Management Program Environmental Impact Report.

Dear Sir:

My name is Mike Boitano. I am the Agricultural Commissioner in Amador County. I stand before you today in support of the Environmental Impact Report that CDFA is now in the process of completing.

I'm also here to encourage CDFA to include terrestrial noxious and invasive weeds in the EIR. Due to budget cutbacks, CDFA has done away with all infrastructures that dealt with weeds. Weed management areas and local county weed programs will now be left without a secure funding source or expertise. Weed management groups are not a new concept but have proven themselves as one that has truly been a tremendous success. The concept of bringing many people with many different backgrounds to the table to deal with noxious or invasive weeds has proven to work. It is the hope of many that CDFA will be able to reconstruct some sort of weed program in the future.

There are counties within the state that have had long-standing weed programs. Amador County has had a continuous weed program for the last 80+ years. It is vital that those counties that can and are willing to continue with these local weed programs must be allowed to do so. We need your help; the document you are about to prepare and get certified needs to include those local noxious and invasive weed programs.

The use of chemicals to control invasive and noxious plants and insects is not a new concept. California has the most stringent laws pertaining to the use of pesticides in the world. While we all strive to lessen the impacts of pesticides on the environment, we find that pesticides used to control these invasive are an integral part of the Integrated Pest Management program. County and weed management areas all use the integrated pest management approach to control invasive plants and insects.

Noxious and invasive weeds are a constant threat to the environment of California. In the heavily farmed areas of the state we do not see the rise or the size of infestations that we can find in nonproduction areas. How many of us have walked down along a river or creek or around a lake and had to change our path because of yellow starthistle? How many areas do we have in the state that has been taken over by noxious weeds that are crowding out natural vegetation? What is the fire danger created by large noxious weeds? I can show you what happens when you allow a stand of Salt Cedar to get established along a creek. (These plants can use up to 300 gallons of water a day). Pesticides are a needed tool in the control of both invasive plants and insects. Please allow us to use these tools.

I would like to leave you with a poem that was written by Patrick J. Griffin, Siskiyou County Agricultural Commissioner. I think it sums up what we are all feeling.

The Silent Invasion

They come by day, they come by night
Taking our land without a fight
They come from near, they come from far
They stick to your shoes and ride on your car
They fight with persistence and show no fear
Claiming millions of acres in just one year
They have no natural enemies in this new land
It's an easy battle and victory is at hand

In conclusion, I would like to state that we in the agricultural departments throughout the state have always considered weeds a major problem. We have worked on them through the good and the bad times. We are now asking that you remember the **outstanding** work that has been done both by the counties and the weed management's groups and give us the tools we need to continue this fight.

I would like to restate that I am very supportive of this effort and will make myself available if you have any questions. My email address is mboitano@amadorgov.org and my phone number is 209-223-6481.

Department of Agriculture/Weights and Measures



COUNTY OF SAN MATEO

BOARD OF SUPERVISORS

Dave Pine
Carole Groom
Don Horsley
Rose Jacobs Gibson
Adrienne Tissier

Fred W. Crowder
Agricultural Commissioner
Sealer of Weights & Measures

728 Heller Street • P.O. Box 999 • Redwood City, California 94064-0999 • (650) 363-4700 • FAX 367-0130 • www.co.sanmateo.ca.us/agwm

July 8, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Regarding: California Department of Food and Agriculture's (CDFA) Notice of Preparation for a Statewide Plant Pest Prevention and Management Program EIR.

Dear Governor Brown:

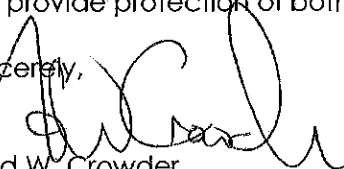
As the Agricultural Commissioner for San Mateo County I support CDFA's efforts to develop a programmatic Environmental Impact Report (EIR) to serve as a guide for the control and management of exotic invasive species in California.

The San Mateo County Agricultural Commissioners Office inspects incoming agricultural shipments at the San Francisco International Airport as well as other locations in San Mateo County and in some years our staff has intercepted over a thousand exotic pests on shipments. These pests have the potential to impact not only agriculture in San Mateo, but agricultural, residential, and native plant and animal community's through-out California. The EIR would provide the response blue-print should an exotic invasive species be introduced thereby facilitating quick and appropriate response; should eradication be necessary, it would ensure the goals of the eradication project are clear and that the project proceeds with minimal impacts and in accordance with State and federal law.

The development of the EIR will involve five public scoping meeting as well as a web based meeting to ensure transparency and thorough public input. The document will also be routinely reviewed and updated, with public participation, to ensure it is up-to-date, relevant, and relies on the latest pest management methods and developments.

Such a document would help those responsible for pest prevention and eradication to implement this program in compliance with California's Environmental Quality Act. Such anticipatory planning and creation of such a management plan is integral to an Integrated Pest Management (IPM) approach to pest control. This will facilitate the management or eradication of pest populations utilizing least toxic, yet effective pest control methods. Such an approach will provide protection of both our agricultural and natural resources while minimizing impacts.

Sincerely,


Fred W. Crowder
Agricultural Commissioner / Sealer
San Mateo County



County of Santa Cruz

OFFICE OF THE AGRICULTURAL COMMISSIONER

KEN CORBISHLEY
AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS AND MEASURES
DIRECTOR, MOSQUITO AND VECTOR CONTROL

July 8, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

RE: California Department of Food & Agriculture's (CDFA) Notice of Preparation for a Statewide Plant Pest Prevention and Management Program EIR.

Dear Governor Brown:

As you know, the California Department of Food and Agriculture is preparing an Environmental Impact Report (EIR) for a Statewide Plant Pest Prevention and Management Program. The overall goal of this statewide program is to create a vehicle which provides a time-sensitive and efficient framework for evaluating potential environmental impacts of the various pest management activities implemented by CDFA and its partners.

I think it is important to note that the Program EIR will focus on management strategies rather than individual pests, analyzing each for their advantages and disadvantages, including alternatives that may result in fewer impacts and necessary mitigation measures.

The EIR will be a comprehensive document based on Integrated Pest Management principles. This in turn will provide for a strong scientific and technical foundation for an open decision making process when invasive pests are discovered. Public participation during the EIR development will be actively solicited through five scoping meetings and a web based meeting; this effort will strengthen the final document and provide for the highest level of transparency as it is developed. The final product will also include an ongoing process to evaluate and include new developments and potential environmental impacts while providing for continued public participation throughout the ongoing pest management process.

This tool will help those responsible for pest prevention to implement effective programs in full compliance with California Environmental Quality Act. We will also be able to better protect the economic vitality of our food system, protect jobs for many in economically depressed areas of the State, and protect California's unique environment.

Sincerely,

Mary Lou Nicoletti
Acting Agricultural Commissioner

**CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE:
STATEWIDE PLANT PEST PREVENTION AND MANAGEMENT PROGRAM**

Draft EIR- CEQA Scoping Comment Form

RECEIVED

Name:	David Brown	JUL 12 2011
Group/Organization (optional):		
Mailing Address:	8631 Bond Rd EG Ca 95624	OFFICE OF THE CHIEF COUNSEL
Telephone No. (optional):		
Email (optional):	dabrown@ ^{sac} sac golomved.com	

Comments/Issues:	CDFA should expand the scope of this document to include livestock disease and pest prevention, and include other State Agencies (such as CDPH) in the process.
	Diseases include blue tongue, West Nile virus, Rift Valley Fever, Vesicular stomatitis virus, etc...

Please use additional sheets if necessary.

SUBMIT WRITTEN COMMENTS (POSTMARKED BY JULY 25TH, 2011) TO:

MAIL: California Department of Food and Agriculture
Attn: Michele Dias, Acting Chief Counsel
1220 N Street, Suite 400
Sacramento, CA 95814

EMAIL: PEIR.info@cdfa.ca.gov

Questions? Please email us or visit our website: www.cdfa.ca.gov/go/peir

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: FYI: Comment from PEIR web page
Date: Tuesday, July 12, 2011 12:37:06 PM

From: Linda Haque [\[mailto:lhaque@earthlink.net\]](mailto:lhaque@earthlink.net)
Sent: Tue 7/12/2011 12:25 PM
To: Pest PreventionEIR
Subject: Input

Michelle,

I am a member of the California Avocado Growers with a small avocado acreage as well as being a citrus grower. I learned of your program through a CAC publication. I would like to offer some input to the CDFA if the State is planning to set up an "overseer" group for pest detection and management similar to the group overseeing the threat of the Asian Citrus Psyllid (ACP) to California citrus, the CPDPP. I believe that the Citrus Pest and Disease Prevention Program model is a highly efficient manner to address pest threats by having one central group overseeing State action as regards flora pests, specifically, with that group being composed of a cross section of those people most threatened by such pests.

My specific suggestion would be to explore early on how different groups could be utilized to get word of the threat out to the general public in a coordinated manner.

While I have no authority to speak on behalf of the Master Gardeners, I believe the mission of the Master Gardeners is "to enhance the well-being of people, plants, and the environment through science-based gardening education and community outreach." In Ventura County the Master Gardeners have been active on several fronts in trying to get the word out to homeowners and the general community on the threat, detection, and proper notification to the State as regards the dreaded ACP threat. While the CPDPP is primarily concerned with the commercial grower, they realise the critical role played by home gardeners in the ACP threat. I believe there are other volunteer channels that could be of help as well. My point being that one may be able to draw on past experiences if the goals of this new program are the same as those of the CPDPP. In times of tough financial times for all, while the pest threats have not diminished, the volunteer route, guided by sound scientific principles, may prove especially useful.

Thank you for your time.

Linda Haque



Tulare County Agricultural Commissioner/Sealer

2/18/11
Marilyn Kinoshita, Agricultural Commissioner
Sealer of Weights and Measures
Stevie McNeill, Assistant
Commissioner/Sealer

July 12, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

RE: California Department of Food & Agriculture's (CDFA) Notice of Preparation for a Statewide Plant Pest Prevention and Management Program EIR.

Dear Governor Brown:

On behalf of the California Agricultural Commissioners and Sealers Association, I am writing to express our strong support for the CDFA's effort to develop a comprehensive and scientifically based Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR). Agricultural Commissioners throughout the state share the responsibility with CDFA to prevent the movement of destructive, invasive pests into and around the state in order to protect our food system and California's natural resources.

The EIR will be a comprehensive document based on Integrated Pest Management principles. This in turn will provide for a strong scientific and technical foundation for an open decision making process when invasive pests are discovered. Public participation during the EIR development will be actively solicited through five scoping meetings and a web based meeting. This effort will strengthen the final document and provide for the highest level of transparency as it is developed. The final product will also include an ongoing process to evaluate and include new developments and potential environmental impacts while providing for continued public participation throughout the ongoing pest management process.

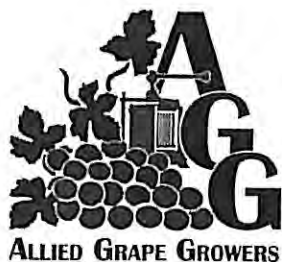
This tool will help those responsible for pest prevention to implement effective programs in full compliance with California Environmental Quality Act. We will also be able to better protect the economic vitality of our food system, protect jobs for many in economically depressed areas of the State, and protect California's unique environment.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn Kinoshita".

Marilyn Kinoshita
Tulare County Agricultural Commissioner/
Sealers of Weights and Measures

Cc: Karen Ross, Secretary of Agriculture
Cc: Michele Dias, Acting Chief Counsel, CDFA



QUALITY

INTEGRITY

STABILITY

July 14, 2011

Governor Jerry Brown
ATTN: Alexis Wilson
Office of the governor
State Capitol
Sacramento, CA 95814

Re: CDFA Environmental Impact Report for a Statewide Plant Pest Prevention and Management Program

Dear Governor Brown,

On behalf of Allied Grape Growers, a winegrape marketing cooperative representing nearly 600 grower-members throughout California since 1951, I applaud the California Department of Food and Agriculture for taking a bold and necessary step to prepare California for current and future threats to Agriculture from invasive pests.

A substantial environmental review of treatment methods for invasives will provide necessary analysis of current defense mechanisms for our integral food system. The thorough review and refinement of management strategies will strengthen the state's preparedness for invasive pest threats. We must move beyond the status quo, which focuses on individual pests and formulating subsequent responses, because of the destructive nature of invasive pests and the importance of timing in responding quickly to prevent damage.

Preventing the establishment of invasives and promoting the production of a safe, secure food supply are key elements to supporting a healthy California agriculture. I encourage your support of the effort's development and recognition of how the program EIR will foster a timelier and adequate invasive pest management response.

Sincerely,

Nat DiBuduo
President CEO

cc: Barry Bedwell

Executive Office
7030 N. Fruit Ave.
Suite 115
Fresno, CA 93711
Tel: 559-276-7021
Fax: 559-276-7129

North Coast Office
347 Healdsburg Ave.
Suite J
Healdsburg, CA 95448
Tel: 707-433-6525
Fax: 707-433-1354



GLENN COUNTY BOARD OF SUPERVISORS

Willows Memorial Hall, 2nd Floor
525 West Sycamore Street, Suite B1
Willows, CA 95988

John K. Viegas, District 1
Dwight Foltz, District 2
Steve Soeth, District 3
Michael Murray, District 4
Leigh W. McDaniel, District 5

August 18, 2011

The Honorable Jerry Brown
Governor of the State of California
State Capitol, Suite 1173
Sacramento, CA 95814

**RE: California Department of Food & Agriculture's (CDFA) Notice of Preparation for a
Statewide Plant Pest Prevention and Management Program EIR**

Dear Governor Brown:

On behalf of the Glenn County Board of Supervisors, we are writing to express our strong support for the CDFA's effort to develop a comprehensive and scientifically based Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR). We share an interest in preventing the movement of destructive, invasive pests into and around the state in order to protect our food system and California's natural resources.

The Program EIR will be a comprehensive document based on integrated Pest Management principles. This in turn will provide for a strong scientific and technical foundation for an open decision making process when invasive pests are discovered. Public participation during the EIR development has been actively solicited through five scoping meetings and a web based meeting. This effort will strengthen the final document and provide for the highest level of transparency as it is developed. The final product will also include an ongoing process to evaluate and include new developments and potential environmental impacts while providing for continued public participation throughout the ongoing pest management process.

This tool will help those responsible for pest prevention to implement effective programs in full compliance with California Environmental Quality Act. We will also be able to better protect the economic vitality of our food system, protect jobs for many in economically depressed areas of the State, and protect California's unique environment.

Sincerely,

GLENN COUNTY BOARD OF SUPERVISORS

A handwritten signature in black ink, appearing to read "Steve Soeth".
Steve Soeth, Chairman

cc: Karen Ross, Secretary of Agriculture

~ The County of Glenn is an Equal Opportunity Provider ~



GLENN COUNTY BOARD OF SUPERVISORS

Willows Memorial Hall, 2nd Floor
525 West Sycamore Street, Suite B1
Willows, CA 95988

John K. Viegas, District 1
Dwight Foltz, District 2
Steve Soeth, District 3
Michael Murray, District 4
Leigh W. McDaniel, District 5

August 18, 2011

The Honorable Jerry Brown
Governor of the State of California
State Capitol, Suite 1173
Sacramento, CA 95814

**RE: California Department of Food & Agriculture's (CDFA) Notice of Preparation for a
Statewide Plant Pest Prevention and Management Program EIR**

Dear Governor Brown:

On behalf of the Glenn County Board of Supervisors, we are writing to express our strong support for the CDFA's effort to develop a comprehensive and scientifically based Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR). We share an interest in preventing the movement of destructive, invasive pests into and around the state in order to protect our food system and California's natural resources.

The Program EIR will be a comprehensive document based on integrated Pest Management principles. This in turn will provide for a strong scientific and technical foundation for an open decision making process when invasive pests are discovered. Public participation during the EIR development has been actively solicited through five scoping meetings and a web based meeting. This effort will strengthen the final document and provide for the highest level of transparency as it is developed. The final product will also include an ongoing process to evaluate and include new developments and potential environmental impacts while providing for continued public participation throughout the ongoing pest management process.

This tool will help those responsible for pest prevention to implement effective programs in full compliance with California Environmental Quality Act. We will also be able to better protect the economic vitality of our food system, protect jobs for many in economically depressed areas of the State, and protect California's unique environment.

Sincerely,

GLENN COUNTY BOARD OF SUPERVISORS

A handwritten signature in blue ink, appearing to read "Steve Soeth", is written over a horizontal line.

Steve Soeth, Chairman

cc: Karen Ross, Secretary of Agriculture

~ The County of Glenn is an Equal Opportunity Provider ~



TOWN OF FAIRFAX

142 BOLINAS ROAD, FAIRFAX, CALIFORNIA 94930
(415) 453-1584 / FAX (415) 453-1618

July 7, 2011

Mayor
Larry Bragman

Vice Mayor
Pam Hartwell-Herrero

Town Council
John Reed
Lew Tremaine
David Weinsoff

Town Manager
Michael Rock

Governor Jerry Brown
State Capitol, Suite 1173
Sacramento, CA 95814

BY FACSIMILE AND U.S. MAIL: (916) 558-3160

Re: CDFA PEIR

Dear Governor Brown:

I am writing to request that you invoke your executive authority to halt the Statewide Pest Prevention Programmatic Environmental Impact Report (PEIR) process that the California Department of Food and Agriculture recently launched.

The Pest Prevention PEIR is costly and, if approved will make it impossible for the public to have a meaningful voice in state pesticide spray decisions affecting our communities. The PEIR is based on an outdated model of pest management that relies too heavily on pesticides, creates unacceptable health risks, and unnecessarily burdens our small and organic farmers.

CDFA's last effort to invoke a top down pesticide spray order with the Light Brown Apple Moth (LBAM) demonstrated serious problems with its public process and research methodology. CDFA failed to conduct a thoroughgoing review of the epidemiological impact of aerial spraying over densely populated urban areas and its threat evaluation of the LBAM was eventually shown to be a sham.

The future of California agriculture and the credibility of CDFA would be far better served by undertaking a much less costly planning process to update the State's pest programs using current independent science. It's time for California to embrace sustainable agricultural practices and abandon outmoded chemically dependent pest eradication programs.

Your independent judgment is needed to redirect this wasteful program.

Respectfully yours,


LARRY BRAGMAN

This letter represents the personal viewpoint of the Council member who signs it and does not necessarily represent an official position of the Town of Fairfax.

Rio Blanco Farms

1998 ROAD 152

DELANO, CALIFORNIA 93215

661 / 792-3151

July 14, 2011

Governor Jerry Brown
Attn: Alexis Wilson
Office of the Governor
State Capitol
Sacramento, CA 95814

Re: CDFA Environmental Impact Report for a Statewide Plant Pest Prevention and Management Program

Dear Governor Brown,

I applaud the California Department of Food and Agriculture for taking a bold and necessary step to prepare California for current and future threats to Agriculture from invasive pests.

A substantial environmental review of treatment methods for invasives will provide necessary analysis of current defense mechanisms for our integral food system. The thorough review and refinement of management strategies will strengthen the state's preparedness for invasive pest threats. We must move beyond the status quo, which focuses on individual pests and formulating subsequent responses, because of the destructive nature of invasive pests and the importance of timing in responding quickly to prevent damage.

Preventing the establishment of invasives and promoting the production of a safe, secure food supply are key elements to supporting a healthy California agriculture. I encourage your support of the effort's development and recognition of how the program EIR will foster a timelier and adequate invasive pest management response.

Sincerely,



Andrew Zaninovich

Sunview Shandon

1998 ROAD 152

DELANO, CALIFORNIA 93215

661 / 792-3151

July 14, 2011

Governor Jerry Brown
Attn: Alexis Wilson
Office of the Governor
State Capitol
Sacramento, CA 95814

Re: CDFA Environmental Impact Report for a Statewide Plant Pest Prevention and Management Program

Dear Governor Brown,

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Preventing the establishment of invasives and promoting the production of a safe, secure food supply are key elements to supporting a healthy California agriculture. I encourage your support of the effort's development and recognition of how the program EIR will foster a timelier and adequate invasive pest management response.

Sincerely,



Marko S. Zaninovich



County of Fresno

DEPARTMENT OF AGRICULTURE

CAROL N. HAFNER

AGRICULTURAL COMMISSIONER/
SEALER OF WEIGHTS & MEASURES

July 14, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

RE: Department of Food & Agriculture's Notice of Preparation for a Statewide Plant Pest Prevention and Management Program Environmental Impact Report (PEIR)

Dear Governor Brown:

The need for a comprehensive, scientifically based, statewide pest prevention program continues as pest pressures from outside of the state's boundaries continue to bombard and threaten our economy and environment. Hand in hand with this need is the necessity for addressing California Environmental Quality Act (CEQA) requirements. The Notice of Preparation for the PEIR is the first critical step towards addressing a systematic approach to plant pest infestations.

The initial development of the PEIR will encompass the full breadth of pest management strategies and scientific tools currently available to address plant pest infestations beyond just chemical control. As I have witnessed in the recent European grapevine moth infestation in Fresno County, integrated pest management approaches including the physical removal of host material is proving to be another key element to the eradication of this pest.

As the future brings new techniques and management tools to the forefront, the PEIR would allow the addition of new strategies which would be open to review and comment by all interested parties which provides transparency and encourages feedback from stakeholders; it is designed to be a living document.

The development and implementation of the Statewide Plant Pest Prevention and Management Program Environmental Impact Report as a tool is long overdue. I strongly support the development of this report and look forward to its full implementation in the future.

Sincerely,

Carol N. Hafner
Agricultural Commissioner/Sealer of Weights and Measures

cc: Karen Ross, Secretary of Agriculture



Tulare County Agricultural Commissioner/Sealer

Marilyn Kinoshita, Agricultural Commissioner
Sealer of Weights and Measures
Stevie McNeill, Assistant
Commissioner/Sealer

July 12, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

RE: California Department of Food & Agriculture's (CDFA) Notice of Preparation for a Statewide Plant Pest Prevention and Management Program EIR.

Dear Governor Brown:

On behalf of the California Agricultural Commissioners and Sealers Association, I am writing to express our strong support for the CDFA's effort to develop a comprehensive and scientifically based Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR). Agricultural Commissioners throughout the state share the responsibility with CDFA to prevent the movement of destructive, invasive pests into and around the state in order to protect our food system and California's natural resources.

The EIR will be a comprehensive document based on Integrated Pest Management principles. This in turn will provide for a strong scientific and technical foundation for an open decision making process when invasive pests are discovered. Public participation during the EIR development will be actively solicited through five scoping meetings and a web based meeting. This effort will strengthen the final document and provide for the highest level of transparency as it is developed. The final product will also include an ongoing process to evaluate and include new developments and potential environmental impacts while providing for continued public participation throughout the ongoing pest management process.

This tool will help those responsible for pest prevention to implement effective programs in full compliance with California Environmental Quality Act. We will also be able to better protect the economic vitality of our food system, protect jobs for many in economically depressed areas of the State, and protect California's unique environment.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn Kinoshita".

Marilyn Kinoshita
Tulare County Agricultural Commissioner/
Sealers of Weights and Measures

Cc: Karen Ross, Secretary of Agriculture
Cc: Michele Dias, Acting Chief Counsel, CDFA



July 15, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

RE: Programmatic EIR for Plant Pest Prevention and Management

Dear Governor Brown:

I am writing on behalf of 1800 vineyard owners in Sonoma and Marin counties who have faced a series of invasive pests that are impacting profitable grape production in Sonoma County. Secretary Ross has proposed developing a programmatic Environmental Impact Report (EIR) for a Statewide Plant Pest Prevention and Management Program. We support this proposal because it will allow the state to have a more timely response to new invasive pest introductions. Time is of the essence in dealing with a new pest, and initiating an EIR after an invasion occurred is not working for our growers or California agriculture.

A comprehensive program based upon Integrated Pest Management principles will provide a science-based response to eradicate or manage the new pest while minimizing environmental impacts from the control program. I believe the program development and implementation can be transparent, effective and more efficient than the current process.

We ask that you will support CDFA in pursuing a programmatic EIR for plant pest introductions that threaten California agriculture.

Sincerely,

A handwritten signature in black ink that reads "Nick Frey". The signature is written in a cursive, slightly slanted style.

Nick Frey
President

Cc Karen Ross



COUNTY OF KINGS BOARD OF SUPERVISORS

KINGS COUNTY GOVERNMENT CENTER
1400 W. LACEY BOULEVARD, HANFORD, CA 93230
(559) 582-3211, EXT. 2362, FAX: (559) 585-8047
Web Site: <http://www.countyofkings.com>

JOE NEVES - DISTRICT 1
LEMOORE & STRATFORD

RICHARD VALLE - DISTRICT 2
AVENAL, CORCORAN & KETTLEMAN CITY

BOUG VERBOON - DISTRICT 3
NORTH HANFORD, ISLAND DISTRICT & NORTH LEMOORE

TONY BARBA - DISTRICT 4
ARMONA, HANFORD & NEW HOME GARDEN

RICHARD FAGUNDES - DISTRICT 5
HANFORD & HOME GARDEN

July 19, 2011

Governor Jerry Brown
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814

Re: CDFA's Statewide Program Environmental Impact Report [PEIR]
Kings County Board of Supervisors' SUPPORT

Dear Governor Brown:

From time-to-time invasive pests are introduced into the environment of California and when this happens the California Department of Food and Agriculture (CDFA) is called upon to protect this state's environment and food producing resources. It is imperative to initiate a quick response in order to effectively contain, reduce, and eventually remove the threat to our food producing resources and potential damage to the environment. CDFA is currently developing an Environmental Impact Report (EIR) for its statewide pest prevention and management program [Program]. We are told the Program EIR will be comprehensive and employ Integrated Pest Management (IPM) principles and provide a scientific and technical foundation for the Program's decision making for the management of invasive pests.

We believe a statewide PEIR will provide for more timely response to mitigate the impacts to our environment and our food producing resources when the introduction/detection of invasive pests are discovered in the future. We therefore respectfully request your support, along with ours, in the completion of this vital statewide Program Environmental Impact Report.

Thank you for this important consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Tony Barba", is written over a horizontal line.

Tony Barba, Board Chairman
Kings County Board of Supervisors

Cc: Karen Ross, Secretary of Food and Agriculture
Michele Dias, Acting Chief Counsel, CDFA
Tim Niswander, Agricultural Commissioner-Sealer, Kings County



CALIFORNIA DRIED PLUM BOARD

3840 Rosin Court
Suite 170
Sacramento, CA 95834

Phone (916) 565-6232
Fax (916) 565-6237
www.CaliforniaDriedPlums.org

July 21, 2011

The Honorable Jerry Brown
Governor, State of California
State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown:

On behalf of the California Dried Plum Board and its 920 growers and processors, I am writing in support of the California Department of Food and Agriculture's (CDFA) preparation of a Program Environmental Impact Report (PEIR) for a Statewide Plant Pest Prevention and Management Program.

California's agricultural and natural resource assets are a vital component of our economic, environmental and cultural composition. The California dried plum industry proudly represents a part of the multi-billion dollar bounty of specialty crops that make California one of the world's most important providers of safe and nourishing food, producing 99% of the domestic supply and 48% of the international supply of prunes with a farm gate value of \$154 million (2010). It is critical that we protect this food supply from the increasing threat of destructive pests and plant diseases.

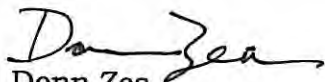
Unfortunately, as the challenge of managing these risks becomes more complicated, the time and cost investment to prepare environmental documentation becomes greater, even when decisive action is necessary to avoid an uncontrolled outbreak. As each new pest or disease is discovered, a regulatory process of planning, analysis, public input and review must begin again, exposing California agriculture to unnecessary environmental and financial risk. Ironically, the only solution to controlling the outbreak when delays exacerbate the problem is often more intensive use of chemicals and other measures that might have been avoided through a timely response.

As the responsible state agency for management and control of pest infestations and plant diseases, CDFA is creating this PEIR as a vehicle to provide a transparent, time-sensitive and efficient framework for evaluating potential environmental impacts of the various integrated pest management activities implemented by the agency and its partners. The PEIR will provide a comprehensive human health and ecological risk assessment, ultimately providing California Environmental Quality Act compliance for all CDFA pest prevention and management programs. The PEIR will employ the best scientific and technical information for decision making and seek expanded public participation with additional environmental analysis and comment. Ultimately, the

PEIR will enable responsible agencies and agricultural interests to deal most efficiently and cost-effectively with these increasing threats in a time of decreasing budgets and staff.

A vibrant California agricultural economy is too vital to leave to chance each time a potentially devastating pest or plant disease outbreak occurs. I urge you to support the Program Environmental Impact Report for Statewide Plant Pest Prevention and Management being prepared by the California Department of Food and Agriculture.

Sincerely,

A handwritten signature in cursive script, appearing to read "Donn Zea".

Donn Zea
Executive Director
California Dried Plum Board

cc: Secretary Karen Ross
CDPB Executive Committee
CDPB Production Research Subcommittee



Governor Jerry Brown
State Capitol, Ste. 1173
Sacramento, CA 95814
via fax: 916-558-3160

July 26, 2011

RE: Support for the Statewide Pest Prevention Draft Programmatic Environmental Impact Report (PEIR)

Dear Governor Brown:

This letter is in support of the Statewide Plant Pest Prevention and Management Programmatic Environmental Impact Report (PEIR) now being undertaken by the California Department of Agriculture (CDFA).

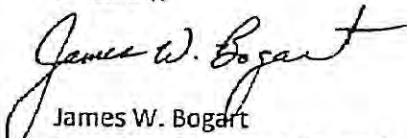
Prevention of the introduction and establishment of invasive plant pests, diseases and noxious weeds is a matter of extreme importance to the State. These pests can have serious economic consequences for agriculture and can also have severe consequences for the natural environment. This PEIR will create a framework for evaluating potential economic and environmental impacts of CDFA's pest prevention and management programs.

CDFA's pest prevention and management programs promote and maintain a safe and secure food supply, and minimize the impacts of invasive pests and diseases. This PEIR will support CDFA's goal of rapid response to new pests and streamline the implementation of new programs and the integration of new pest programs and control techniques.

This PEIR will help to ensure the safety of the public and the protection of the environment. The process will have ample opportunities for public input, including during additional environmental analysis that may be required in specific cases.

Please support the preparation of this draft PEIR.

Sincerely,



James W. Bogart
President & General Counsel



July 22, 2011

The Honorable Jerry Brown
Governor of California
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown:

I am the manager of the California Plum Marketing Board, which represents the state's 600 plum producers. On average, we export 22-25% of our annual crop of 10 million boxes to foreign markets. Invasive pests, when found in California, have a dramatic impact on our ability to export plums.

We urge your support for the California Department of Food and Agriculture's program Environmental Impact Report (EIR) for the Statewide Plant Pest Prevention and Management Program that is currently being prepared. The overall goal of this statewide program is to create a vehicle which provides a time-sensitive and efficient framework for evaluating potential environmental impacts of the various pest management activities implemented by CDFA and its partners. The Program EIR will focus on management strategies rather than individual pests, analyzing each for their advantages and disadvantages, including alternatives that may result in fewer impacts and necessary mitigation measures.

In May of 2010 when the European Grapevine Moth was discovered in Fresno County many of our producers were blocked from exporting plums to Mexico for several weeks. By the end of June 2010 we had only exported 33,395 boxes of plums to Mexico. This year by the end of June, we have exported 80,692 boxes of plums to Mexico. With this example you can see the effect an invasive pest find can have with a commodity, especially one that is very perishable such as plums.

Again, we urge your support for the program Environmental Impact Report for the Statewide Plant Pest Prevention and Management Program.

Sincerely yours,

Gary W. Van Sickle
Manager

cc: Mark Bybee, CPMB Chairman

via facsimile

California
Tree Fruit Agreement
PO Box 968, 975 "I" Street
Reedley, California 93654-0968
559.638.8260 PHONE
559.638.8842 FAX
www.caltreefruit.com



AGRICULTURAL COMMISSION

311 Fair Lane
Placerville, CA 95667
(530) 621-5520
(530) 626-4756 FAX
eldcag@edcgov.us

Greg Boeger, Chair – Agricultural Processing Industry
Lloyd Walker, Vice -Chair – Other Agricultural Interest
Chuck Bacchi – Livestock Industry
Bill Draper – Forestry Related Industries
Ron Mansfield – Fruit and Nut Farming Industry
Tim Nielsen – Livestock Industry
John Smith – Fruit and Nut Farming Industry

July 19, 2011

Governor Jerry Brown
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown,

We are writing in support of the efforts of the California Department of Food and Agriculture (CDFA) to develop an environmental impact report (EIR) for its statewide pest prevention and management program. This is a good example of a government agency acting in a proactive way that serves not only to fulfill their mission but also use good fiscal management in the pursuit of that mission. The proposed EIR will help make the pest prevention and management program not only more effective and efficient, but also more transparent. The program EIR is scheduled for completion in early 2013.

The proposed EIR will be comprehensive and employ integrated pest management (IPM) principles for management of invasive pests. Because it is comprehensive, it uses the agency funding in a more responsible way than developing an EIR for each pest prevention or management program as it comes along. Because it employs IPM principles, it is also an example of government environmental responsibility.

The proposed EIR will be written in such a way, using a decision-tree, that it will not only be easy to use, it will also make the decision-making process more transparent and easier for the public to understand. This EIR will provide the scientific and technical foundation for the agency's decision making within the program; including choice of management tools, mitigation measures and alternatives.

CDFA is using extraordinary measures to ensure input from the public, stakeholders, and other government partners with multiple public scoping meetings and a website with a listserv to help keep interested parties informed. The completed EIR will be an environmental document that CDFA can use in the future to make informed decisions that the public can easily understand. We feel that this is a benefit to California agriculture, the taxpayer, and the public in general.

Sincerely,

A handwritten signature in cursive script, reading "Juli D. Jensen".

Juli D. Jensen, Agricultural Commissioner
On behalf of El Dorado County Agricultural Commission

Cc: Karen Ross, Secretary of Agriculture



RECEIVED

July 15, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

JUL 22 2011

**OFFICE OF THE
CHIEF COUNSEL**

RE: Programmatic EIR for Plant Pest Prevention and Management

Dear Governor Brown:

I am writing on behalf of 1800 vineyard owners in Sonoma and Marin counties who have faced a series of invasive pests that are impacting profitable grape production in Sonoma County. Secretary Ross has proposed developing a programmatic Environmental Impact Report (EIR) for a Statewide Plant Pest Prevention and Management Program. We support this proposal because it will allow the state to have a more timely response to new invasive pest introductions. Time is of the essence in dealing with a new pest, and initiating an EIR after an invasion occurred is not working for our growers or California agriculture.

A comprehensive program based upon Integrated Pest Management principles will provide a science-based response to eradicate or manage the new pest while minimizing environmental impacts from the control program. I believe the program development and implementation can be transparent, effective and more efficient than the current process.

We ask that you will support CDFA in pursuing a programmatic EIR for plant pest introductions that threaten California agriculture.

Sincerely,

A handwritten signature in black ink that reads "Nick Frey". The signature is written in a cursive, slightly slanted style.

Nick Frey
President

✓Cc Karen Ross

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: Scoping Comment
Date: Friday, July 15, 2011 6:12:03 PM

From: Javandel, Farid [<mailto:FJavandel@ci.berkeley.ca.us>]
Sent: Friday, July 15, 2011 4:38 PM
To: Javandel, Farid; Carol Tate; Sandra Schubert
Cc: California Environmental Health Initiative; Debbie Friedman
Subject: RE: AGENDA & **NEW CALL NUMBER** -- CDFA Pest Management Programs Meeting/Call with Secretary Ross

The specific comments that I was hoping to make relative to this and any subsequent EIR's are:

- 1) The threshold of significance for evaluation of potential health impacts should not be to "minimize" health impacts as stated on the call, but to "completely avoid" or "not have" health impacts.
- 2) In assessment of potential health impacts of any chemical measures it is not sufficient to assume lack of health impacts if there have been no studies. This applies to both active and inert ingredients. For example "inert" particulate matter in the pesticide proposed for the LBAM program had the potential for significant health impacts when inhaled by humans or animals, but this was not addressed. There are air quality standards for particulate emissions from transportation and other activities, which should be applied here.
- 3) If a potentially significant health impact can't be mitigated it would be unacceptable to pursue statements of overriding consideration. Given a choice between public health and economic impacts to agricultural interests, public health must be held paramount!

Please treat these as formal comments on the scope of the EIR.

Farid Javandel
Mayor
City of Albany



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

801 K STREET, MS 19-01, SACRAMENTO, CALIFORNIA 95814 • (916) 322-4027 • WWW.CALRECYCLE.CA.GOV

July 18, 2011

Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Written Comments Concerning the California Department of Food and Agriculture's Program Environmental Impact Report for the Proposed Statewide Plant Pest Prevention and Management Program

Dear Ms. Dias:

Thank you for allowing the California Department of Resources Recycling and Recovery (CalRecycle) the opportunity to participate and comment on the California Department of Food and Agriculture's (CDFA) program environmental impact report (PEIR) for the proposed statewide plant pest prevention and management program (Statewide Program). We agree with CDFA that programs and activities need to be enacted to protect our state's plants and green material from harmful pests, while keeping the environmental impacts of these programs and activities in mind.

CalRecycle's mandate is to promote diversion of organic materials from being landfilled and the recycling or reuse of the diverted material to the highest end use, which includes compost. As part of this, CalRecycle is lead agency in the state that ensures compost products meet regulatory quality assurance and proper control standards for pathogen reduction and effective performance. Given this role, CalRecycle recommends that the Statewide Program emphasize an integrated pest management program that includes compost for healthy soils, as a proactive measure that minimizes the need for pesticides.

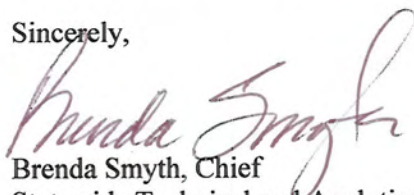
CalRecycle is a Responsible Agency as part of the Technical Advisory Committee and would like to submit the following perspectives:

- We request the Statewide Program consider compost use as a proactive measure to foster healthy soils and possibly reduce the need for pesticides;
- We are concerned with the use of persistent pesticides on plants and other compostable materials, specifically because these pesticides do not completely break down in the composting process and are returned back into the organic agriculture setting (e.g., bifenthrin, clopyralid, aminopyralid, etc.);
- We believe that composting green materials from quarantine zones (due to agriculture pests such as Asian Citrus Psyllid, Sudden Oak Death, Light Brown Apple Moth, European Grapevine Moth, etc.) could be used as a mitigation measure which may suppress the spread of pests; and
- There is also the potential for a significant increase in the amount of chipped green material directly applied to agricultural land due to the upcoming closure of the Puente Hills landfill in Los Angeles County. This material, currently being used for alternative daily cover (ADC), could be destined for land application in surrounding counties and, if not properly handled, may contribute to the spread of imported pests.



As mentioned, CalRecycle is a part of the Technical Advisory Committee and Pat Paswater is our peer review group member. Pat will provide further CalRecycle input to the development of the PEIR at upcoming Committee meetings. You may contact Pat at (916) 341-6870 or you can contact me directly using the information listed below.

Sincerely,



Brenda Smyth, Chief
Statewide Technical and Analytical Resources Branch
CalRecycle
(916) 341-6605

cc: Mark Leary, Acting Director, CalRecycle
Howard Levenson, Deputy Director, CalRecycle

DEPARTMENT OF TRANSPORTATION**DIVISION OF TRANSPORTATION PLANNING**

P.O. BOX 942874, MS-32

SACRAMENTO, CA 94274-0001

PHONE (916) 653-0808

FAX (916) 653-4570

TTY 711

www.dot.ca.gov/hq/tpp/

*Flex your power!
Be energy efficient!*

July 18, 2011

Michele Dias

Acting Chief Counsel

California Department of Food and Agriculture

1220 N Street, Suite 400

Sacramento, CA 95814

Statewide Plant Pest Prevention and Management Program (SCH No. 2011062057)

Dear Ms. Dias:

The California Department of Transportation (Department) appreciates the opportunity to comment on the Notice of Preparation for the Statewide Plant Pest Prevention and Management Program.

The California Department of Food and Agriculture (CDFA) proposes to develop a program Environmental Impact Report (EIR) for the proposed Statewide Plant Pest Prevention and Management Program. Because of California's rich and diverse natural and agricultural environment, many plant and animal communities are present, and the potential exists for a variety of pests to occur in a variety of areas. Plant pests may be found and prevention activities may occur in urban, rural, natural, and agricultural settings.

The Department's Local Development-Intergovernmental Review (LD-IGR) Program is your partner in stewardship of the public interest, our part of which are the present and future mobility needs of California. We offer the following comments at this time:

1. Costs of manual eradication and exposure to traffic by maintenance personnel increase the potential for accidents/fatalities to occur. The safety of Caltrans Maintenance workers is a top priority. Our equipment forces continue to be dwindled by decisions enacted by the Legislature to cut costs. Reduced timebase also lead to less time for equipment to be fully utilized which then compounds the reduction in equipment since it is not used as often.
2. It is possible that individual citizens or citizen groups could petition for not using pesticides in controlling noxious/invasive weeds along roadside corridors. CDFA should identify chemical compounds and their concentrations, and show these against a scale indentifying toxic exposure thresholds. A benefit however of the use of pesticides is that it would reduce the amount of exposure that our maintenance personnel would be subject to along the roadside.

Michele Dias
California Department of Food and Agriculture
July, 18 2011
Page 2

3. Please examine the potential for freight movement and uncovered loads that contribute to the spread of invasive species. The greatest concern for control of noxious weeds is the spreading of seeds by hay transport along the highways.
4. In the analysis, please address how prevention and management techniques would be incorporated into or impact existing practices regarding both construction and maintenance of public transportation facilities.

Encroachment Permits

Roadsides have become more dangerous as the number of people using our highway system keep increasing. Costs of manual eradication and exposure to traffic by maintenance personnel increase the potential for accidents/fatalities to occur.

Please be advised that any work or traffic control that encroaches on State right-of-way (ROW) requires an encroachment permit issued by the Department. Further information is available on the following website: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the Encroachment Permits office in the appropriate Caltrans District to ascertain whether such a permit will be required. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process.

Enclosed for your reference is a map of the Caltrans Districts and Counties within California, providing contact information for each District's Encroachment Permits office.

Please let me know if I can be of any assistance. My telephone number is 916.653.0808, and I can be reached via e-mail at: josh.pulverman@dot.ca.gov.

Sincerely,



Joshua Pulverman
Statewide Local Development-Intergovernmental Review Coordinator
Office of Community Planning

- c: State Clearinghouse, Governor's Office of Planning and Research (OPR)
G. Rosander, LD-IGR Coordinator, District 9
J. Olejnik, Caltrans District 5
K. Murray, Senior Landscape Architect

Michele Dias
California Department of Food and Agriculture
July, 18 2011
Page 3

Enclosure



District Encroachment Permit Offices



* Eastern Kern County and Northern San Bernardino County fall under D09's jurisdiction. Please contact the office if you have any questions.

7/18/11
July 14, 2011

Dear Michele Dias,

My name is Celeste McLean-Reid, and I live in Berkeley, CA.

I am concerned about the Notice of Preparation and the scope of the proposed Statewide Plant Pest Prevention Programmatic Environmental Impact Report.

▲ It is my right to protect my health and the health of children; This effort of the CDFA does not place the health of the community and of the environment above all else.

▲ There is very sound science to support handling these problems regarding pest management in a way that is less harmful to the community.

▲ In 2007-2008 I realized that there was a monetary interest in the companies manufacturing these pesticides, to have their products used. Where is the consciousness of these companies? (Only profit?)

Sincerely,
Celeste McLean-Reid

7/18/11

COMMENTS FOR PIER SCOPING PROCESS

My name is William Reid and I live in Berkeley, CA.

It is not clear in your NOP how much warning you would give us if you decide to spray us again. It is absolutely imperative to me that I get a say in the matter if you intend to threaten me, my family and my neighbors with your toxic pesticides. There are alternatives to this "Spray Baby Spray" approach. If you look at the most up to date science regarding pest management you will find there are ways to manage pests that do not threaten the lives of the populace.

Last time you sprayed over Santa Cruz there was no system in place for evaluating the impacts of your actions on human health and the environment (one little boy nearly died and will likely have serious health problems for the rest of his life). If, God forbid, you do spray again, a post spray evaluation system is another very important component to be included in the NOP.

Please take these concerns seriously. As government servants you are supposed to be representing our best interests not threatening our lives and, even more importantly, the lives of our children. Do you think it might be time to consider another approach that actually works?

William M Reid



RECEIVED

JUL 19 2011

OFFICE OF THE
CHIEF COUNSEL

July 18, 2011

Governor Jerry Brown
State Capitol Building, Suite 1173
Sacramento, CA 95814

Re: Comments on CDFA Draft Programmatic Environmental Impact Report

Dear Governor Brown:

The California Avocado Commission (Commission) appreciates the invitation to comment on the California Department of Food and Agriculture's Programmatic Environmental Impact Report (PEIR) for the Statewide Plant Pest Prevention and Management Program. The Commission supports the goals of the PEIR to facilitate rapid and effective prevention, eradication, and control of pest infestations statewide. Historical incursions of invasive pests have had very significant impact on the California avocado industry, resulting in an unwanted increase in pesticide use on California avocados. The Commission views eradication of known and unknown invasive species to be of vital importance to maintain the profitability of the industry and the economic benefit of the California avocado industry to the State of California.

California avocado growers are environmentally responsible and prefer to grow avocados sustainably and, where possible, support the view that new invasive pests should be eradicated rather than just controlled. To this end the California Avocado Commission supports the principles of Integrated Pest Management when considering control or eradication options for the most effective treatment with the least impact on the environment. To avoid the need for control or eradication, stopping or intercepting invasive pests before they become established in California is viewed by the Commission as the most important activity in responding to invasive pests should border controls fail.

The Commission supports the broad consultation undertaken in the scoping of the PEIR. Having the environmental review conducted in advance of an invasive pest incursion allows more time for public and scientific input, and review of the management tactics for control. The Commission agrees with the process having robust public consultation. The most destructive invasive pests to California avocados in the past 30 years have been unknown to science and initial identifications could only be into broad categories. For this reason, we believe the principal of treatment based on pest type, rather than individual species, is sound.

While supporting the PEIR, in principle, the Commission does have certain concerns. In the documents provided there are no details for a review process for the PEIR. While implied, there appears to be no clear process for adding or removing a pest program and control



techniques. The Commission funds research on identifying new pests, their biology and natural controls and chemical treatments. What would be the process by which this new scientific information is to be considered in the PEIR?

There are additional questions on the system flexibility where the PEIR could change in response to new techniques for best prevention and eradication of invasive pest incursions. For example, once an invasive pest ceases to be unknown and is positively identified, could eradication or control using more targeted and less environmental impactful eradication options be used? The Commission urges that the methods of treatment must be effective and proven, as invasive species by their nature are hyper-virulent and cannot be effectively controlled without chemical treatments or other strong measures. Therefore, the PEIR must not be distracted by "weak" control measures claiming to be effective.

Thank you for your consideration of the Commission's comments on the proposed CDFA PEIR.

Sincerely,

Jonathan Dixon, PhD
Research Program Director

cc: California Secretary of Agriculture Karen Ross



AGRICULTURAL COMMISSION

311 Fair Lane
Placerville, CA 95667
(530) 621-5520
(530) 626-4756 FAX
eldcag@edcgov.us

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Tim Nielsen – Livestock Industry
John Smith – Fruit and Nut Farming Industry

July 19, 2011

Governor Jerry Brown
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814



Dear Governor Brown,

We are writing in support of the efforts of the California Department of Food and Agriculture (CDFA) to develop an environmental impact report (EIR) for its statewide pest prevention and management program. This is a good example of a government agency acting in a proactive way that serves not only to fulfill their mission but also use good fiscal management in the pursuit of that mission. The proposed EIR will help make the pest prevention and management program not only more effective and efficient, but also more transparent. The program EIR is scheduled for completion in early 2013.

The proposed EIR will be comprehensive and employ integrated pest management (IPM) principles for management of invasive pests. Because it is comprehensive, it uses the agency funding in a more responsible way than developing an EIR for each pest prevention or management program as it comes along. Because it employs IPM principles, it is also an example of government environmental responsibility.

The proposed EIR will be written in such a way, using a decision-tree, that it will not only be easy to use, it will also make the decision-making process more transparent and easier for the public to understand. This EIR will provide the scientific and technical foundation for the agency's decision making within the program; including choice of management tools, mitigation measures and alternatives.

CDFA is using extraordinary measures to ensure input from the public, stakeholders, and other government partners with multiple public scoping meetings and a website with a listserv to help keep interested parties informed. The completed EIR will be an environmental document that CDFA can use in the future to make informed decisions that the public can easily understand. We feel that this is a benefit to California agriculture, the taxpayer, and the public in general.

Sincerely,

A handwritten signature in blue ink that reads "Juli D. Jensen".

Juli D. Jensen, Agricultural Commissioner
On behalf of El Dorado County Agricultural Commission

Cc: Karen Ross, Secretary of Agriculture

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: PEIR Scoping Comment
Date: Wednesday, July 20, 2011 11:50:05 AM

From: Jennifer Jackson [\[mailto:jwiddy2@comcast.net\]](mailto:jwiddy2@comcast.net)
Sent: Tue 7/19/2011 6:14 PM
To: Pest PreventionEIR
Subject: NOP/EIR

To Whom it May Concern:

I would like to share the following questions and concerns regarding the Notice of Preparation and the scope of the proposed Statewide Plant Pest Prevention Programmatic Environmental Impact Report:

1) It is not clear in the Notice of Preparation what steps CDFA would take before carrying out, for example, wide-area pesticide spraying such as was done for the light brown apple moth in 2007.

When and how will I, and other members of the public, have a meaningful voice and ability to influence CDFA's future pest management activities, which could involve spraying my community or my food with pesticides?

It is not acceptable to propose a scope for this PEIR that would take away my right to stop or affect state actions that would have a direct impact on my health and the health of my family.

2) The NOP mentions human health only as one of several program objectives. The primary goal for this EIR should be to find alternative ways to manage pests so as to eliminate adverse human and environmental health impacts created by pest management activities.

3) The "Program Components" outlined in the NOP should describe CDFA's plans to develop a system for evaluating human and environmental health impacts from the treatments considered in the Statewide Program, and ways to minimize or eliminate those impacts. It is not enough to simply state in the NOP that a program objective is to minimize impacts to human health and the environment. The PEIR should include the specific plans for achieving that objective in the program.

4) The NOP relies on the same outdated assumptions and approach to pests that CDFA has been using for decades: quarantine, and eradication or containment. This approach does not work as we have seen with the repeated quarantine and eradication projects for the same pests year after year. The NOP makes inaccurate statements, such as that pests often spread rapidly and can be eradicated if rapid action is taken although we know based on prior experience that in general pests do not spread rapidly and that eradication has seldom if ever

succeeded.

Why does the PEIR rely on CDFA's past practices when new science from our own state universities is available to update the current approach so that it is more effective, less toxic and far less burdensome to our farmers? Where are the provisions in this PEIR for modernizing and updating the state's approach to pests, to take advantage of this new scientific research and technology and to eliminate the use of toxic chemicals and quarantines that can be devastating to farmers?

Thank you for your time.

Sincerely,
Jennifer Jackson
San Rafael, California



COUNTY OF KINGS BOARD OF SUPERVISORS

KINGS COUNTY GOVERNMENT CENTER
1400 W. LACEY BOULEVARD, HANFORD, CA 93230
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RICHARD FAGUNDES - DISTRICT 5
HANFORD & HOME GARDEN



July 19, 2011

Governor Jerry Brown
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814

Re: CDFA's Statewide Program Environmental Impact Report [PEIR]
Kings County Board of Supervisors' SUPPORT

Dear Governor Brown:

From time-to-time invasive pests are introduced into the environment of California and when this happens the California Department of Food and Agriculture (CDFA) is called upon to protect this state's environment and food producing resources. It is imperative to initiate a quick response in order to effectively contain, reduce, and eventually remove the threat to our food producing resources and potential damage to the environment. CDFA is currently developing an Environmental Impact Report (EIR) for its statewide pest prevention and management program [Program]. We are told the Program EIR will be comprehensive and employ Integrated Pest Management (IPM) principles and provide a scientific and technical foundation for the Program's decision making for the management of invasive pests.

We believe a statewide PEIR will provide for more timely response to mitigate the impacts to our environment and our food producing resources when the introduction/detection of invasive pests are discovered in the future. We therefore respectfully request your support, along with ours, in the completion of this vital statewide Program Environmental Impact Report.

Thank you for this important consideration.

Respectfully,

Tony Barba, Board Chairman
Kings County Board of Supervisors

Cc: Karen Ross, Secretary of Food and Agriculture
Michele Dias, Acting Chief Counsel, CDFA
Tim Niswander, Agricultural Commissioner-Sealer, Kings County



Kings County Farm Bureau

870 Greenfield Avenue ♦ Hanford, California 93230
Telephone (559) 584-3557 ♦ FAX (559) 584-1614 ♦ www.kcfb.org



July 19, 2011

Governor Jerry Brown
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814

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Bob Wilson

Frank Zonneveld

Re: Support CDFA's Statewide Program Environmental Impact Report [PEIR]

Dear Governor Brown:

From time-to-time invasive pests are introduced into the environment of California. When this happens, the California Department of Food and Agriculture (CDFA) is called upon to protect this state's environment and food producing resources. It is imperative to initiate a quick response in order to effectively contain, reduce, and eventually remove the threat to our food producing resources and potential damage to the environment. CDFA is currently developing an Environmental Impact Report (EIR) for its statewide pest prevention and management program [Program]. We are told the Program EIR will be comprehensive and employ Integrated Pest Management (IPM) principles and provide a scientific and technical foundation for the Program's decision making for the management of invasive pests.

We believe a statewide PEIR will provide for more timely response to mitigate the impacts to our environment and our food producing resources when the introduction/detection of invasive pests are discovered in the future. We therefore respectfully request your support, along with ours, in the completion of this vital statewide Program Environmental Impact Report.

Thank you for this important consideration.

Respectfully,

Jim Crisp, President
Kings County Farm Bureau Board

Cc: Karen Ross, Secretary of Food and Agriculture
Michele Dias, Acting Chief Counsel, CDFA
Tim Niswander, Agricultural Commissioner-Sealer, Kings County

Dennis Knepp

From: Dennis Knepp <dennis.knepp@corvidhut.com>
Sent: Tuesday, July 19, 2011 9:27 AM
To: 'PEIR.info@cdfa.gov'
Subject: Comments to PEIR

RECEIVED

JUL 26 2011

OFFICE OF THE
CHIEF COUNSEL

I would like to share the following questions and concerns regarding the Notice of Preparation and the scope of the proposed Statewide Plant Pest Prevention Programmatic Environmental Impact Report:

1) It is not clear in the Notice of Preparation what steps CDFA would take before carrying out, for example, wide-area pesticide spraying such as was done for the light brown apple moth in 2007.

When and how will I, and other members of the public, have a meaningful voice and ability to influence CDFA's future pest management activities, which could involve spraying my community or my food with pesticides?

It is not acceptable to propose a scope for this PEIR that would take away my right to stop or affect state actions that would have a direct impact on my health and the health of my family.

2) The NOP mentions human health only as one of several program objectives. The primary goal for this EIR should be to find alternative ways to manage pests so as to eliminate adverse human and environmental health impacts created by pest management activities.

3) The "Program Components" outlined in the NOP should describe CDFA's plans to develop a system for evaluating human and environmental health impacts from the treatments considered in the Statewide Program, and ways to minimize or eliminate those impacts. It is not enough to simply state in the NOP that a program objective is to minimize impacts to human health and the environment. The PEIR should include the specific plans for achieving that objective in the program.

4) The NOP relies on the same outdated assumptions and approach to pests that CDFA has been using for decades: quarantine, and eradication or containment. This approach does not work as we have seen with the repeated quarantine and eradication projects for the same pests year after year. The NOP makes inaccurate statements, such as that pests often spread rapidly and can be eradicated if rapid action is taken although we know based on prior experience that in general pests do not spread rapidly and that eradication has seldom if ever succeeded.

Why does the PEIR rely on CDFA's past practices when new science from our own state universities is available to update the current approach so that it is more effective, less toxic and far less burdensome to our farmers? Where are the provisions in this PEIR for modernizing and updating the state's approach to pests, to take advantage of this new scientific research and technology and to eliminate the use of toxic chemicals and quarantines that can be devastating to farmers?

6) On the face of it, the PEIR ignores new information, new science and old results (namely the utter failure of the CDFA LBAM extermination). The CDFA is still breeding wasps (going on 4 years now), sterile LBAM (I think that has stopped, it does not work), and still exterminating outlier LBAM populations. Bazillions of the LBAM are in Golden Gate Park eating everything (according to the CDFA), and yet there is no extermination effort there. Of course, these LBAM stay there and never move, San Francisco is so welcoming. How can anyone think that the LBAM is or ever was a serious program? And how do you think that this statewide attempt to justify any future action by the CDFA possibly makes any sense?

Dennis Knepp
2 White Tail Lane
Monterey, CA 93940

Dennis T. Knepp

Not is there any damage!

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: Scoping Comment: Opposition to PEIR plan
Date: Tuesday, July 19, 2011 10:03:12 AM

From: Bill Rothman [<mailto:iboard@well.com>]
Sent: Tue 7/19/2011 9:58 AM
To: Pest PreventionEIR
Subject: Opposition to PEIR plan

From William Rothman, MD

I am writing to oppose the current PEIR proposal, because of its preclusion of public input when the use of a particular pesticide is contemplated.

I wish to point out that it was only after such input that plans for aerial spraying for the Light Brown Apple Moth were stopped.

Almost every week we learn about more and more problems with more and more pesticides. For that reason, it is only public testimony at the time when the use of a particular agent is being contemplated that can guarantee appropriate consideration of toxicities, etc.

A copy of this email is being sent to the Governor.

Sincerely,
William Rothman, MD

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR Scoping Comment
Date: Wednesday, July 20, 2011 12:12:49 PM

From: robertaanthes@aol.com [<mailto:robertaanthes@aol.com>]
Sent: Wed 7/20/2011 12:05 PM
To: Pest PreventionEIR
Subject: Notice of Preparation

Dear Michele Dias,

I appreciate the opportunity to respond to the recent Notice of Preparation posted by the CDFA.

I strongly object to the clause which states that "this EIR is not intended to address emergency projects." In an emergency, the CDFA can authorize a project which is exempt from CEQA review.

This offers the CDFA far too much latitude in defining and acting on "emergencies" before CEQA can review the projects, or the public can react to them.

The LBAM situation was a case in point, severely compromising the credibility of the CDFA. The CDFA defined the limited presence of LBAMs an "emergency" and proceeded to use a poorly-studied aerial spray over residential neighborhoods in Santa Cruz and Monterey. Over 642 illnesses were reported as a result.

Despite public outcry and lack of evidence for its claims, the CDFA then declared an "emergency" in Marin County as well. The aerial spray was halted. No "emergency" ever occurred - because there never was an emergency. Not in Marin, and not in Santa Cruz or Monterey. Unless you count the many millions lost by the Resnicks.

There is no possible circumstance under which we can trust the CDFA to declare an emergency without CEQA and public oversight.

Change this emergency provision and regain public trust.

Sincerely,
Roberta J. Anthes, Ph.D.

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR Scoping comment
Date: Wednesday, July 20, 2011 2:03:10 PM

From: Diane Hoffman [\[mailto:hoffman_diane@yahoo.com\]](mailto:hoffman_diane@yahoo.com)
Sent: Wed 7/20/2011 1:30 PM
To: Pest PreventionEIR
Subject: Notice of Preparation: URGENT!!

Dear Michele Dias,

Thanks for the chance to respond to the recent Notice of Preparation posted by the CDFA.

I do not agree with the clause which states that "this EIR is not intended to address emergency projects." In an emergency, the CDFA can authorize a project which is exempt from CEQA review because

this offers the CDFA far too much latitude in defining and acting on "emergencies" before CEQA can review the projects, or the public can react to them.

The LBAM situation severely compromised the credibility of the CDFA. The CDFA defined the limited presence of LBAMs an "emergency" and proceeded to use a poorly-studied aerial spray over residential neighborhoods in Santa Cruz and Monterey. Over 642 illnesses were reported as a result.

Despite public outcry and lack of evidence for its claims, the CDFA then declared an "emergency" in Marin County as well. The aerial spray was halted. No "emergency" ever occurred - because there never was an emergency. Not in Marin, Santa Cruz or Monterey.

There is no possible circumstance under which we can trust the CDFA to declare an emergency without CEQA and public oversight.

Change this emergency provision and regain public trust and regain good standing with the public.

Sincerely,
Diane Hoffman

Diane Hoffman
REAL ESTATE, WITH INTEGRITY
AND ATTENTION TO DETAIL
Bradley Real Estate
44 Bolinas Road
Fairfax, CA 94930
Bus: 415-482-3139
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www.MarinHomeReview.com



CALIFORNIA DRIED PLUM BOARD

3840 Rosin Court
Suite 170
Sacramento, CA 95834

Phone (916) 565-6232
Fax (916) 565-6237
www.CaliforniaDriedPlums.org



July 21, 2011

Michelle

The Honorable Jerry Brown
Governor, State of California
State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown:

On behalf of the California Dried Plum Board and its 920 growers and processors, I am writing in support of the California Department of Food and Agriculture's (CDFA) preparation of a Program Environmental Impact Report (PEIR) for a Statewide Plant Pest Prevention and Management Program.

California's agricultural and natural resource assets are a vital component of our economic, environmental and cultural composition. The California dried plum industry proudly represents a part of the multi-billion dollar bounty of specialty crops that make California one of the world's most important providers of safe and nourishing food, producing 99% of the domestic supply and 48% of the international supply of prunes with a farm gate value of \$154 million (2010). It is critical that we protect this food supply from the increasing threat of destructive pests and plant diseases.

Unfortunately, as the challenge of managing these risks becomes more complicated, the time and cost investment to prepare environmental documentation becomes greater, even when decisive action is necessary to avoid an uncontrolled outbreak. As each new pest or disease is discovered, a regulatory process of planning, analysis, public input and review must begin again, exposing California agriculture to unnecessary environmental and financial risk. Ironically, the only solution to controlling the outbreak when delays exacerbate the problem is often more intensive use of chemicals and other measures that might have been avoided through a timely response.

As the responsible state agency for management and control of pest infestations and plant diseases, CDFA is creating this PEIR as a vehicle to provide a transparent, time-sensitive and efficient framework for evaluating potential environmental impacts of the various integrated pest management activities implemented by the agency and its partners. The PEIR will provide a comprehensive human health and ecological risk assessment, ultimately providing California Environmental Quality Act compliance for all CDFA pest prevention and management programs. The PEIR will employ the best scientific and technical information for decision making and seek expanded public participation with additional environmental analysis and comment. Ultimately, the

PEIR will enable responsible agencies and agricultural interests to deal most efficiently and cost-effectively with these increasing threats in a time of decreasing budgets and staff.

A vibrant California agricultural economy is too vital to leave to chance each time a potentially devastating pest or plant disease outbreak occurs. I urge you to support the Program Environmental Impact Report for Statewide Plant Pest Prevention and Management being prepared by the California Department of Food and Agriculture.

Sincerely,



Donn Zea
Executive Director
California Dried Plum Board

cc: Secretary Karen Ross ✓
CDPB Executive Committee
CDPB Production Research Subcommittee

From: Edward Mainland <emainland@comcast.net>
Subject: **PEIR Scoping Comments**
Date: July 21, 2011 7:32:36 PM PDT
To: PEIR.info@cdfa.gov

RECEIVED

JUL 26 2011



I am Edward A. Mainland. I reside in Novato (Marin County), California.

**OFFICE OF THE
CHIEF COUNSEL**

I'm very concerned about shortcomings in the Notice of Preparation and scope of the proposed statewide Plant Pest Prevention Programmatic Environmental Impact Report (PEIR). Judging from scoping, it would appear to give too much unchecked power to state agencies and rely on outdated science and misconceptions that are long overdue for reform, replacement and retirement.

PEIR doesn't make clear how residents could have any effective means of influencing CDFA's future pest management activities. If the latter mean continued indiscriminate broad-scale pesticide spraying, count me out. The Light Brown Apple Moth fiasco was evidence enough that CDFA cannot be so easily trusted to uphold the public interest, given pressures to spray. PEIR would apparently erase any means for citizens to affect such decisions. This is a major step backward.

PEIR's primary goal is multiple and confused. Please make the clear, primary EIR goal finding alternative ways to manage pests in order to avoid adversely affecting human and environmental health through pest management. Fortunately, modern research is telling us the way to how this can be done if only CDFA can be induced to listen.

PEIR should include specific plans for achieving the objective in the program of protecting human health and the environment..

NOP unfortunately falls back on the old, out-of-date presumptions and approaches for dealing with pests that CDFA has so unsatisfactorily locked itself into for many decades. Quarantine, eradication, containment -- year after year -- they don't work on any consistent basis and they just can't be depended upon to operate safely and without significant harm. Further, we hear again in the NOP the same old malarkey that pests often spread rapidly and can be eradicated if rapid action is taken although scientists tell us, based on past experience, that generally speaking pests do not spread rapidly and that eradication has seldom if ever succeeded.

There is absolutely no reason why PEIR sticks with CDFA's discredited past practices when new science from our own California colleges and universities has emerged to update the current approach and make managing so-called pests more effective, less toxic and far less burdensome to farmers.

Perhaps the chief lack in PEIR, the main failing, is the absence of any attention to reforming state's approach to pests, taking advantage of new scientific research and technology. and phasing out the use of toxic chemicals and quarantines that have proven to be so injurious to both farmers and the wider public.

Can't we try to farm without poisoning ourselves and our surroundings?.

A handwritten signature in blue ink, appearing to be 'E. Mainland'.

Via U.S. mail and e-mail (PEIR.info@cdfa.ca.gov)

Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

July 21, 2011

RE: Statewide Plant Pest Prevention and Management Program – Scoping Comments

Dear Ms. Dias:

The following agricultural associations appreciate the opportunity to express our support for the Statewide Plant Pest Prevention and Management Program (“Pest Program”), and to submit the following scoping comments in relation to the program Environmental Impact Report (“program EIR”) being prepared by the California Department of Food and Agriculture (“CDFA”) in compliance with the California Environmental Quality Act (“CEQA”).

AB 2763 (Laird) requires CDFA to develop a plan for the detection, exclusion, eradication, control or management of invasive pests within the State of California. We understand the Pest Program to comply with this legislative mandate, setting forth a range of current and potential future pest prevention and control activities throughout California which may be implemented by CDFA and other agencies. The program EIR will provide a program-level framework that may be used for subsequent CEQA analysis including, where necessary, tiering of subsequent project-level CEQA documentation. Together, the Pest Program document and the program EIR will enable a timely and efficient response by CDFA to plant pest threats, allowing for the streamlining of project-level implementation activities.

In compliance with CEQA, we support a full and comprehensive environmental analysis of direct and reasonably foreseeable indirect environmental impacts that may occur as a result of the Pest Program, to be set forth in the program EIR. A robust program EIR will minimize the need for follow-on analysis as to individual implementation activities, and will foreclose the need to revisit policy objectives through CEQA litigation. Both results will facilitate CDFA’s future rapid and effective response to emerging plant pest exigencies that threaten California’s vibrant and diverse agricultural economy.

We look forward to working with CDFA on both the Pest Program specifically, and on the many pressing issues that face California agriculture generally.

Agricultural Council of California
California Apple Commission
California Association of Pest Control Advisers
California Association of Wheat Growers
California Bean Shippers Association
California Blueberry Commission
California Cut Flower Commission
California Date Commission
California Farm Bureau Federation
California Grape and Tree Fruit League
California Nurseries and Garden Centers
California Pear Growers Association
California Seed Association
California State Floral Association
California Strawberry Commission
California Tomato Growers Association
California Warehouse Association
Nisei Farmers League
Western Growers
Western Pistachio Association
Wine Institute

cc: Karen Ross, Secretary, California Department of Food and Agriculture

BERG HOLDINGS

A CALIFORNIA CORPORATION

July 22, 2011

ATTN: Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814
PEIR.info@cdfa.ca.gov

RE: CDFA's June 23, 2011 Notice of Preparation of a Draft Programmatic Environmental Impact Report for the Statewide Plant Pest Prevention and Management Program

Dear Ms. Dias,

Thank you for the opportunity to comment on the California Department of Food and Agriculture's Draft Programmatic Environmental Impact Report (PEIR) for the Statewide Plant Pest Prevention and Management Program.

Over the past few years, the Department's handling of the light brown apple moth control program has raised serious concerns about agency's ability to accurately and credibly handle non-native pest control in the state. With increased global warming and global trade, pest problems will only grow in the state. It's with these concerns in mind, that I urge you to consider the following:

It is unacceptable for the PEIR to limit public participation in future pest management activities. As was the case with the apple moth, unnecessary aerial pesticide spraying was opposed by the full majority of the public. Stripping the ability of the public to voice concern is not only undemocratic but also unresponsive to community concerns. I urge you to consider additional steps to those outlined in the Notice of Preparation (NOP) to increase public participation as part of any future pest management activities.

Human health should be the primary goal. While the Notice of Preparation mentions human health as one objective, the primary goal for this EIR should be to find alternative ways to manage pests so as to eliminate adverse human and environmental health impacts created by pest management activities.

Adopt modern approaches to pest control. The NOP relies on the same outdated assumptions and approach to pests that CDFA has been using for decades: quarantine, and eradication or containment. This approach does not work as we have seen with the repeated quarantine and eradication projects for the same pests year after year.

The PEIR should include provisions to adapt to emerging science from state universities advance solutions that are more effective, less toxic and far less burdensome to our farmers. Research increasingly from researchers at the University of California is advancing greener, more health-protective solutions to the state's pest problems.

Thank you for the opportunity to comment on the PEIR. Please contact me at skipb@bergholdings.com or 415-289-4920 if you have any questions.

Sincerely,



Skip Berg

cc: Assemblymember Jared Huffman, Assemblymember.Huffman@outreach.assembly.ca.gov

2330 Marinship Way, Suite 301
Sausalito, California 94965
415.289.4920



Cal-IPC

California Invasive Plant Council

1442-A Walnut St., #462
Berkeley, CA 94709
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www.cal-ipc.org

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San Elijo Lagoon Conservancy

Julie Horenstein, Secretary
Cal. Dept. of Fish & Game

Edith Allen
UC Riverside

Peter Beesley
Pacific Gas & Electric, Co.

Jason Casanova
*Los Angeles / San Gabriel Rivers
Watershed Council*

Edmund Duarte
Alameda County Dept. of Agriculture

Valerie Eviner
UC Davis

Kim Hayes
Elkhorn Slough Foundation

Sue Hubbard
Natural Resource Manager, Salinas

Brent Johnson
Natural Resource Manager, Paicines

Shawn Kelly
So. Cal. Wetlands Recovery Project

Shea O'Keefe
*USDA-Natural Resources Conservation
Service*

Peter Schuyler
Santa Barbara

Andrea Williams
Marin Municipal Water District

Student Liaisons

Chelsea Carey, *UC Merced*

Kai Palenscar, *UC Riverside*

[Affiliations for identification only]

July 22, 2011

Michele Dias
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Dear Ms. Dias:

The California Invasive Plant Council is a nonprofit conservation organization serving the state's natural resource managers and researchers. We are writing to submit comment on CDFA's Notification of Preparation (NOP) for a Program Environmental Impact Review (PEIR) of its pest management programs.

Cal-IPC works strictly on invasive plants, so our comments pertain only to the "Noxious Weed Control Program". We cannot comment on the other three programs listed in the NOP which address other types of pests. Our comments are as follows:

1. Include invasive plant species not currently listed as noxious weeds.

The noxious weed list does not currently include many plant species listed as invasive by the Cal-IPC Inventory. Natural resource managers throughout the state work to manage these invasive plants on the ground, even though the species are not formally listed as noxious. The Weed Management Area program run through CDFA has funded work on such species.

The Cal-IPC Inventory lists some 200 plant species as invasive in California, using a criteria system developed with partners in Arizona and since adopted in several other states. The Cal-IPC Inventory is widely recognized as the definitive list of plants of ecological concern in California. It is cited in the state's model water conservation ordinance, and nursery industry representatives working on the Plantright Partnership have adopted it as their reference source for determining which species are invasive.

The PEIR should address management efforts of species listed in the Cal-IPC Inventory. In addition, the PEIR should address management of other non-native species found in wildlands that are considered a potential threat by early detection efforts like the Bay Area Early Detection Network. (Such species are listed by Cal-IPC on our watch list, but are not included in the Cal-IPC Inventory until impacts are documented.)

2. Assess impacts of all control methods.

All control methods have potential non-target impacts, and these should be identified and assessed in the PEIR. This information helps inform decisions made through an Integrated Pest Management approach.

3. For herbicides, assess all common formulations and adjuvants used.

Natural resource managers using an herbicide may employ a range of formulations or may prepare their own mix (for instance, when wanting to select a particular surfactant). The PEIR should find a way to include all relevant products, including aquatic formulations and surfactants.

4. Involve stakeholders in developing the PEIR, especially potential critics.

Though we believe the PEIR can be an efficient way to provide substantial public review of common practices in an efficient, coordinated way, the PEIR will have to address public concern that “streamlining regulation” potentially avoids full environmental review. Getting critics involved in the development of the PEIR may help address concerns up front and build more support for the eventual product.

Thank you for the opportunity to comment. We stand ready to work with CDFA and other stakeholders to strengthen prevention and response programs for invasive species. Please contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Giessow", with a stylized flourish at the end.

Jason Giessow, President
Board of Directors



CALIFORNIA
GRAPE & TREE FRUIT
LEAGUE

TELEPHONE 559.226.6330

FAX 559.222.8326

EMAIL cgtfli@cgtfli.com

978 W. Alluvial, Suite 107
Fresno, California 93711-5700

July 22, 2011

Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 North N Street, Suite 400
Sacramento, CA 95814

Re: Notice of Preparation of Draft Environmental Impact Report (PIER)

Dear Ms. Dias:

The California Grape and Tree Fruit League (League) is a public policy agricultural industry association with origins dating back to 1921. The League represents California's table grape and deciduous tree fruit growers, packers and shippers; our members produce fresh fruit throughout the state and include: Coachella Valley (table grapes), San Joaquin Valley (all commodities), Santa Clara County (cherries), Lake County (pears), as well as Mendocino, Yuba, Stanislaus, San Joaquin and Sacramento Counties (pears, plums, cherries, kiwi and apricots).

We appreciate the opportunity to provide comments to the notice of preparation of the draft PIER, and also communicate that the League is in support of the program's efforts aimed at strengthening pest detection, treatment and eradication capabilities through a transparent stakeholder process. It remains our belief that this process will provide the public with the educational opportunity to learn about the origination of invasive plant pest or disease introduction into the State of California and the importance of effective treatment and response protocols.

Our industry and the members we represent concur that it is important for California to have in place a Statewide program, as it is critical not just to agriculture, but to native plants, forest species, ornamental plants and animal species that are dependent upon them as a food source. To accomplish these goals the State must possess the ability to facilitate rapid and effective prevention, eradication and controls for new or expanding invasive plant pests or disease.

We are encouraged by the initiation of a statewide environmental assessment, especially one that allows the flexibility for project specific mitigations, is able to determine which successful control technique should be applicable to the specific situation or environment and reaches a level of preparedness for the collective goal of eliminating or eradicating the threat to the environment.

The California Grape & Tree Fruit League would like to thank you for consideration of our comments. Please do not hesitate to contact us if we can provide any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Bedwell".

Barry Bedwell
President

cc: Karen Ross, Secretary of Food and Agriculture

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: Comment: NOP of Draft EIR for Statewide Pest Prevention & Management Program
Date: Friday, July 22, 2011 9:28:25 AM

From: Frederick W. Klose [<mailto:fklose@cawildrice.com>]
Sent: Fri 7/22/2011 9:15 AM
To: Pest PreventionEIR
Subject: NOP of Draft EIR for Statewide Pest Prevention & Management Program

To Whom It May Concern:

The California Wild Rice Advisory Board represents all wild rice growers in the State – who farm up to 24,000 acres in the Sacramento Valley and in Northeastern California. On behalf of the Board, I wish to register the Board's support of CDFA's proposal to conduct a "systemwide" Environmental Impact Report for Pest Prevention and Management. I believe that such an approach will greatly reduce the timeframe required to meet the challenges of pest findings that could have a drastic negative impact on agricultural production and farmer's livelihoods.

While we realize the importance of ensuring that any pest management / eradication program not be detrimental to California's environment overall, we also understand the need for "quick action" in addressing pest threats before they become even greater. This proposal by CDFA will accomplish both of these important goals, while also incorporating contingencies for future unknown treatment methods. We congratulate CDFA for taking this pro-active step to see the "big picture", rather than following a "piecemeal" approach to the problem.

I look forward to following this process, and having an opportunity to contribute in whatever way possible to the successful conclusion of this important step in protecting California agriculture for the future.

Best Regards,

Frederick W. Klose
Manager
California Wild Rice Advisory Board
Buffum Building
4125 Temescal St.
Fair Oaks, CA 95628

Tel: 916-863-0312
Fax: 916-863-0304

JUL 22 2011

OFFICE OF THE
County of Fresno

DEPARTMENT OF AGRICULTURE

CAROL N. HAFNER

AGRICULTURAL COMMISSIONER/
SEALER OF WEIGHTS & MEASURES

July 14, 2011

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

RE: Department of Food & Agriculture's Notice of Preparation for a Statewide Plant Pest Prevention and Management Program Environmental Impact Report (PEIR)

Dear Governor Brown:

The need for a comprehensive, scientifically based, statewide pest prevention program continues as pest pressures from outside of the state's boundaries continue to bombard and threaten our economy and environment. Hand in hand with this need is the necessity for addressing California Environmental Quality Act (CEQA) requirements. The Notice of Preparation for the PEIR is the first critical step towards addressing a systematic approach to plant pest infestations.

The initial development of the PEIR will encompass the full breadth of pest management strategies and scientific tools currently available to address plant pest infestations beyond just chemical control. As I have witnessed in the recent European grapevine moth infestation in Fresno County, integrated pest management approaches including the physical removal of host material is proving to be another key element to the eradication of this pest.

As the future brings new techniques and management tools to the forefront, the PEIR would allow the addition of new strategies which would be open to review and comment by all interested parties which provides transparency and encourages feedback from stakeholders; it is designed to be a living document.

The development and implementation of the Statewide Plant Pest Prevention and Management Program Environmental Impact Report as a tool is long overdue. I strongly support the development of this report and look forward to its full implementation in the future.

Sincerely,

Carol N. Hafner

Agricultural Commissioner/Sealer of Weights and Measures

cc: Karen Ross, Secretary of Agriculture

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: Scoping Comment, I think
Date: Friday, July 22, 2011 3:38:32 PM

From: valeri hood [\[mailto:bertmbartsch@yahoo.com\]](mailto:bertmbartsch@yahoo.com)
Sent: Fri 7/22/2011 3:06 PM
To: Pest PreventionEIR; Assemblymember.Huffman@outreach.assembly.ca.gov;
Frances D. Hinckley
Subject: LBAM spray- again

Yesterday was the 5th anniversary of that most famous little LBAM losing its way into Professor Powell's trap in Berkeley.
And still no damage-- there is no emergency- no justification for a PEIR. Let's stick to the process, however flawed that we now have in place!
Some informed locals and a very few officials have worked tirelessly to educate the population about the environmental damage of such toxic programs as the proposed government LBAM intoxication of the populace with pesticides, plus harmful so-called inert chemicals. I am concerned that the same actors involved in the push towards the use of these toxics- even without the interference of the pro-pesticide Schwarzenegger group, are still involved in this- such as Stuart Resnick. Let's be proactive and protective of our increasingly vulnerable people instead!

Valeri Hood
79 Dominga Ave. Farifax, Ca 94930



LISA M. LEONDIS
AGRICULTURAL COMMISSIONER/
SEALER OF WEIGHTS & MEASURES

County of San Diego

DEPARTMENT OF AGRICULTURE, WEIGHTS AND MEASURES

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FAX (760) 752-4703

July 22, 2011

California Department of Food and Agriculture
Attn: Michele Diaz, Acting Chief Counsel
1220 N Street, Suite 400
Sacramento, CA 95814

NEED FOR STATEWIDE PEST PREVENTION AND MANAGEMENT PROGRAM EIR

Dear Ms. Diaz:

I am writing on behalf of San Diego County to express support for the California Department of Food and Agriculture's (CDFA) efforts to develop a Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR) including support for the scope of the EIR contained in the Notice of Preparation.

Invasive pests, including fruit flies, beetles, moths, weeds, and plant diseases are a huge threat to San Diego County, as well as California. A comprehensive and scientific EIR based on Integrated Pest Management principles is critical to provide the necessary tools to prevent pest introduction and establishment and manage pests we cannot prevent. Public participation, which will strengthen the final document, is equally critical to the success of this effort. We applaud CDFA's commitment to holding five public scoping sessions and a web-based meeting to facilitate involvement.

San Diego County experiences a continual onslaught of pest introductions due to many risk factors including: a mobile urban population; numerous international ports of entry for passengers and cargo via airplanes, trucks, and ships; and miles of border. Over the last few years, San Diego County has experienced quarantines and eradication projects for pests such as Mediterranean fruit flies, Asian citrus psyllid, Japanese beetle, Light brown apple moth, Oriental fruit flies, Diaprepes root weevil, Mexican fruit flies, Red imported fire ants, Yellow star thistle, Spotted knapweed, and Perennial peppergrass.

County Agricultural Commissioners value our partnership with CDFA to protect California's food system, environment and agricultural economy. The Statewide Plant Pest Prevention and Management Program EIR will help us protect these important resources in full compliance with the California Environmental Quality Act, whether we're cooperating with CDFA or applying our own resources to prevent invasive pests.

Sincerely,

LISA M. LEONDIS
Agricultural Commissioner/
Sealer of Weights & Measures

LML:SP:mp

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
cc: [Laura Petro;](#)
Subject: FW: CDFA Program EIR
Date: Friday, July 22, 2011 9:17:09 AM

From: Jenny Chen [<mailto:hjchen@waterboards.ca.gov>]
Sent: Friday, July 22, 2011 9:03 AM
To: Michele Dias
Cc: Philip Isorena
Subject: Re: CDFA Program EIR

Hi Michele,

Followings are our comments for the Notice of Preparation:

In the NOP, CDFA listed the Water Quality together with the Hydrology in the EIR scope. We request CDFA to separate these two areas and list impact to Water Quality from pesticide applications as an independent item.

Under the Water Quality section, we request CDFA to include the water quality impact from both direct discharges, e.g. pesticide spray drift, and indirect discharge, e.g. pesticide discharge with storm water runoff, discharge of pesticide contaminated plant debris, etc. Additionally, we would like to see the eco-toxicity analysis, e.g. toxicity to aquatic life due to pesticide discharges.

Jenny Chen
Water Resources Control Engineer
State Water Resources Control Board
NPDES Unit
Phone No.: 916-341-5570

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: PEIR Scoping comment: Lodi Winegrape Commissio Letter of Support for PEIR
Date: Monday, July 25, 2011 8:32:00 AM

From: Mark Chandler [<mailto:mark@lodiwine.com>]
Sent: Sat 7/23/2011 3:34 PM
To: Pest PreventionEIR
Subject: Lodi Winegrape Commissio Letter of Support for PEIR

To: CDFA Pest Prevention Management Program

From: Lodi Winegrape Commission

Re: PEIR

On behalf of its 700 winegrower constituents in the Lodi wine region, at its July 23, 2011 meeting the Lodi Winegrape Commission board passed a motion in support of the PEIR.

We agree with the goal of having a statewide program that will allow for time-sensitive and efficient evaluation of pest management strategies that can be implemented by CDFA and its partners. We strongly endorse more rapid and effective prevention, eradication and control of pest infestations statewide. In these days of enhanced globalization, we are exposed to an increased risk of a broader range of exotic pests that threaten our industry and the state's economy. We feel the PEIR is in the best interests of agriculture, consumers and the citizens of California.

If you require any additional information or clarification regarding our support, please feel free to contact me.

Mark Chandler
Executive Director
Lodi Winegrape Commission
2545 W. Turner Road
Lodi, CA 95242
209.367.4727

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR Scoping Comments
Date: Monday, July 25, 2011 8:30:23 AM

From: Charlotte Shoemaker [\[mailto:charshoes@sbcglobal.net\]](mailto:charshoes@sbcglobal.net)
Sent: Sat 7/23/2011 12:53 PM
To: Pest PreventionEIR
Subject: PEIR Scoping Comments

My name is Charlotte Shoemaker, and I live in Berkeley, California.

I would like to share the following questions and concerns regarding the Notice of Preparation and the scope of the proposed Statewide Plant Pest Prevention Programmatic Environmental Impact Report:

1) It is not clear in the Notice of Preparation what steps CDFA would take before carrying out, for example, wide-area pesticide spraying such as was done for the light brown apple moth in 2007.

When and how will I, and other members of the public, have a meaningful voice and ability to influence CDFA's future pest management activities, which could involve spraying my community or my food with pesticides?

It is not acceptable to propose a scope for this PEIR that would take away my right to stop or affect state actions that would have a direct impact on my health and the health of my family.

2) The NOP mentions human health only as one of several program objectives. The primary goal for this EIR should be to find alternative ways to manage pests so as to eliminate adverse human and environmental health impacts created by pest management activities.

3) The "Program Components" outlined in the NOP should describe CDFA's plans to develop a system for evaluating human and environmental health impacts from the treatments considered in the Statewide Program, and ways to minimize or eliminate those impacts. It is not enough to simply state in the NOP that a program objective is to minimize impacts to human health and the environment. The PEIR should include the specific plans for achieving that objective in the program.

4) The NOP relies on the same outdated assumptions and approach to pests that CDFA has been using for decades: quarantine, and eradication or containment. This approach does not work as we have

seen with the repeated quarantine and eradication projects for the same pests year after year. The NOP makes inaccurate statements, such as that pests often spread rapidly and can be eradicated if rapid action is taken although we know based on prior experience that in general pests do not spread rapidly and that eradication has seldom if ever succeeded.

Why does the PEIR rely on CDFA's past practices when new science from our own state universities is available to update the current approach so that it is more effective, less toxic and far less burdensome to our farmers? Where are the provisions in this PEIR for modernizing and updating the state's approach to pests, to take advantage of this new scientific research and technology and to eliminate the use of toxic chemicals and quarantines that can be devastating to farmers?

Sincerely,

Charlotte Shoemaker

1618 Parker St.
Berkeley, CA 94703
510 540 7185

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR Scoping Comment
Date: Monday, July 25, 2011 8:31:54 AM

From: Claudia Tomaso [\[mailto:catomaso@sbcglobal.net\]](mailto:catomaso@sbcglobal.net)
Sent: Sat 7/23/2011 1:51 PM
To: Pest PreventionEIR
Cc: Assemblymember.Huffman@outreach.assembly.ca.gov
Subject: against PEIR recommendations

Michele Dias
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Dear Ms. Dias,

I writing today as a concerned citizen of Marin County. It is amazing to me we are still debating the merits of aerial spraying in our local communities when public sentiment is overwhelming against this action.

I am against the California Department of Food and Agriculture (CDFA) using the Environmental Impact Report (EIR) to support Statewide Plant Pest Prevention and Management Program. I am against all treatments included in the Programmatic Environmental Impact Report (PEIR).

Pest control can and has been done effectively at local levels and should continue on this level so local residents can participate and are not held hostage to the state's agriculture/big business interests. Health comes first in California.

Thank you for recognizing this.

Claudia Tomaso
90 Tamalpais Road
Fairfax, CA 94930

July 25, 2011

Ms. Michelle Dias
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

Dear Ms. Dias:

I wish to submit the following comments regarding the preparation of the Statewide Plant Pest Prevention and Management Program Environmental Impact Report (PEIR):

1. The development of a broad based EIR is critical to the continued response to invasive pests and diseases that impact our States agricultural programs and the ecology of the State in general. Invasive pests have created extensive damage to the State for over 150 years of recorded history. Various organizations have calculated the frequency of invasions so I will not attempt to quote a figure; however, we have seen a significant increase of new pests in the past 30 years. Each time a new pest enters a new EIR is required to meet the challenge of treatment.
2. Current protocol of creating separate EIR's for each new invasion just delays the process and creates a challenge to the Department to meet the public's expectation for CEQA compliance. By having a central base of information under the proposed EIR, many of the CEQA questions will have been addressed before the treatments begin. There may be specific questions to the pest that will require additional studies, however having a base to operate from will speed the overall process and help relieve many of the questions raised by the public during the development of the response program.
3. It is important that the preparation process of the EIR take into consideration the extensive use of IPM strategies throughout the State. Many of the protocols have been already developed through the University of California system along with input from other institutions around the country. These systems include the best use of available tools including bio-control agents and bio-pesticide. Sterile Insect Technique and Mating Disruption are also elements of a successful IPM program that need to be considered. It is also critical that the evaluation of these tools take a critical look at the level of development of the systems so that a technique that looks good on paper but is not fully developed does not end up as a final recommendation.

I will not take time to list the importance of the Citrus Industry to the California economy, other have done an adequate job of telling that story. I will say that the industry is fully committed to following the CEQA process. The impact of this EIR goes well beyond the scope of production agriculture and will help in dealing with a very wide range of invasive pests. I fully support the efforts and I am willing to help in any way possible to see this process successful.

Sincerely,

Ted Batkin, President
California Citrus Research Board
ted@citrusresearch.org



Via Electronic Mail and U.S. Mail

July 25, 2011

Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814
PEIR.info@cdfa.ca.gov

Re: Notice of Preparation of a Draft Environmental Impact Report for the Statewide Plant Pest Prevention and Management Program

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) on the Program Environmental Impact Report (“PEIR”) for the California Department of Food and Agriculture’s (“CDFA”) Statewide Plant Pest Prevention and Management Program (“Statewide Program”). The Center would like to thank the CDFA for giving the public an opportunity to comment on the Notice of Preparation (“NOP”). These comments concern potential impacts of the Statewide Program and suggested mitigation measures and alternatives, with a particular focus on pesticides. These comments should be included and addressed in the Draft PEIR.

Pesticides are dangerous to California species, habitat, water quality, air quality and humans. The Center supports CDFA in the development of a plant pest management program that avoids or minimizes the application of pesticides and the adverse impacts associated with pesticide contamination. Further, the Center opposes the broad scope of the PEIR without further environmental analysis as the Statewide Program is implemented. We encourage CDFA to conduct further analysis under the California Environmental Quality Act (“CEQA”) that will facilitate an adequate analysis of the Statewide Program’s impact on various species and geographical regions.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 320,000 members and e-activists throughout California and the greater United States, including residents of cities and counties in California that will be impacted by the Statewide Program. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for the people of California.

I. The Statewide Program

CDFA, as the lead agency, is developing a PEIR for a proposed Statewide Plant Pest Prevention and Management Program. The Statewide Program will evaluate CDFA's prevention and management activities that are currently in place, evaluate those likely to occur in the reasonably foreseeable future, and authorize select management tactics for a variety of plant pests.

II. CEQA Compels CDFA to Identify and Disclose Actual and Potential Significant Environmental Impacts and to Adopt Feasible Mitigation Measures and Alternatives

CEQA was enacted to require public agency decision makers to document, analyze and disclose the environmental impacts of their actions. "CEQA compels government to first identify the [significant] environmental effects of projects, and then to mitigate those adverse effects through the imposition of feasible mitigation measures or through the selection of feasible alternatives."¹ CEQA requires a finding of significance if a project results in "a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."² The CEQA Guidelines require disclosure of significant impacts even where the project only has the "potential" to adversely affect the environment.³

When it comes to significant impacts on wildlife, a lead agency is required to disclose significant impacts if the project has the potential to "substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare or threatened species."⁴ CEQA Appendix G, which implements the Guidelines, requires the agency to determine whether the project has potentially significant impacts because the project could "[h]ave a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species."⁵ CDFA's PEIR must disclose actual and potential significant impacts that the Statewide Program has on or endangered, rare, threatened, candidate, sensitive or special species populations and their habitats.

CDFA must identify significant and potentially significant environmental impacts of the Statewide Program in the PEIR. Specifically, CDFA must identify impacts to air quality, water quality, soil, plant and animal communities, and impacts to endangered, rare, threatened, candidate, sensitive and special species. CDFA must also document, disclose,

¹ *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1233.

² CEQA Guidelines § 15382.

³ CEQA Guidelines § 15002(a)(1); 15065(a); 15382, App. G.

⁴ CEQA Guidelines § 15065(a)(1).

⁵ CEQA Guidelines App.G. § IV.(a).

consider and adopt all feasible mitigation measures and alternatives in the draft and final PEIR.

A. The Adverse Impacts of Pesticides on California Species

The Center is supportive of CDFA developing pest management practices that avoid pesticides and use less toxic alternatives. The Center released a report in 2004, *Silent Spring Revisited*, which catalogues some of the dangers modern pesticide application poses on the environment.⁶ If the Statewide Program PEIR endorses pesticide use, then CDFA will need to analyze the impacts discussed below.

1. Pesticides Pose a Myriad of Dangers to Species and Habitats

Over two billion pounds of pesticides are used each year in the United States to control weeds, insects and other organisms.⁷ The adverse impacts of pesticides have been on the public consciousness since Rachel Carson published *Silent Spring* in the 1960s, where she examined the devastating impacts of pesticides on the environment and on birds in particular. Although the composition and use of pesticides has somewhat changed since that time, pesticides remain dangerous chemicals. As such, pesticides should be avoided if possible and any application should be the result of a fully informed and calculated analysis.

As pesticides enter the environment, they can have acute, ongoing or fatal effects on species and can contaminate habitats. The effects of pesticides can either be direct (ie: an individual species suffers from the toxic effects of a pesticide entering its habitat), or indirect (ie: species ingests contaminated food source).⁸ While death is the most obvious and extreme effect of pesticide contamination, sublethal effects can occur at much lower contamination concentrations.⁹ Sublethal effects can include impaired growth and development, malformations, reduced reproductive success, immune suppression and more.¹⁰ Sublethal effects can also render a species more susceptible to injury, disease or predation.¹¹ Finally, while individual pesticides can result in significant adverse impacts, the simultaneous impacts of separate pesticides have a greater total effect than the sum of their individual impacts.¹² This phenomenon is referred to as “synergistic” or “cumulative” impacts and the phenomenon can amplify the adverse effects of contamination by as much

⁶ Litmans, B., et al. *Silent Spring Revisited: Pesticide Use and Endangered Species*, A Center for Biological Diversity Report, 2004.

http://www.centerforbiologicaldiversity.org/publications/papers/Silent_Spring_revisited.pdf.

⁷ Environmental Protection Agency Office of Pesticide Programs, FY 2002 Annual Report, *Promoting Safety for America's Future*, page 6; Miller, J., et al., *Poisoning Our Imperiled Wildlife, San Francisco Bay Area Endangered Species at Risk from Pesticides*, A Center for Biological Diversity Report, Feb. 2006, <http://www.biologicaldiversity.org/publications/papers/bayareapesticidesreport.pdf>, page 3.

⁸ Litmans page 16.

⁹ Rohr, J.R., et al. *Lethal and Sublethal Effects of Atrazine, Carbaryl, Endosulfan, and Octylphenol on the Streamside Salamander*, Environmental Toxicology and Chemistry, Vol. 22, No. 10, pp. 2385-2392, 2003.

¹⁰ Rohr.

¹¹ Rohr; Litmans page 19.

¹² Litmans page 13.

as 1,000 times.¹³ CDFA must analyze the direct, indirect, acute, ongoing, fatal and sublethal, and the cumulative and synergistic impacts that pesticides have on species and habitats in the PEIR.

In order to fully capture the impacts of pesticide application, the PEIR must include analysis of pesticide drift and runoff. After pesticide application, pesticides may and often do travel from the application site. Two methods of pesticide transportation are pesticide drift and pesticide runoff. Pesticides drift occurs when any airborne pesticides travel away from the application site¹⁴. Drift can result after aerial application or from wind that moves across contaminated soils. A pesticide can become airborne by attaching to vectors like water droplets, dust, soil particles, or by vapor application. The National Research Council has found that aerial application results in “considerable” off-site drift.¹⁵ More than 90% of pesticides used in California are prone to pesticide drift because they are applied via sprays, dust or gaseous fumigants.¹⁶

Agricultural and urban runoff also transports pesticides from application sites. Pesticide transportation via runoff can occur when pesticides either dissolve in water or bound to soil particles. Contaminated runoff can impact plant and animal species in acute, chronic or fatal ways. Pesticides can collect in sediment in the beds of water bodies and can persist in this form sometimes in concentrations too low to be detected by conventional sampling methods. Animals that live at the bottom of these water bodies, like clams and insects, can be particularly susceptible to contamination and they may eventually become food for other species.

CDFA must analyze endocrine disruptors when drafting the PEIR for the Statewide program. Even low doses of pesticides can have drastic impacts on wildlife. To illustrate, pesticides that act as “endocrine disruptors” can be particularly damaging. Endocrine disruptors are synthetic chemicals that mimic hormones and disrupt an organism’s natural processes by blocking naturally occurring hormones or by disrupting the body’s normal functions.¹⁷ As an example, Atrazine, a commonly used herbicide, was one of the most widely detected pesticides in the USGS studies¹⁸ and the synthetic chemical is an endocrine disruptor.¹⁹ At merely 0.1 parts per billion (a level far below the level established by EPA as safe for aquatic organisms), atrazine has been found to disrupt the development of sex characteristics in frogs, preventing the development of masculine characteristics and in some

¹³ Litmans page 13.

¹⁴ Cox, C., *Pesticide Drift, Indiscriminately From the Skies*, Journal of Pesticide Reform, Vol.15, No.1, Spring 1995, pp. 2-6.

¹⁵ Litmans page 4; National Research Council, Board on Agriculture, Committee on Long-Range Soil and Water Conservation, *Soil and Water Quality: An Agenda for Agriculture*, 1993, page 323.

¹⁶ Kegley, S., et al. *Second Hand Pesticides: Airborne Pesticide Drift in California*, Californians for Pesticide Reform, 2003, <http://www.pesticideresearch.com/docs/SecondhandPcides.pdf>.

¹⁷ Litmans page 5.

¹⁸ Larson page 29.

¹⁹ Litmans page i; Hayes, T.B., et al., *Hermaphroditic demasculinized frogs after exposure to the herbicide atrazine at low ecologically relevant doses*, Proc. Natl. Acad. Sci., April 16, 2002, Vol.99, Issue 8, 5476-5480.

cases resulting in hermaphroditism.²⁰ Endocrine disruptors are also incredibly hazardous to humans and the synthetic chemicals are linked to testicular damage and developmental neurotoxicity.²¹

2. CDFA Must Analyze Current and Projected Pesticide Contamination Levels in the PEIR

California air, waterways and species are impacted by pesticide contamination; CDFA must analyze the extent of pesticide contamination in the PEIR. Over the last decade, the U.S. Geological Survey (“USGS”) conducted a series of nationwide water quality studies and released reports documenting pesticide prevalence throughout the nation’s waterways.²² The studies analyzed water samples from 58 rivers and streams across the country, assessing occurrence and distribution of pesticides.²³ USGS tested for forty-six pesticides and pesticide degradation products which represents 70% of the mass of pesticides applied annually in national agricultural use.²⁴ USGS found that the water bodies tested were contaminated with pesticides and that the contamination almost always consisted of a mixture of several different pesticides.²⁵

The reports indicate that pesticide contamination is particularly high in streams and groundwater surrounding agricultural or urban development.²⁶ USGS found that “[a]lmost every sample of water and fish from streams and major rivers in all land use settings contained at least one of the pesticides that we measured. This means that, throughout the nation, almost every time and place you observe a stream or river in a populated area you are looking at water that contains pesticides, inhabited by fish that contain pesticides.”²⁷ Since pesticides are particularly pervasive in waterways, aquatic species are particularly vulnerable to the adverse impacts of pesticide contamination. The PEIR must analyze contamination levels throughout California’s waterways and must determine the risks posed to aquatic species.

USGS reported common detection of pesticide degradation products. These products persist in the environment longer and were found in higher concentrations than their parent pesticide compounds. As an example, over a two-year period, herbicide breakdown products were detected at more than 10 times the concentration of the parent herbicide

²⁰ Litmans page 11; Hayes page 5476-5480.

²¹ Litmans page 5.

²² Larson, S.J. et al, *Pesticides in Streams of the U.S. – Initial Results from the National Water-Quality Assessment Program* (“NWQA”), USGS Water Resources Investigation Report 98-4222, 1999. <http://water.usgs.gov/nawqa/pnsp/pubs/wrir984222/>.

²³ Larson page 8.

²⁴ Larson page 12.

²⁵ Larson page 34.

²⁶ Gilliom, R., *Pesticides in U.S. Streams and Groundwater*, Environmental Science & Technology, May 15, 2007, page 3409.

²⁷ Litmans page 1.

compounds.²⁸ Therefore, in order to accurately assess pesticide persistence and impacts, the PEIR must adequately measure and analyze pesticide degradation products.

The best way to analyze the impacts of a pesticide is to assess the contaminant's effects (or toxicity) and the degree to which it is contained or to which it spreads. In order to fully understand the impacts that the Statewide Program will have on species and habitat, the PEIR must provide a complete picture of current pesticide contamination throughout California. CDFA should assess concentrations through daily and seasonal monitoring to reflect seasonal and climatic variations. The agency should also test for all pesticides currently and historically used in California and their degradation products so that CDFA has an accurate picture of how long pesticides endure in our environment.

B. If CDFA Uses Pesticides in the Statewide Program, CDFA Must Analyze Pesticide Impacts on California ESA and CESA-Listed Species

The attached Appendix A consists of a list of individual species located within California that are listed under the Federal ESA, the CESA, or both. The chemicals listed under the individual species are pesticides that have been identified as toxic to the taxa (ie: mammal, bird, insect, fish, reptile, mollusk, crustacean) to which the species at issue belongs. The Center prepared the content of Appendix A in connection with an ongoing lawsuit²⁹ with the help of an expert scientist, Dr. Susan Kegley. Dr. Kegley is an organic chemist who has an “expertise in pesticide toxicology, pollutant fate and transport, environmental monitoring and analytical chemistry; and experience with pesticide regulation, pesticide data sources and the pesticide toxicology and epidemiology literature.”³⁰

Below is a summary of the species listed in Appendix A that may be adversely impacted by pesticides identified as toxic to their taxa. Should CDFA endorse management tactics or projects that utilize pesticides, pesticides that are toxic to the taxa to which the species belongs may adversely affect the following species and must be analyzed in the PEIR:

Amphibians:

Arroyo toad, *Bufo californicus*; California tiger salamander (Central California DPS, except for Bay Area Counties), *Ambystoma californiense* (Central California DPS); California tiger salamander (Santa Barbara County DPS), *Ambystoma californiense* (Santa Barbara DPS); Mountain yellow-legged frog (Southern California DPS),

²⁸ Litmans page 7

²⁹ *Center for Biological Diversity et al. v. Environmental Protection Agency et al.*, No. 3:11-cv-00293-JCS (N.D. Cal. filed Jan. 19, 2011), see “Exhibit A.”

³⁰ *Pesticide Research Institute, PRI Staff*. <http://www.pesticideresearch.com/staff.html>. Website last modified on March 3, 2011; accessed on July 21, 2011.

Rana muscosa; Santa Cruz long-toed salamander, *Ambystoma macrodactylum croceum*.

Birds:

California condor, *Gymnogyps californianus*; California least tern, *Sterna antillarum browni*; Coastal California gnatcatcher, *Polioptila californica californica*; Light-footed clapper rail, *Rallus longirostris levipes*; Northern spotted owl, *Strix occidentalis caurina*; San Clemente loggerhead shrike, *Lanius ludovicianus mearnsi*; Southwestern willow flycatcher, *Empidonax traillii extimus*; Western snowy plover (Pacific DPS), *Charadrius alexandrinus nivosus* (Pacific DPS).

Crustaceans:

Conservancy fairy shrimp, *Branchinecta conservatoria*; San Diego fairy shrimp, *Branchinecta sandiegonensis*; Shasta crayfish, *Pacifastacus fortis*.

Fish:

Bonytail chub, *Gila elegans*; Bull trout (U.S. DPS), *Salvelinus confluentus* (U.S. DPS); Colorado pikeminnow, *Ptychocheilus lucius*; Desert pupfish, *Cyprinodon macularius*+*Cyprinodon eremus*; Lost River sucker, *Deltistes luxatus*; North American green sturgeon (southern DPS), *Acipenser medirostris* (southern DPS); Razorback sucker, *Xyrauchen texanus*; Santa Ana sucker, *Catostomus santaanae*.

Insects:

Behren's fritillary (Behren's silverspot), *Speyeria zerene behrensii*; Callippe silverspot, *Speyeria callippe callippe*; Delhi Sands flower-loving fly, *Rhaphiomidas terminatus abdominalis*; Kern primrose sphinx moth, *Euproserpinus euterpe*; Lange's metalmark, *Apodemia mormo langei*; Myrtle's silverspot, *Speyeria zerene myrtilae* (*sensu lato*); Ohlone tiger beetle, *Cicindela ohlone*; Quino checkerspot butterfly, *Euphydryas editha quino*; San Bruno elfin, *Callophrys mossii bayensis*; Zayante band-winged grasshopper, *Trimerotropis infantilis*.

Mammals:

Amargosa vole, *Microtus californicus scirpensis*; Buena Vista Lake ornate Shrew, *Sorex ornatus relictus*; Fresno kangaroo rat, *Dipodomys nitratoide exilis*; Giant kangaroo rat, *Dipodomys ingens*; Morro Bay kangaroo rat, *Dipodomys heermanni morroensis*; Riparian brush rabbit, *Sylvilagus bachmani riparius*; Riparian woodrat, *Neotoma fuscipes riparia*; San Joaquin kit fox, *Vulpes macrotis mutica*; Stephen's kangaroo rat, *Dipodomys stephensi*; Tipton kangaroo rat, *Dipodomys nitratoide nitratoide*.

Mollusks:

Morro shoulderband snail, *Helminthoglypta walkeriana*.

Reptiles:

Blunt-nosed leopard lizard, *Gambelia sila*; Coachella Valley fringe-toed lizard, *Uma inornata*; Desert tortoise (Mojave DPS), *Gopherus agassizii*; Giant garter snake, *Thamnophis gigas*.

C. The Ambiguous Language in the NOP Suggests that the Scope of the PEIR is too Broad for CDFA to Adequately Satisfy CEQA

The scope of the Statewide Program is exceedingly broad and covers all current and potential CDFA plant pest management activities that occur anywhere throughout the state of California. The Center believes that it is impossible for a single PEIR to sufficiently analyze environmental impacts, feasible mitigation measures and alternatives on a management tactic or project level.

It is unclear from the language of the NOP whether CDFA believes it is required to conduct subsequent CEQA analysis, or if all CEQA obligations are fulfilled after the issuance of the PEIR. The NOP explains that “[t]o the extent that the impacts of the activities described [] are addressed in the program EIR, no additional CEQA compliance would be necessary.”³¹ This language suggests that CDFA may anticipate fulfilling CEQA requirements on a management tactic or project level with a single PEIR.

In another instance, the CDFA notes that the PEIR “will provide a program framework that can be used for subsequent CEQA analysis, including tiering of project-level CEQA documentation for [] plant pest prevention and management activities... and [] integration of new prevention and management tactics and new plant pests.”³² Again, it is unclear whether CDFA intends to create a framework that would eliminate the need for future CEQA compliance, or if CDFA intends to release tiered EIRs per management tactic or project. If CDFA intends to conduct future CEQA analysis or documentation, CDFA should specifically state so and explain how future CEQA obligations will be triggered.

Given the size and geological diversity of California, the Center advises CDFA to either abandon the broad scoped PEIR in favor of several narrower scoped EIRs or to focus the PEIR on broad Statewide Program objectives and then release a series of tiered narrowly scoped EIRs per management tactic or project. California is rich in natural and agricultural diversity and includes regions of mountains, deserts, wetlands and forests. California is both urban and rural and the climate ranges from Mediterranean to subarctic. The state is similarly rich in biological diversity and hosts hundreds of endangered, rare, threatened, candidate, sensitive and special species. It would be not only impossible but also cost prohibitive to attempt to sufficiently analyze individual management tactics and projects under a single PEIR given the state’s diversity.

³¹ NOP page 3.

³² NOP page 2.

The Center urges CDFA to commit to releasing smaller scoped EIRs to properly analyze the impacts, feasible mitigation measures and alternatives for individual management tactics and individual projects.

D. A Broad Scoped PEIR Would Deny Interested Stakeholders the Ability to Meaningfully Participate in the Decision Making Process Thereby Frustrating CEQA's Goal of Affording Public Participation

“[A] paramount consideration [in the CEQA process] is the right of the public to be informed in such a way that it can intelligently weigh the governmental consequences of any contemplated action and have an appropriate voice in the formation of any decision.”³³ If CDFA intends to approve individual management tactics or projects under the umbrella of the Statewide Program PEIR analysis, CDFA will seriously disable public participation. Meaningful public comments cannot be given if the scope of the project is broad enough to encompass every geographic area of California. Since the PEIR is so broad, there is no way for an interested stakeholder to know if or how a subsequent management tactic or project approved under the PEIR analysis would impact their local community. If there is insufficient warning in the PEIR of a subsequent project, then an interested stakeholder cannot meaningfully participate in the decision making process.

Even though CDFA claims that it “conducts public outreach for all of its pest management activities, regardless of whether CEQA compliance is required,”³⁴ public participation is not compelled. If an interested stakeholder is unaware at the PEIR phase that the broad scoped analysis will be used to approve subsequent management tactic or project years after the final PEIR is certified, the interested stakeholder has been shut out from meaningfully engaging in the CEQA process.

Issuing multiple or tiered EIRs ensures meaningful public participation through CEQA safeguards. CDFA must analyze actual and potential impacts on biological resources including individual endangered, threatened and special species, impacts on water quality, air quality, land use and human health at the management tactic and project level. CDFA should also properly analyze the character and impact of any hazardous or toxic materials that are used in the application of a management tactic or program.

The Center urges CDFA to either abandon the pursuit of the PEIR in favor of smaller scoped EIRs or to maintain the PEIR and commit to releasing subsequent EIRs per management tactic or project. The Center believes that smaller scoped EIRs are necessary to properly inform interested stakeholders of the potentially adverse impacts of management tactics or projects and that they are necessary to satisfy CEQA obligations.

³³ *Environmental Planning and Information Council v. County of El Dorado* (3d Dist. 1982) 131 Cal.App.3d 350, 354.

³⁴ NOP page 3.

E. The PEIR Must Analyze and Adopt Feasible Mitigation Measures and Alternatives

CEQA includes a substantive mandate that requires agencies to adopt feasible mitigation measures and or feasible environmentally superior alternatives so as to substantially reduce or avoid significant adverse impacts.³⁵ An acting agency must deny a proposed project if feasible alternatives or mitigation measures exist that would substantially lessen the project's significant impacts.³⁶ To satisfy CEQA obligations, an Environmental Impact Report ("EIR") must adopt feasible mitigation measures and alternatives.³⁷ The EIR must consider a "reasonable range of alternatives to the project, or to the location of the project, which (1) offer substantial environmental advantages over the project proposal...; and (2) may be 'feasibly accomplished in a successful manner' considering the economic environmental, social and technological factors involved."³⁸

The Center urges CDFA to implement the following mitigation measures:

- Limit the geographic application of pesticides. Prohibit pesticide application in habitats that are designated as critical habitats or candidate habitats under the Federal ESA or the California Endangered Species Act ("CESA"), in non-designated habitats that are occupied by federally or state listed species or sensitive species, in sensitive habitats and in riparian areas. Prohibit pesticide application within the vicinity of sensitive receptors (ie: no application around childcare facilities, eldercare facilities, hospitals, etc.). Establish buffer zones where no pesticides are sprayed within a certain distance of riparian areas (including subterranean water bodies), critical, candidate and sensitive habitats, and habitat occupied by state or federally listed species.
- Establish and regularly review safety regulations and monitoring requirements that limit the amount of exposure farmworkers have with pesticides.
- Limit the amount or frequency of pesticide use. Only allow pesticide application in ideal weather conditions to minimize the potential for spray drift and pesticide runoff.
- Incorporate pesticide contamination monitoring requirements for every CDFA approved pest management tactic that involves pesticide application. Require contamination monitoring in every project that involves pesticide application and track results in a uniform database. Samples should be collected before and after pesticide application from the surrounding atmosphere, soil, groundwater, nearby water bodies. Samples should be collected throughout the day and at various points throughout the seasons so that seasonal patterns and weather conditions do not distort monitoring results.
- Improve public outreach and notify the surrounding community of pesticide risks

³⁵ Pub. Res. Code §§ 21002, 21081; CEQA Guidelines, §§ 15002, subd. (a)(3), 15021, subd. (a)(2), 15091, subd. (a)(1).

³⁶ *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal.4th 105, 134.

³⁷ Pub. Res. Code § 21100, subd. (b)(3); CEQA Guidelines, §§ 15126, subd. (e), 15216.4.

³⁸ *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566.

- and what the community can do to help prevent the spread of plant pests.
- Create incentives for farmers who voluntarily restrict pesticide application to levels below limitations already imposed by CDFA.

The Center urges CDFA to implement the following alternatives:

- Prohibit the use of all pesticides and only approve management tactics or projects that involve pesticide-free strategies. Create alternative management practices that interfere with pest breeding, only locate plants in areas that are pest-free, utilize crop rotation techniques, engage natural predators, or lure pests away from plants.
- Prohibit the use of the most toxic pesticides including endocrine disruptors.
- Expand the search for less toxic, effective pest management techniques by analyzing programs and techniques that are in use outside of the jurisdiction of CDFA. Look to other states, other countries and the Invasives Vision Process currently in development at U.C. Davis.
- Abandon the idea of a PEIR that analyzes statewide impacts. Create smaller scoped EIRs that are based on individual geographic regions, habitat types, species, pesticides, management tactics or management programs.
- Continue developing the PEIR but also commit to releasing subsequent tiered EIRs based on individual geographic regions, habitat types, species, pesticides, management tactics or management programs. Explicitly indicate what actions will trigger a subsequent EIR.

III. The Statewide Program Must Comply with the ESA

The Federal Endangered Species Act (“ESA”) was enacted to provide a conservation program for endangered and threatened species and the ecosystems upon which those species depend.³⁹ The Statewide Program’s management tactics have the potential to adversely impact federally endangered or threatened species and their habitat because potential pesticide application will likely contaminate species and their habitat.

Section 9 of the ESA makes it illegal for any person (which includes a governmental entity like CDFA) to “take” an endangered species listed under the ESA⁴⁰. “Take” has been defined to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in such conduct.⁴¹ Further, the U.S. Fish and Wildlife Services (“USFWS”), one of the agencies charged with administering the ESA, has defined “harm” to include “significant habitat modification or degradation which actually kills or injures fish or wildlife by significantly impairing essential behavioral patterns, including breeding,

³⁹ 16 U.S.C. § 1531(b).

⁴⁰ 16 U.S.C. § 1538(a)(1)(B).

⁴¹ 16 U.S.C. § 1532(19).

spawning, rearing, migrating, feeding or sheltering.”⁴² CDFA may shield itself from section 9 liability by establishing a Habitat Conservation Plan through negotiations with USFWS.⁴³

To limit CDFA’s section 9 ESA liability, CDFA should adopt pest management tactics and programs that limit or eliminate pesticide application and their associated harms to listed species and their habitats.

If the Statewide Program involves any Federal agency funding, permits or authorizations in connection to the Statewide Program, ESA’s section 7 consultation requirement would apply. The consultation process is designed to prevent jeopardy to listed species or destruction or adverse modification of critical habitat. Section 7(a)(2) requires that “[e]ach Federal agency shall, in consultation with and with the assistance of the [USFWS], insure that any action authorized, funded or carried out by such agency [] is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined by [USFWS] ...to be critical.”⁴⁴ Federal agencies are required to consult with the USFWS to determine whether their actions will jeopardize a listed species’ survival or adversely modify designated critical habitat. If jeopardy to species or destruction or adverse modification will result, the consultation process will identify ways to modify the action in a way that would avoid those results.⁴⁵

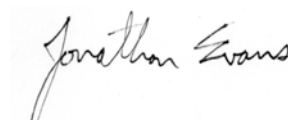
IV. Conclusion

The Center would like to thank CDFA for the opportunity to participate in the decision making process and for their review of these comments. We look forward to working with CDFA in the future to ensure that CEQA requirements are fulfilled. Please send a copy of the Draft PEIR, future notices and any inquiries to Jonathan Evans at the address listed above or by email at jevans@biologicaldiversity.org.

Best Regards,



Elizabeth Thompson
Law Clerk



Jonathan Evans
Staff Attorney

⁴² 50 C.F.R. § 222.102.

⁴³ 50 C.F.R. § 17.3.

⁴⁴ 16 U.S.C. § 1536(a)(2).

⁴⁵ 50 C.F.R. § 402.14 (2011).

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Exhibits Not Enclosed

National Research Council, Board on Agriculture, Committee on Long-Range Soil and Water Conservation, *Soil and Water Quality: An Agenda for Agriculture*, 1993.

Appendix A

ESA and CESA-Listed Endangered and Threatened Species Located in California & Pesticides Known to be Harmful to the Taxonomic Group of that Species that May Adversely Affect the Individual Species

Below is a list of individual species located within California that are under the Federal ESA, the CESA, or both. The chemicals listed under the individual species are pesticides that have been identified as toxic to the taxa (ie: mammal, bird, insect, fish, reptile, mollusk, crustacean) to which the species at issue belongs. The Center prepared the content of Appendix A in connection with an ongoing lawsuit with the help of an expert scientist, Dr. Susan Kegley. Dr. Kegley is an organic chemist who has an “expertise in pesticide toxicology, pollutant fate and transport, environmental monitoring and analytical chemistry; and experience with pesticide regulation, pesticide data sources and the pesticide toxicology and epidemiology literature.”

AMPHIBIANS

Arroyo toad, *Bufo californicus*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion;

Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemecin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazin; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Warfarin and salts; Ziram.

California tiger salamander (Central California DPS, except for Bay Area Counties), *Ambystoma californiense* (Central California DPS)

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxo)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide;

Methyl Bromide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemecin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thien carbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Warfarin and salts; Ziram.

California tiger salamander (Santa Barbara County DPS), *Ambystoma californiense* (Santa Barbara DPS)

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxo)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide;

Methyl Bromide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazin; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thien carbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Warfarin and salts; Ziram.

Mountain yellow-legged frog (Southern California DPS), *Rana muscosa*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion;

Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemecin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazin; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thien carbazon-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Warfarin and salts; Ziram.

Santa Cruz long-toed salamander, *Ambystoma macrodactylum croceum*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxo)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion;

Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemecin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazin; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thien carbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Warfarin and salts; Ziram.

BIRDS

California condor, *Gymnogyps californianus*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Enamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluometuron; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPB and salts; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium

chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

California least tern, *Sterna antillarum browni*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Eamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphotriothioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Coastal California gnatcatcher, *Poliophtila californica californica*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin;

Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Enamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Light-footed clapper rail, *Rallus longirostris levipes*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Enamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb;

Methomyl; Methoxyfenozide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiachloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Northern spotted owl, *Strix occidentalis caurina*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethenamide and isomers; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Enamectin, benzoate; Endosulfan; Ethoprop; Famoxadone; Fenbutatin-oxide; Fenitrothion; Fentin hydroxide; Ferbam; Fluazinam; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPB and salts; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metiram; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propachlor; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Sulfosulfuron; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiachloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon;

Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

San Clemente loggerhead shrike, *Lanius ludovicianus mearnsi*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphotriothioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiadiazinyl; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Southwestern willow flycatcher, *Empidonax traillii extimus*

1080; 2,4-D, salts and esters; 2,4-DB and salts; 3-chloro-p-toluidine hydrochloride; Acephate; Acetochlor; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-

methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Dicrotophos; Difenacoum; Difethialone; Dimethenamide and isomers; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Fentin hydroxide; Fipronil; Flubendiamide; Fluometuron; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPB and salts; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metiram; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Phostebupirim; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Terbufos; Terrazole; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Western snowy plover (Pacific DPS), *Charadrius alexandrinus nivosus* (Pacific DPS)

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethenamide and isomers; Dimethoate; Dimethomorph; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Ethoprop; Famoxadone; Fenbutatin-oxide; Fenitrothion; Fentin hydroxide; Ferbam; Fluazinam; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPB and salts; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metiram; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl;

Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propachlor; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Sulfosulfuron; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiachloprid; Thienencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

CRUSTACEANS

Conservancy fairy shrimp, *Branchinecta conservatio*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acetamiprid; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bifenazate; Bifenthrin; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clomazone; Clonitralid; Clothianidin; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; Cyprodinil; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofof; Difenacoum; Difenconazole; Diflubenzuron; Dimethoate; Dinotefuran; Dithiopyr; Diuron; Endosulfan; Endothall and salts; EPTC; Esfenvalerate; Ethalfluralin; Ethofenprox; Famoxadone; Fenamidone; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Fluazifop-P-butyl; Flubendiamide; Fludioxonil; Flumioxazin; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Fosthiazate; Furanone (tanol derivs.); Halofenozide; Hexaflumuron; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Milbemectin (A mixture of $\geq 70\%$ Milbemecin A4, & $\leq 30\%$ Milbemycin A3); Myclobutanil; Nabam; Naled; Napropamide; Nicobifen; N-octyl bicycloheptene dicarboximide; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyriproxyfen;

Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Tebuconazole; Tebufenozide; Tembotrione; Temephos; Terbutylazine; Tetraconazole; Thiacloprid; Thiencazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralomethrin; Tralopyril; Tributyltin-containing compounds; Triclopyr, salts and esters; Triflumizole; Trifluralin; Triticonazole; Ziram.

San Diego fairy shrimp, *Branchinecta sandiegonensis*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acetamiprid; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bifenazate; Bifenthrin; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clomazone; Clonitralid; Clothianidin; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; Cyprodinil; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofof; Difenacoum; Difenconazole; Diflubenzuron; Dimethoate; Dinotefuran; Dithiopyr; Diuron; Endosulfan; Endothall and salts; EPTC; Esfenvalerate; Ethalfluralin; Ethofenprox; Famoxadone; Fenamidone; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Fluazifop-P-butyl; Flubendiamide; Fludioxonil; Flumioxazin; Fluoxastrobil; Fluridone; Fluthiacet-methyl; Fluvalinate; Fosthiazate; Furanone (tanol derivs.); Halofenozide; Hexaflumuron; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Myclobutanil; Nabam; Naled; Napropamide; Nicobifen; N-octyl bicycloheptene dicarboximide; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyriproxyfen; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Tebuconazole; Tebufenozide; Tembotrione; Temephos; Terbutylazine; Tetraconazole; Thiacloprid; Thiencazone-methyl; Thiobencarb; Thiodicarb;

Thiophanate-methyl; Thiram; Tralomethrin; Tralopyril; Tributyltin-containing compounds; Triclopyr, salts and esters; Triflumizole; Trifluralin; Triticonazole; Ziram.

Shasta crayfish, *Pacifastacus fortis*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acetamiprid; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bifenazate; Bifenthrin; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clomazone; Clonitralid; Clothianidin; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; Cyprodinil; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenconazole; Diflubenzuron; Dimethoate; Dinotefuran; Dithiopyr; Diuron; Endosulfan; Endothall and salts; EPTC; Esfenvalerate; Ethalfluralin; Ethofenprox; Famoxadone; Fenamidone; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenproyroximate; Fluazifop-P-butyl; Flubendiamide; Fludioxonil; Flumioxazin; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Fosthiazate; Furanone (tanol derivs.); Halofenozide; Hexaflumuron; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Myclobutanil; Nabam; Naled; Napropamide; Nicobifen; N-octyl bicycloheptene dicarboximide; Oryzalin; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyriproxyfen; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Tebuconazole; Tebufenozide; Tembotrione; Temephos; Terbutylazine; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralomethrin; Tralopyril; Tributyltin-containing compounds; Triclopyr, salts and esters; Triflumizole; Trifluralin; Triticonazole; Ziram.

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Bonytail chub, *Gila elegans*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acetochlor; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazeniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Diquat dibromide; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Fentin hydroxide; Fipronil; Flubendiamide; Fludioxonil; Fluometuron; Fluopicolide; Fluoxastobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metiram; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Phostebupirim; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Quizalofop-ethyl and isomers; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tefluthrin; Tembotrione; Temephos; Terbufos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters;

Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram.

Bull trout (U.S. DPS), *Salvelinus confluentus* (U.S. DPS)

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acequinocyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazeniumdioxy)-copper; Brodifacoum; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clodinafop-propargyl; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Diclofop-methyl; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Diquat dibromide; Dithiopyr; Diuron; Endosulfan; Esfenvalerate; Ethalfluralin; Ethofumesate; Ethoprop; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenoxaprop-P (+/-); Fenoxycarb; Fenpropathrin; Fenproyroximate; Fentin hydroxide; Ferbam; Fluazinam; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluroxypyr 1-methylheptyl ester; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metiram; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Pirimiphos-methyl; Prallethrin; Prodiamine; Propachlor; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyriproxyfen; Quizalofop-ethyl and isomers; Resmethrin; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Sulfosulfuron; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbufos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiophanate-methyl; Thiram; Tolyfluanid; Tralopyril; Triadimenol; Triallate; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram; Zoxamide.

Colorado pikeminnow, *Ptychocheilus lucius*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acetochlor; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazaniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Diquat dibromide; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenproyroximate; Fentin hydroxide; Fipronil; Flubendiamide; Fludioxonil; Fluometuron; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metiram; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Phostebupirim; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Quizalofop-ethyl and isomers; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphotriothioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tefluthrin; Tembotrione; Temephos; Terbufos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol;

Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram.

Desert pupfish, *Cyprinodon macularius*+*Cyprinodon eremus*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxo)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Enamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenproyroximate; Flubendiamide; Fludioxonil; Fluometuron; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thienencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin;

Tralopyril; Triadimenol; Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram.

Lost River sucker, *Deltistes luxatus*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Diclofop-methyl; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Diquat dibromide; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Ethoprop; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenoxycarb; Fenpropathrin; Fenpyroximate; Fentin hydroxide; Ferbam; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metiram; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazin; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propachlor; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Quizalofop-ethyl and isomers; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine;

Sulfluramid; Sulfosulfuron; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Triadimenol; Triallate; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram.

North American green sturgeon (southern DPS), *Acipenser medirostris* (southern DPS)

1,3-Dichloropropene; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbenfenthiol and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clodinafop-propargyl; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Diclofop-methyl; Dicofof; Difenacoum; Difenconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Diquat dibromide; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Ethoprop; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenoxycarb; Fenpropathrin; Fenpyroximate; Fentin hydroxide; Ferbam; Fluazinam; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metiram; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiatrin; Profenofos; Prometryn; Propachlor; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Quizalofop-ethyl and isomers; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-

tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Sulfosulfuron; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Triallate; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram; Zoxamide.

Razorback sucker, *Xyrauchen texanus*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acetochlor; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofol; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Diquat dibromide; Dithiopyr; Diuron; Emamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Fentin hydroxide; Fipronil; Flubendiamide; Fludioxonil; Fluometuron; Fluopicolide; Fluoxastrobin; Fluridone; Fluroxypyr 1-methylheptyl ester; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metiram; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Phostebupirim; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn;

Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Prothioconazole; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Quizalofop-ethyl and isomers; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tefluthrin; Tembotrione; Temephos; Terbufos; Terbutylazine; Tetramethrin; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Triallate; Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram.

Santa Ana sucker, *Catostomus santaanae*

1,3-Dichloropropene; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-iodo-2-propynyl butyl carbamate; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acequinocyl; Acibenzolar-S-methyl; Acrolein; Alachlor; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Ammonium bromide; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bensulide; Bethoxazin; Bifenazate; Bifenthrin; Bis-(N-cyclohexyldiazoniumdioxy)-copper; Brodifacoum; Bromacil and salts; Bromethalin; Bromoxynil, salts and esters; Buprofezin; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chelerythrine chloride-sanguinarine chloride mixt.; Chlorantraniliprole; Chlorfenapyr; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clofentezine; Clonitralid; Coal tar hydrocarbons; Coumaphos; Creosote and creosote oil; Cyazofamid; Cybutryne; Cyfluthrin isomer mixtures; Cyhalofop butyl; Cyhalothrin isomer mixtures; Cymoxanil; Cypermethrin isomer mixtures; Cyphenothrin; Cyromazine; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dicofof; Difenacoum; Difenoconazole; Difethialone; Diflubenzuron; Dimethoate; Dipropyl isocinchomeronate; Dithiopyr; Diuron; Enamectin, benzoate; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Ethofenprox; Ethofumesate; Etoxazole; Famoxadone; Fenamidone; Fenarimol; Fenbuconazole; Fenbutatin-oxide; Fenitrothion; Fenpropathrin; Fenpyroximate; Flubendiamide; Fludioxonil; Fluopicolide; Fluoxastrobin; Fluridone; Fluthiacet-methyl; Fluvalinate; Halofenozide; Hexaflumuron; Hexythiazox; Hydramethylnon; Imiprothrin; Indoxacarb; Iprodione; Isoxaben; Kresoxim-methyl; Lactofen; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metalaxyl and isomers; Metam salts; Methidathion; Methiocarb; Methomyl; Methoprene and isomers; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Milbemectin (A mixture of >=70% Milbemcin A4, & <=30% Milbemycin A3); Nabam; Naled; Nicarbazine; N-octyl bicycloheptene dicarboximide; Nonyl phenol ethoxylates; Oryzalin; Oxadiazon; Oxydemeton-Methyl; Oxyfluorfen; Para-dichlorobenzene; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet;

Phosphine; Picloram and salts; Piperalin; Piperonyl butoxide; Pirimiphos-methyl; Prallethrin; Prodiamine; Profenofos; Prometryn; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyraclostrobin; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Pyrimethanil; Pyriproxyfen; Reactive phosphide salts (Al, Mg); Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Sethoxydim; Siduron; Simazine; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spiromesifen; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tebufenpyrad; Tembotrione; Temephos; Terbutylazine; Tetramethrin; Thien carbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tolyfluanid; Tralomethrin; Tralopyril; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Triclosan; Trifloxystrobin; Triflumizole; Trifluralin; Triticonazole; Warfarin and salts; Ziram.

INSECTS

Behren's fritillary (Behren's silverspot), *Speyeria zerene behrensii*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlordantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofo; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Enamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thien carbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Callippe silverspot, *Speyeria callippe callippe*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlordantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofo; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Enamectin,

benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thien carbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole. CS

Delhi Sands flower-loving fly, *Rhaphiomidas terminatus abdominalis*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofo; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thien carbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Kern primrose sphinx moth, *Euproserpinus euterpe*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofo; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate;

Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thiencarbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Lange's metalmark, *Apodemia mormo langei*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofof; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thiencarbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Myrtle's silverspot, *Speyeria zerene myrtleae* (sensu lato)

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofof; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide;

Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thien carbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Ohlone tiger beetle, *Cicindela ohlone*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofof; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thien carbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Quino checkerspot butterfly, *Euphydryas editha quino*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofof; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin;

Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thiencarbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

San Bruno elfin, *Callophrys mossii bayensis*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofof; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thiencarbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

Zayante band-winged grasshopper, *Trimerotropis infantilis*

Acephate; Acetamiprid; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Atrazine; Avermectin; Azinphos-Methyl; Bifenthrin; Carbaryl; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Clothianidin; Cyfluthrin isomer mixtures; Cyhalothrin isomer mixtures; Cypermethrin isomer mixtures; DDVP; Diazinon; Dicofof; Difenacoum; Diflubenzuron; Dimethoate; Dinotefuran; Emamectin, benzoate; Endosulfan; EPTC; Esfenvalerate; Ethofenprox; Etoxazole; Famoxadone; Fenamidone; Fenhexamid; Fenitrothion; Flubendiamide; Fluridone; Fluvalinate; Fosthiazate; Imidacloprid; Indoxacarb; Inorganic nitrate/nitrite; Malathion; Mefluidide and salts; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl Bromide; Methyl parathion; Metofluthrin; Milbemectin (A mixture of $\geq 70\%$ Milbemcin A4, & $\leq 30\%$ Milbemycin A3); Naled; Oxamyl; Oxydemeton-Methyl; PCNB; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Pinoxaden; Pirimiphos-methyl; Prallethrin; Profenofos; Propoxur; Pyraflufen-ethyl; Pyrasulfotole; Pyrethrins; Pyridaben; Pyridalyl;

Resmethrin; Rotenone; S,S,S-tributyl phosphorotrithioate; Siduron; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Temephos; Tetramethrin; Thiamethoxam; Thiencarbazone-methyl; Thiobencarb; Tralomethrin; Triticonazole.

MAMMALS

Amargosa vole, *Microtus californicus scirpensis*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Buena Vista Lake ornate Shrew, *Sorex ornatus relictus*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone;

Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Fresno kangaroo rat, *Dipodomys nitratoides exilis*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB;

Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Giant kangaroo rat, *Dipodomys ingens*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Morro Bay kangaroo rat, *Dipodomys heermanni morroensis*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Riparian brush rabbit, *Sylvilagus bachmani riparius*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP

(Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Riparian woodrat, *Neotoma fuscipes riparia*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

San Joaquin kit fox, *Vulpes macrotis mutica*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofo; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Stephen's kangaroo rat, *Dipodomys stephensi*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofo; Difenacoum; Difethialone; Dimethoate;

Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

Tipton kangaroo rat, *Dipodomys nitratoide nitratoide*

1080; 10,10'-Oxybisphenoxyarsine; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Alpha-chlorohydrin; Aminopyralid and salts; Amitraz; Atrazine; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Cycloate; Cyfluthrin isomer mixtures; Cypermethrin isomer mixtures; Dazomet; DCPA; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Endosulfan; EPTC; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Flurprimidol; Fluvalinate; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Indoxacarb; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl iodide; Methyl parathion; Metolachlor and isomers; Metribuzin; Naled; Napropamide; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Rotenone; S,S,S-tributyl phosphorotrithioate; Sabadilla alkaloids; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium dimethyl dithio carbamate; Sodium fluoride; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat;

Strychnine; Tebufenozide; Tembotrione; Tetraconazole; Thiacloprid; Thidiazuron; Thiencarbazon-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Warfarin and salts; Zinc Phosphide; Ziram.

MOLLUSKS

Morro shoulderband snail, *Helminthoglypta walkeriana*

2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; 3-Trifluoromethyl-4-nitrophenol; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Antimycin A; Atrazine; Azinphos-Methyl; Azoxystrobin; Benfluralin; Bromacil and salts; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Chromium (VI) compounds; Clonitralid; Coumaphos; Creosote and creosote oil; Cypermethrin isomer mixtures; DCPA; DDVP; Diazinon; Dichlobenil; Dicofol; Diflubenzuron; Dimethoate; Diuron; Endosulfan; Endothall and salts; Esfenvalerate; Ethalfluralin; Famoxadone; Fenitrothion; Flubendiamide; Fluoxastrobin; Fluridone; Fluvalinate; Furanone (tanol derivs.); Halofenozide; Iprodione; Kresoxim-methyl; Linuron; Malathion; Mancozeb; Mandipropamide; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaflumizone; Metal naphthenate salts (Cu, Zn); Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metofluthrin; Naled; Napropamide; Nicobifen; N-octyl bicycloheptene dicarboximide; Oxadiazon; Oxamyl; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Permethrin; Phenothrin; Phorate; Phosmet; Phosphine; Picloram and salts; Pinoxaden; Piperonyl butoxide; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propylene oxide; Propyzamide; Pyrasulfotole; Pyrethrins; Pyridalyl; Resmethrin; Rotenone; S,S,S-tributyl phosphotriothioate; Siduron; Simazine; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirodiclofen; Spirotetramat; Tebufenozide; Tembotrione; Terbutylazine; Thiacloprid; Thiencarbazon-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tributyltin-containing compounds; Triclopyr, salts and esters; Triflumizole; Triticonazole; Ziram.

REPTILES

Blunt-nosed leopard lizard, *Gambelia sila*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflorene, methyl ester; Chlorophacinone; Chloropicrin;

Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Coachella Valley fringe-toed lizard, *Uma inornata*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet;

Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Desert tortoise (Mojave DPS), *Gopherus agassizii*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofof; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluometuron; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPB and salts; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thiencarbazone-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Trichlorfon; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

Giant garter snake, *Thamnophis gigas*

1080; 2,4-D, salts and esters; 3-chloro-p-toluidine hydrochloride; Acephate; Acrolein; Aldicarb; Allethrin stereoisomers, Bioallethrin; Aminopyralid and salts; Amitraz; Antimycin A; Atrazine; Avermectin; Azinphos-Methyl; Benfluralin; Bentazon and salts; Brodifacoum; Bromacil and salts; Bromadiolone; Bromethalin; Bromoxynil, salts and esters; Captan; Carbaryl; Carbendazim and salts; Carbofuran; Chlorantraniliprole; Chlorfenapyr; Chlorflurenol, methyl ester; Chlorophacinone; Chloropicrin; Chlorothalonil; Chlorpyrifos; Chlorpyrifos-methyl; Cholecalciferol; Chromium (VI) compounds; Clothianidin; Coumaphos; Cyclanilide; Cyfluthrin isomer mixtures; Dazomet; DDVP; Diazinon; Dicamba and salts; Dichlobenil; Dichloran; Dichlorprop (2,4-DP), salts and esters; Dicofol; Difenacoum; Difethialone; Dimethoate; Diphacinone and salts; Diuron; Emamectin, benzoate; Endosulfan; Famoxadone; Fenbutatin-oxide; Fenitrothion; Flubendiamide; Fluridone; Forchlorfenuron; Formetanate hydrochloride; Fosthiazate; Hydramethylnon; Imidacloprid; Indoxacarb; Inorganic arsenic compounds; Inorganic nitrate/nitrite; Iprodione; Linuron; Malathion; Mancozeb; Maneb; MCPA, salts and esters; MCPP (Mecoprop) and salts; Mefluidide and salts; Metaldehyde; Methidathion; Methiocarb; Methomyl; Methoxyfenozide; Methyl parathion; Metofluthrin; Metolachlor and isomers; Metribuzin; Naled; Nicobifen; Nonyl phenol ethoxylates; Oxadiazon; Oxamyl; Oxydemeton-Methyl; Oxyfluorfen; Paraquat dichloride; PCNB; Pendimethalin; Pentachlorophenol and salts; Phorate; Phosmet; Phosphine; Pirimiphos-methyl; Profenofos; Prometryn; Propamocarb hydrochloride; Propanil; Propargite; Propiconazole; Propoxur; Propyzamide; Pymetrozine; Pyrasulfotole; Pyridalyl; Pyrimethanil; Reactive phosphide salts (Al, Mg); Resmethrin; S,S,S-tributyl phosphorotrithioate; Sethoxydim; Siduron; Simazine; Sodium chlorate; Sodium cyanide; Sodium Tetrathiocarbonate; Spinetoram and spinosad; Spirotetramat; Strychnine; Sulfluramid; Tebufenozide; Tembotrione; Temephos; Tetraconazole; Thiacloprid; Thien carbazon-methyl; Thiobencarb; Thiodicarb; Thiophanate-methyl; Thiram; Tralopyril; Triadimefon; Triadimenol; Tributyltin-containing compounds; Triclopyr, salts and esters; Trifluralin; Triticonazole; Vinclozolin; Warfarin and salts; Zinc Phosphide; Ziram.

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: Scoping Comments: Statewide PEIR
Date: Monday, July 25, 2011 12:46:01 PM

From: Kris Brewer [<mailto:kris@krbrewer.com>]
Sent: Mon 7/25/2011 12:34 PM
To: Pest PreventionEIR
Cc: Assemblymember.Huffman@outreach.assembly.ca.gov
Subject: Statewide PEIR

July 25, 2011

To Whom It May Concern:

I am writing regarding the California Department of Food and Agriculture's plans to conduct a statewide Programmatic Environmental Impact Report for a Statewide Plant Pest Prevention and Management Program.

I am adamantly opposed to this.

I understand that "the overall goal of this statewide program is to create a vehicle which provides a time-sensitive and efficient framework for evaluating potential environmental impacts of the various pest management activities implemented by CDFA and its partners." However, I believe the goal is also to eliminate the potential for people to actively oppose the CDFA's pest-control methods, including so-called "inerts," which are outdated and toxic to the environment, and to all living things in it.

As we know, the chemical program the CDFA proposed for the Light Brown Apple Moth several years ago would have gone forward were it not for tremendous public outcry. This program would have entailed years of monthly spraying and other methods of chemical distribution to saturate our environment. Yet, even without this program, the LBAM has not devastated California Agriculture as the CDFA threatened it would. How many other false threats will the CDFA insist on treating to the detriment of human and environmental health? A statewide PEIR will only result in speeding up their access to do so.

We cannot take lightly the serious impacts that chemicals, synthetic pheromones and inerts, as well as sterile moths and other insects can have on the health of us all and our environment. There are more sustainable, non-toxic methods of pest control available, and many knowledgeable, experienced people already using them.

Please do not go forward with this PEIR.

Most sincerely,
Kris Richardson Brewer



California State Grange

3830 U Street Sacramento, California 95817

(916) 454-5805 / fax: (916) 739-8189

master@californiagranger.org

July 25, 2011

Karen Ross, Secretary of Agriculture
California Department of Food & Agriculture

Via fax: 916-653-4783

Dear Secretary Ross:

We took interest in your comments at the recent meeting of the Committee for Sustainable and Organic Agriculture. We'd like to take this opportunity to comment on the scope of the Statewide Plant Pest Prevention Programmatic Environmental Impact Report.

The Grange is the oldest agricultural organization in California with 10,000 members in 189 communities. For 140 years, we have supported farmers and healthy communities.

Your commitment to protecting California's crops from invasive pests is laudable, but only if the methods of eradication are sound, safe and consider the impact on our citizens living in farming communities. The Grange supports a holistic approach that supports our farmers and considers the protection and promotion of healthy communities.

The California State Grange urges that any pest eradication program put the interest of public safety FIRST.

Kindest Regards,

Bob McFarland, President
California State Grange



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

July 25, 2011

The Honorable Edmund G. Brown, Jr.
Governor, State of California
State Capitol
Sacramento, CA 95814

Sent via fax: 916-558-3177

Re: California Department of Food and Agriculture (CDFA) Programmatic Environmental Impact Report (PEIR)
for Statewide Plant Pest Prevention and Management Program

Dear Governor Brown:

I am writing on behalf of the California Certified Organic Farmers (CCOF) to underscore the importance, to organic farmers of CDFA's current Statewide Pest Prevention Plan and Management Program and California Environmental Quality Act Project Environmental Impact Review (PEIR) processes. CCOF, founded in 1975, is a non-profit organic certifier, trade association and foundation that represents 2400 organic operations in California and across the country. Nearly 60 percent of our members fall within the USDA small farmer designation, and we also represent many larger companies including Earthbound and Whole Foods.

National organic industry sales grew to \$29 billion in 2010 and California is the largest organic producer in the nation. An effective Pest Prevention Plan and Management program, operating under the following PEIR conditions, is critical to protecting the diversity of California agriculture – and the growing organic sector:

The PEIR should encourage CDFA to develop a hierarchy of choices for pest eradication which starts with preventative and exclusionary measures, runs through cultural and biological choices next, and always includes an organically approved pesticide in the control choices. The PEIR should not replace the Environmental Impact Report (EIR) for individual pest prevention programs, but rather, provide a larger context for valuable individual EIR input.

Recognition of the University of California, Davis definition of Integrated Pest Management (IPM):

A pest management strategy that focuses on long-term prevention or suppression of pest problems through a combination of techniques such as encouraging biological control, use of resistant varieties, and adoption of alternate cultural practices such as modification of irrigation or pruning to make the habitat less conducive to pest development. Pesticides are used only when careful monitoring indicates they are needed according to preestablished guidelines, treatment thresholds, or to prevent pests from significantly interfering with the purposes for which plants are being grown.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cathy Calfo'.

Cathy Calfo, Executive Director/CEO

cc: Karen Ross, Secretary, California Department of Food and Agriculture
Rick Jensen, Director, CDFA Director of Plant Health

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: FW: PEIR Plant Pest Mgmt Program - Comments & Questions
Date: Tuesday, July 26, 2011 11:22:22 AM

From: Glen Chase [<mailto:glenchase@aol.com>]
Sent: Mon 7/25/2011 10:27 PM
To: Pest PreventionEIR
Cc: yphillips@comcast.net Yannick Phillips; fegger@pacbell.net Egger Fairfax;
David Dilworth; glen chase; debbie.friedman@mac.com; Moth Stephan C. Volker,
Attorn
Subject: PEIR Plant Pest Mgmt Program - Comments & Questions

To: Michele Dias
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814

**Statewide Plant Pest Prevention and Management Program
Environmental Impact Report (EIR)**

Public Response: Comments and Questions by Glen Chase, July 25, 2011.

Comment #1:

1. Past Assemblyman Laird requested that an invasive pest management program be developed in advance so that inappropriate, unnecessary and incompetent invasive pest management programs such as the CDFA Light Brown Apple Moth program would never be repeated again.

However, Laird did not intend that his request would result in the CDFA creating a broad management program PEIR attempting to avoid and circumnavigate CEQA law and the required EIR process for each individual pest program and circumstance as they occur as this current CDFA EIR is attempting.

Question #1:

Please list the complete list of errors that were made by CDFA in:

- 1.a Misrepresenting the LBAM program as an "Emergency"
- 1.b Reporting agriculture damage from LBAM to media, elected representatives and the public when in fact no documented LBAM damage had occurred anywhere in the State of California.
- 1.c Aerially spraying a pheromone substance onto 100's of thousands of people, their homes and schools in Santa Cruz and Monterey Counties, yet neglecting to report to them that it was also a category 3 toxin.
- 1.d Aerially spraying a pesticide directly onto people and their homes and doing no

inhalation test for danger under the rational that the pesticide particles were greater in size than 25 microns, when in fact more than half of the particles were less than 10 microns in size, the size known to be able to directly enter the blood stream via the lungs and be extremely damaging and life threatening to the population.

1.e Receiving over 600 reports of illness after the CDFA aerial spray and being alerted to thousands of others who became ill, yet ignoring them all and not responding to a single person who suffered, including the family of the 11-month-old child whose life was saved by opening his airway with steroids, etc. at Community Hospital of Monterey Peninsula following the aerial spray.

Comment #2:

CEQA law has EIR requirements that are TIME sensitive. That is because there have to be cutoff dates or else the EIR would never end as new and additional information could continue to flow in, but the EIR must consider the bundle of current data and issues that are relevant at some time or for some time period during the EIR process.

CEQA law requires the analysis and consideration of the interaction of factors, issues and data that are available at the time or within the time period that the EIR is prepared. Since that time period would be very unlikely to include optimum preparations for interactions with future factors and data, the EIR must be time sensitive to availability of known factors, issues and data currently and the EIR can only be expected to include factors, issues and data relevant to the current time.

The CDFA is attempting at this time to complete a management portion of an EIR for pest programs across the state of California, some which are known today, others that are imagined and still others that haven't even been thought of, as the future is not yet known.

This approach is inappropriate since future issues, factors and data cannot simply be added in later, but they need to interact with each other and the other current factors of their times.

By completing the significant portion of the PEIR today, it marginalizes the issues as they interact in the future and it reduces the ultimate effectiveness of programs due to a heavy anchor fixed into the past.

Environments are often complex and interrelated and the purpose of the EIR is to integrate various factors as they effect each other individually, in complement and as they affect the total environments. To complete the management program portion of all or a substantial number of EIR's to come on this subject is an inappropriate administrative tool that defeats the substantial purpose of the EIR process.

Management programs and processes require change as frequently or more frequently than the issues and factors and data that they manage, so this CDFA attempt to complete the EIR process for the management program portion of pest programs is (1) to ignore the need for flexibility over time to accommodate factors at the time; (2) to lay extra layers of unnecessary bureaucracy and protocol that may not even be relevant at later dates; (3) to make it difficult to move quickly as times, scenarios, needs and priorities change over time

and (4) to make it more difficult to effectively address and protect the environments of the future.

CDFA in the past LBAM EIR process held scoping meetings at locations and times that were near impossible to attend for those people familiar with the subject who wanted to attend such meetings. Even though these members of the public identified times and places they could attend and requested in writing such times and places of CDFA, CDFA ignored their requests and avoided hundreds of people attending and contributing and instead held sessions in areas and times where four or five people were in attendance, rather than hundreds.

CDFA has continuously and consistently spent their time and efforts with strategies to minimize the administrative requirements of the EIR process and even more to avoid the substantive requirements and purpose of the EIR process.

There is no good reason to have to average the effectiveness of an EIR process in six years or eight years from now with an old outdated program that CDFA is now trying to get past the EIR process.

Because the CDFA bungled the EIR process with the Light Brown Apple Moth is not substantiation for CDFA to do an "End run" now and avoid the full scrutiny and scope on what would normally and correctly be multiple EIR's.

Question #2.1

Would CDFA please prepare management plans and programs for their own internal use and to share with the public as they and the public sees fit, but not try to ram these management plans through an EIR process that does not have the complete information that a proper EIR evaluation requires?

Question #2.2

Would the CDFA please prepare EIR's when the specific program circumstances arise as is the method and the intention of the CEQA EIR process?

Comment #3:

I am a professional in developing management systems and it is fine to prepare and consider and plan for a variety of scenarios. But until the actual scenario is identified, it is inappropriate to complete the construction of the actual management system and even more inappropriate to present it for EIR approval. CEQA EIR's are the people's tools to evaluate and protect and effectively handle our environments. The people see no emergency or necessity to rush such that they would want to apply The CEQA EIR process to only a portion of the full issues, data and factors at this time to satisfy the CDFA strategy to piece meal and avoid the true intent of the CEQA EIR process.

Comment #4:

CDFA is attempting to get blanket approval for multiple projects that cannot be appropriately identified to satisfy CEQA EIR requirements at this time.

An example that is similar to what CDFA is doing is as follows. A building contractor, rather than applying for building permits as he identifies each property and building that he intends to build, is instead trying to get a permit for any and all properties and buildings throughout the state based on a management and construction plan, and then to simply add in the individual sights and buildings later on as he selects them. That is NOT legal nor the way it is done in California for obvious reasons. For reasons of CEQA EIR law and for obvious reasons, The CDFA should also not be allowed to do such a thing, should not be allowed to avoid CEQA law regarding EIR.

Comment #5:

The CDFA does NOT have the authority, the reputation or the resume to be granted extreme exceptions to CEQA law nor be allowed to manipulate and violate CEQA EIR law.

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: Scoping Comments: CA Statewide PEIR
Date: Monday, July 25, 2011 12:46:28 PM

From: lisa chipkin [<mailto:lisachipkin@gmail.com>]
Sent: Mon 7/25/2011 12:37 PM
To: Pest PreventionEIR
Cc: Assemblymember.Huffman@outreach.assembly.ca.gov
Subject: CA Statewide PEIR

July 25, 2011

To Whom It May Concern:

I am writing regarding the California Department of Food and Agriculture's plans to conduct a statewide Programmatic Environmental Impact Report for a Statewide Plant Pest Prevention and Management Program.

I am adamantly opposed to this.

I understand that "the overall goal of this statewide program is to create a vehicle which provides a time-sensitive and efficient framework for evaluating potential environmental impacts of the various pest management activities implemented by CDFA and its partners." However, I believe the goal is also to eliminate the potential for people to actively oppose the CDFA's pest-control methods, including so-called "inerts," which are outdated and toxic to the environment, and to all living things in it.

As we know, the chemical program the CDFA proposed for the Light Brown Apple Moth several years ago would have gone forward were it not for tremendous public outcry. This program would have entailed years of monthly spraying and other methods of chemical distribution to saturate our environment. Yet, even without this program, the LBAM has not devastated California Agriculture as the CDFA threatened it would. How many other false threats will the CDFA insist on treating to the detriment of human and environmental health? A statewide PEIR will only result in speeding up their access to do so.

We cannot take lightly the serious impacts that chemicals, synthetic pheromones and inerts, as well as sterile moths and other insects can have on the health of us all and our environment. There are more sustainable, non-toxic methods of pest control available, and many knowledgeable, experienced people already using them.

Please do not go forward with this PEIR.

Sincerely,
Lisa Chipkin, San Rafael, CA

July 25, 2011

Michele Dias, Acting Chief Counsel
Dr. Robert Leavitt, Director Plant Health and Pest Prevention Services
California Department of Food and Agriculture
1220 N Street
Sacramento CA 95814


via email to: PEIR.info@cdfa.gov

Re: NOP Response: Statewide Plant Pest Prevention and Management Program

Thank you for bringing to the attention of the City of Santa Clara Mayor and City Council the Notice of Preparation (NOP) for the California Department of Food and Agriculture's Statewide Plant Pest Prevention and Management Program. City staff have reviewed the materials provided and understand that you have prepared a comprehensive list of issues that will be included and analyzed in the Draft EIR. We would ask that your project description define the role of local governments in administering the program in any way and that the analysis include the possible impacts on local urban communities on an ongoing basis with respect to any hazardous pesticides or any planting restrictions that may be a part of the program.

Please be sure to include us in your list for distribution of the Notice of Completion of the Draft EIR. We look forward to reviewing the Draft EIR when it is made available and providing to you any comments that we may have at that time.

Sincerely,


Kevin L. Riley
Director of Planning and Inspection

cc: Mayor and City Council
City Manager

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July 25, 2011

California Department of Food & Agriculture
Attn: Michele Dias, Acting Chief Counsel
1220 N Street, Suite 400
Sacramento, CA 95814

Dear Ms. Dias:

The California Native Plant Society (CNPS) provides herein our comments regarding the California Department of Food & Agriculture's (CDFA's) Pest Management Programmatic Environmental Impact Report (Pest PEIR).

CNPS is a non-profit organization working to protect California's native plant heritage and preserve it for future generations. Our nearly 10,000 members professional and volunteers who work to promote native plant conservation through 33 chapters statewide.

CNPS recognizes the potential for a statewide Pest PEIR to facilitate the implementation of effective invasive species management practices, by both state agencies and local authorities. Additionally, the Pest PEIR represents an opportunity for a full review and vetting of chemicals to be employed by the Statewide Program which can help clarify concerns over their use.

Our organization also acknowledges the concerns of citizen stakeholders who have expressed strong opposition to the current PEIR effort, and have articulated these concerns in a letter to Governor Brown and Secretary Karen Ross (June 24, 2011), and in meetings with representatives of both CDFA and Governor Brown's office.

The draft PEIR should provide a regulatory means that would allow CDFA or other appropriate agencies to address non-native invasive species effectively through a Statewide Program, while ensuring that management tactics and programs will use tools and methods that do not pose health or environmental risks. We make the following recommendations regarding how the CDFA can ensure more public acceptance of the Pest PEIR and the information assessed within it.

Ensuring public input, providing a methodology for new information, building public trust.

CNPS recognizes that chemical treatments (e.g. herbicides) can be an effective tool for controlling invasive non-native species that impact native vegetation. However, chemical sprays, like other vegetation treatments, have potential adverse effects. The decision of whether or not to use chemicals in a specific invasive species management project should be based on an evaluation of chemical and alternative treatments. The NOP states that the draft PEIR will address discretionary actions including, "(a) methodology for evaluation of environmental impacts related to new pests, pest management tactics, and pest prevention and management programs." Therefore the draft PEIR must clearly describe what methodology will provide for future input and modifications to current management tactics and programs assessed in the PEIR, whereby advances in effective pest management practices resulting from scientific research, which make them less dependent on potentially harmful chemicals and more sensitive to protecting human and environmental health, are incorporated into the Statewide Program.

The "methodology for evaluation" must include the creation of an independent advisory committee that will monitor current practices identified and assessed within the PEIR, as well as novel methods that are effective and less-dependent on chemical pesticides and herbicides and provide objective recommendations to the CDFA.

The "methodology" must also describe how CDFA will be required to respond to recommendations of the independent advisory committee.

The CDFA should convene a series of stakeholder meetings - beyond those already held - during the development of the draft PEIR to solicit stakeholder input on how to integrate new tools and practices into the Statewide Program, and incorporate this input into the Statewide Program as appropriate.

We urge the CDFA not to trade trust for expediency, and to consider these recommendations for a transparent, science-based approach to developing a Pest PEIR that incorporates a broad spectrum of stakeholder input. In this way, the CDFA can build public trust, avoid challenges to the PEIR, and implement an effective, enforceable Statewide Program.

We are concerned that the proposed Pest PEIR is overly broad, and will not be able to adequately address, or even identify, environmental concerns associated with current and future pest management programs. To address this concern, we strongly feel the organization of pest prevention and management information into pest groups, as described in the NOP, should include categories that divide agricultural pests from wildlands pests to further facilitate the use of the PEIR.

Statewide Program Objectives and Guiding Principles

The NOP lists Statewide Program Objectives. In addition to these Program Objectives, CNPS recommends that the CDFA adopt the Statement of Principles developed by the California Invasive Species Advisory Committee (CISAC) as guiding principles for the development of the Pest PEIR:

1. *We are committed to creating a sustainable future for California.*

Managing invasive species is essential to creating a sustainable future for California. Invasive species cause ecological, economic and cultural harm to the natural world and human society. We are committed to reducing these damages in ways that advance environmental stewardship, economic development and social equity, while ensuring human health.

2. *California has tools to address invasive species, but stronger efforts are needed to meet increasing pressures.*

Many local, state and federal agencies provide vital services in preventing, detecting and managing invasive species, but growing domestic and international travel and transport increase California's vulnerability. California needs to build on successful existing programs and develop new efforts to increase its effectiveness at addressing the problem. Given the complex and diverse ways that invasive species reach and impact our State, effective coordination among public agencies and members of the public is essential to good stewardship.

3. *Criteria for decision making must be clear and consistent.*

Prevention and management of invasive species requires strategic decision-making based on a

thorough assessment of the risks posed both by target species and by management tactics. Innovative solutions to complex problems require the best available scientific evidence as well as consistent, transparent criteria that are based on widely shared values and offer broad public benefits.

4. Public engagement is vital.

All Californians have a stake in dealing with invasive species, and all Californians should have a voice in our collective response to the harm they pose to our State. Public agencies must employ transparent methods of making decisions and actively encourage public involvement. When conflicts arise, we believe that mediation, public deliberation and consensus building are preferable to legal action and offer the best routes to wise choices and improved outcomes.

Noxious Weed Control Program

We provide the following comments regarding information that our organization feels should be addressed in the draft PEIR regarding noxious weed control management tactics and programs. These comments are based on our CNPS Herbicide Policy, adopted in 2008, which we provide in full as an attachment to this letter.

CNPS recognizes that herbicide can be an effective tool for controlling invasive non-native plants (weeds) that impact native vegetation. However, herbicide, like other vegetation treatments, has potential adverse effects. The decision of whether or not to use herbicide in a specific weed management project is site-specific, and should be based on an evaluation of herbicide and alternative treatments, especially from an environmental standpoint. Project plans should address the conservation of native plants and their habitat.

We are concerned that when herbicide is used for controlling roadside vegetation, its use should be conducted under a plan that addresses the conservation of native plants and their habitat.

CNPS opposes the use of herbicide in forest management, to maximize timber production by targeting non-timber native species.

The tradeoff between the benefits and costs of using herbicide - either proven or alleged - has made it difficult for the public at large, CNPS members, other organizations, and public agencies to evaluate whether or not to use herbicide.

In the context of native vegetation, CNPS distinguishes between the types of herbicide use that it considers appropriate, and those it considers inappropriate. Where the use of herbicide is appropriate, CNPS offers suggestions that will help ensure that herbicide is used properly. We recommend the CDFA incorporate these recommendations into the Pest PEIR assessment of the Statewide Noxious Weed Control Program:

1. Appropriate Use – Weed management

Herbicide is a potentially useful tool for controlling weedy or invasive plants. However, the following precautions and considerations should be made before herbicide is selected and applied as a treatment in locations where native vegetation may be affected:

A. Compare herbicide and alternative treatments for effectiveness, and for potential impacts, both on the environment and on human beings. Monetary cost should not be the only consideration. Herbicide may be appropriate if it is among the most biologically effective or among the least harmful of the alternatives for the task at hand. The most effective treatment may be a combination of methods.

B. As with all vegetation treatments, herbicide treatment should have clear and achievable objectives, preferably including a gradual reduction or phase-out of the need for continued intervention.

C. Ensure that herbicide is used in accordance with label instructions and applicable laws and regulations, and that it is applied by trained personnel, with sufficient supervision to insure that it is applied in the manner and locations intended.

D. Application personnel must be able to distinguish between the target weeds and native plants, particularly any native plants of concern, and should avoid herbicide drift.

E. Adverse impacts to natural resources, such as pollinators, wildlife, and water, and to people, their property, and cultural resources must be avoided or mitigated.

F. Public notification and posting of herbicide application sites should be required on public lands, and on private lands where the public may be affected, such as near public roads.

2. Use of Concern – Controlling roadside vegetation

In those areas where roadside herbicide use is permissible under public law and policy, it should be done within the context of an approved, long-term and comprehensive management plan that addresses not only maintenance and public safety, but also the conservation of native plants and their habitat. Where feasible, the plan should encourage the establishment of native vegetation of a type that would ultimately reduce the need to continue to use herbicide. The Integrated Roadside Vegetation Management Plan of the state of Iowa is an example of this type of management.¹

3. Inappropriate Use – Post-logging, post-fire treatment to maximize timber-production

CNPS opposes the use of herbicide or any other method of post-fire or post-logging treatment where the main objective is to suppress the natural re-growth of native plants in order to maximize timber production. This practice is likely to have severe and long lasting impacts to forest plant diversity. Among our concerns are the following:

A. **Extent** - Herbicide is currently being used for this purpose on hundreds of thousands of acres of private and public forest lands in California.

B. **Cumulative impact unknown**-If this practice continues, each harvest rotation will likely reduce the presence of non-timber native plants. The specific and cumulative impacts to native seed banks and to biological diversity have not been quantified, nor are they currently being monitored or mitigated by any public or private agency or entity.

C. **May contribute to the risk of wildfire** - It has been observed that herbicide use can contribute to the establishment of a dense understory of non-native grasses likely to increase fire hazard.² When wildfires occur in plantations (a frequent occurrence³), the management response usually includes re-application of herbicide, which may exacerbate the problem.

D. **Poor protections** - The regulatory system currently governing private timberland operations in

¹ State of Iowa. 2007. Integrated Roadside Vegetation Management, website maintained by Roadside Office, University of Northern Iowa, Cedar Falls. Accessed on Tue, Aug. 21, 2007 at <http://www.uni.edu/irvm/>.

² Weatherspoon, C.P., and C.N. Skinner. 1995. An assessment of factors associated with damage to tree crowns from the 1997 wildfires in northern California. *Forest Science*, 41:430-451.

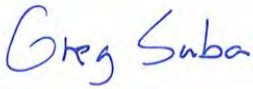
³ Franklin, J.F., and J.K. Agee. 2003. Forging a science-based national forest fire policy. *Issues in Science and Technology*. Fall 2003

California does not provide for the protection of threatened, rare or endangered plant species after logging operations have been completed.

CNPS believes the use of herbicides in commercial forestry is resulting in cumulative impacts that violate California Forest Practice Rules, Subch.2, Art. 1, § 897 (b) (1)-(2) which require the goal of forest management to be forests that are “healthy and naturally diverse, with a mixture of trees and understory plants”.

We appreciate the opportunity to provide comments during the Scoping period of the CDFA's Pest PEIR process. Please accept and fully review our recommendations, and do not hesitate to contact me if you have questions regarding our information.

Sincerely,



Greg Suba
CNPS Conservation Program Director
(916)-447-2677 x-206
gsuba@cnps.org

Attachment: CNPS Herbicide Policy

Protecting California's native flora since 1965

2707 K Street, Suite 1 Sacramento, CA 95816-5113 • Tel: (916) 447-2677 • www.cnps.org

CNPS Policy - THE USE OF HERBICIDE IN SITUATIONS WHERE NATIVE VEGETATION MAY BE AFFECTED (3-08-08)

Policy Statement

1. CNPS recognizes that herbicide can be an effective tool for controlling invasive non-native plants (weeds) that impact native vegetation. However, herbicide, like other vegetation treatments, has potential adverse effects. The decision of whether or not to use herbicide in a specific weed management project is site-specific, and should be based on an evaluation of herbicide and alternative treatments, especially from an environmental standpoint. Project plans should address the conservation of native plants and their habitat.
2. CNPS is concerned that when herbicide is used for controlling roadside vegetation, its use should be conducted under a plan that addresses the conservation of native plants and their habitat.
3. CNPS opposes the use of herbicide in forest management, to maximize timber production by targeting non-timber native species.

Background

The tradeoff between the benefits and costs of using herbicide—either proven or alleged—has made it difficult for the public at large, CNPS members, other organizations, and public agencies to evaluate whether or not to use herbicide.

Goal/purpose

In the context of native vegetation, CNPS distinguishes between the types of herbicide use that it considers appropriate, and those it considers inappropriate. Where the use of herbicide is appropriate, CNPS offers suggestions that will help ensure that herbicide is used properly.

Recommendations

1. Appropriate Use – Weed management

Herbicide is a potentially useful tool for controlling weedy or invasive plants. However, the following precautions and considerations should be made before herbicide is selected and applied as a treatment in locations where native vegetation may be affected:

- A. Compare herbicide and alternative treatments for effectiveness, and for potential impacts, both on the environment and on human beings. Monetary cost should not be the only consideration. Herbicide may be appropriate if it is among the most biologically effective or among the least harmful of the alternatives for the task at hand. The most effective treatment may be a combination of methods.
- B. As with all vegetation treatments, herbicide treatment should have clear and achievable objectives, preferably including a gradual reduction or phase-out of the need for continued intervention.

- C. Ensure that herbicide is used in accordance with label instructions and applicable laws and regulations, and that it is applied by trained personnel, with sufficient supervision to insure that it is applied in the manner and locations intended.
- D. Application personnel must be able to distinguish between the target weeds and native plants, particularly any native plants of concern, and should avoid herbicide drift.
- E. Adverse impacts to natural resources, such as pollinators, wildlife, and water, and to people, their property, and cultural resources must be avoided or mitigated.
- F. Public notification and posting of herbicide application sites should be required on public lands, and on private lands where the public may be affected, such as near public roads.

2. Use of Concern – Controlling roadside vegetation

In those areas where roadside herbicide use is permissible under public law and policy, it should be done within the context of an approved, long-term and comprehensive management plan that addresses not only maintenance and public safety, but also the conservation of native plants and their habitat. Where feasible, the plan should encourage the establishment of native vegetation of a type that would ultimately reduce the need to continue to use herbicide. The Integrated Roadside Vegetation Management Plan of the state of Iowa is an example of this type of management. (1)

3. Inappropriate Use – Post-logging, post-fire treatment to maximize timber-production

CNPS opposes the use of herbicide or any other method of post-fire or post-logging treatment where the main objective is to suppress the natural re-growth of native plants in order to maximize timber production. This practice is likely to have severe and long lasting impacts to forest plant diversity. Among our concerns are the following:

- A. **Extent** - Herbicide is currently being used for this purpose on hundreds of thousands of acres of private and public forest lands in California.
- B. **Cumulative impact unknown** - If this practice continues, each harvest rotation will likely reduce the presence of non-timber native plants. The specific and cumulative impacts to native seed banks and to biological diversity have not been quantified, nor are they currently being monitored or mitigated by any public or private agency or entity.
- C. **May contribute to the risk of wildfire** - It has been observed that herbicide use can contribute to the establishment of a dense understory of non-native grasses likely to increase fire hazard (2). When wildfires occur in plantations (a frequent occurrence (3)), the management response usually includes re-application of herbicide, which may exacerbate the problem.

D. Poor protections - The regulatory system currently governing private timberland operations in California does not provide for the protection of threatened, rare or endangered plant species after logging operations have been completed.

CNPS believes the use of herbicides in commercial forestry is resulting in cumulative impacts that violate California Forest Practice Rules, Subch.2, Art. 1, § 897 (b) (1)-(2) which require the goal of forest management to be forests that are “healthy and naturally diverse, with a mixture of trees and understory plants”.

References cited

1. State of Iowa. 2007. Integrated Roadside Vegetation Management, website maintained by Roadside Office, University of Northern Iowa, Cedar Falls. Accessed on Tue, Aug. 21, 2007 at <http://www.uni.edu/irvm/>.
2. Weatherspoon, C.P., and C.N. Skinner. 1995. An assessment of factors associated with damage to tree crowns from the 1997 wildfires in northern California. *Forest Science*, 41:430-451.
3. Franklin, J.F., and J.K. Agee. 2003. Forging a science-based national forest fire policy. *Issues in Science and Technology*. Fall 2003

Supporting references

California Invasive Plant Council. 2007. Website. Accessed fall 2007 at <http://www.cal-ipc.org>.

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CALIFORNIA
TABLE GRAPE
COMMISSION

392 W. Fallbrook,
Suite 101
Fresno, California
93711-6150
phone: 559.447.8350
fax: 559.447.9184
grapesfromcalifornia.com

July 25, 2011

Governor Jerry Brown
c/o Cliff Rechtschaffen
State Capitol, Suite 1173
Sacramento, CA 95814

Re: Notice of Preparation of a Draft Environmental Impact Report

Dear Governor Brown:

The California Table Grape Commission is the promotional, educational, research and issues management arm of California's fresh grape industry. Established by an act of the California legislature in 1967, the commission's mandate is to promote the sale of fresh grapes by advertising and other similar means for the purpose of maintaining and expanding present markets and creating new and larger intrastate, interstate and foreign markets for fresh grapes. California produces 98 percent of the U.S. fresh table grape production and exports to more than 60 countries with export shipments representing 40 percent of the yield. California's table grape growers understand the complexity of international trade, and pest and disease restrictions play a major part in these complexities.

Invasive pests are a major threat to the California table grape industry. Last year's detection of the European grapevine moth in Fresno County resulted in imposed restrictions on California table grape shipments by some of the industry's leading trade partners, including Canada, Mexico, Australia, New Zealand and South Africa. If a new invasive pest is established, new control methods will have to be adopted to prevent crop damage, which will result in additional pesticide applications, and exported grapes will have to undergo postharvest fumigations in order to prevent its introduction to the country of export.

In response to the threat of invasive pests and plant disease, the California Department of Food and Agriculture (CDFA) proposes creation of a Statewide Plant Pest Prevention and Management Program and accordingly is developing a proposed Environmental Impact Report that would look at a host of potential threats to the state's multi-billion dollar farm economy. The plan is to evaluate the range of plant pest prevention and management activities currently implemented by CDFA and those that are likely to be needed in the near future.

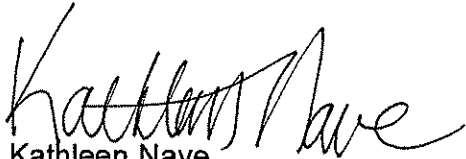
Letter to State Capitol
Page 2 of 2
July 25, 2011

It is critical for California to have this statewide program in place to facilitate rapid and effective prevention, eradication and controls for new or expanding invasive plant pests or disease. Without it, the viability of the state's \$34 billion agricultural industry is at risk.

The commission fully supports the creation of the Statewide Plant Pest Prevention and Management Program and of the proposed Environmental Impact Report by CDFA. We believe this statewide program will result in early detections, smaller infestations and effective eradications of invasive species, which will increase the economic viability of the state's agricultural industry.

Please contact me with any questions.

Regards,

A handwritten signature in black ink, appearing to read 'Kathleen Nave', written in a cursive style.

Kathleen Nave
President

cc: Karen Ross, Secretary, CDFA
Michele Dias, Acting Chief Counsel, CDFA



EARTHJUSTICE

BOZEMAN, MONTANA DENVER, COLORADO HONOLULU, HAWAII
INTERNATIONAL JUNEAU, ALASKA NEW YORK, NEW YORK OAKLAND, CALIFORNIA
SEATTLE, WASHINGTON TALLAHASSEE, FLORIDA WASHINGTON, D.C.

Via Electronic Mail

July 25, 2011

Attention: Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814
PEIR.info@cdfa.ca.gov

Re: CDFA's June 23, 2011 Notice of Preparation of a Draft Programmatic Environmental Impact Report for a Statewide Plant Pest Prevention and Management Program

Dear Ms. Dias:

On behalf of California Environmental Health Initiative, MOMS Advocating Sustainability, and Center for Environmental Health, I submit these comments on the California Department of Food and Agriculture's ("CDFA") June 23, 2011 Notice of Preparation of a Draft Environmental Impact Report for the Statewide Plant Pest Prevention and Management Program ("Pest PEIR"). These groups support sensible management of non-native species in California that protects public health and the environment.

The Statewide Program being considered by CDFA appears to broadly consist of an undisclosed number of plant pest prevention and management programs and activities implemented by CDFA throughout California. The actual environmental impacts of these activities are likely to be far-reaching and highly dependent on site-specific environmental variables, such as geography and climatic conditions. Given the apparent grand scale of CDFA's proposal, it is highly unlikely that CDFA could predict or analyze all of the on-the-ground environmental impacts in the Pest PEIR.

Thus, to comply with CEQA, it is critical that CDFA focus on developing a comprehensive *programmatic* EIR that addresses broad-scale policy issues across CDFA's Statewide Program. It must clearly define the proposed Statewide Program, evaluate alternative pest management approaches, including mitigation measures that could reduce or eliminate potential environmental effects, and comprehensively analyze environmental effects that are reasonably foreseeable at this time.

If, on the other hand, CDFA intends to use the Pest PEIR to "cover" site-specific environmental impacts of future pest management projects, and thereby avoid future CEQA analysis—an objective we disagree with given the broad scope of the Statewide Program—CDFA must clearly explain this in the Pest PEIR so that the public may fully understand the proposal and provide useful comments on it. Any other approach would plainly violate CEQA's public disclosure requirements.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

The Legislature adopted CEQA in 1970 concerned both with protecting environmental resources and with safe-guarding public health and safety. (See Pub. Resources Code, §§ 21000, 21001 [purposes of CEQA include “ensur[ing]” the “long-term protection of the environment” and “identify[ing] critical thresholds for the health and safety of the people of California”].) To that end, CEQA prohibits agencies from approving projects that may cause “significant” environmental effects if there are “feasible alternatives or feasible mitigation measures” that can avoid or “substantially lessen” those effects. (See Pub. Resources Code, § 21002; *Mountain Lion Foundation v. Fish & Game Comm’n* (1997) 16 Cal. 4th 106, 134.)

The primary means of achieving CEQA’s goals is the requirement that government agencies prepare an environmental impact report (referred to as an “EIR”) whenever a proposed project “may have a significant effect on the environment.” (Pub. Resources Code, § 21080(d).) In general, an EIR is an “informational document” that must inform public agency decision makers and the public generally of the proposed project and its significant environmental effects, including direct, indirect, and cumulative effects, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. (See CEQA Guidelines § 15121.)

CEQA provides for different kinds of EIRs depending on the type of project being carried out. The most common type of EIR is a project EIR, which examines the environmental impacts of a specific development project or action. (CEQA Guidelines, § 15161.) A “program” EIR may be prepared “on a series of actions that can be characterized as one large project” and are related either (1) geographically, (2) as logical parts in a chain of contemplated actions, (3) in connection with issuance of rules, regulations, plans, or other general criteria or govern the conduct of a continuing program, or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects. (CEQA Guidelines, § 15168(a).)

After an agency develops a program EIR, it may develop a “tiered” EIR for any projects which arise after the program EIR was prepared and certified. (Pub. Resources Code, § 21094(a).) “Tiering” refers to the “coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared.” (CEQA Guidelines, § 15385.)

When CEQA’s procedures are followed, EIRs ensure that government officials who approve projects “do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account.” (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

DISCUSSION

I. CDFA Must Clearly Inform the Public of the Full Scope and Extent of Pest Prevention and Management Activities That Will Be Assessed in the Pest PEIR.

The purpose of CEQA is to inform the public of the environmental effects of a proposed project. To that end, EIRs must accurately describe the full scope of a proposed project. (See *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193 [“An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.”].) Where, as here, an agency prepares a program-level EIR for numerous activities within its jurisdiction, it is imperative that the agency clearly inform the public whether the EIR will serve as a program- or project-level EIR. Otherwise, the public will not be fully informed of the extent of environmental impacts being assessed in the EIR.

Unfortunately, the June 23, 2011 Notice is confusing and vague as to the scope and extent of activities that will be analyzed in the Pest PEIR. Especially confusing is the extent to which CDFA plans to rely on the Pest PEIR to provide “CEQA coverage” for future site-specific pest prevention and management activities. (Notice at 3.) On the one hand, the Notice suggests that the Statewide Program anticipates a tiered framework for analyzing future site-specific projects, such that CDFA will prepare CEQA analyses for future site-specific projects. (Notice at 2.) On the other hand, the Notice makes clear that individual projects may be “covered” by the Statewide Program, and that if impacts are adequately addressed in the Pest PEIR, “no additional CEQA compliance would be necessary.” (*Ibid.*)

It is difficult to see how a programmatic EIR for the entire “range of plant pest prevention and management activities currently implemented by CDFA and its partners throughout the state” (Notice at 1) could accurately and comprehensively assess and disclose the site-specific impacts of pest management activities in all affected ecosystems and bioregions in California. However, if no further CEQA analyses will be completed for future projects, the Pest PEIR must inform the public of this fact and explain how specific activities will be implemented under the PEIR.

For example, CDFA must explain how the public will be informed of future proposed actions that are already “covered” by the Statewide Program Pest PEIR, and how and when their involvement and input will be allowed. What permits or approvals would be needed before site-specific actions can be taken? Is public involvement mandatory, or at the discretion of CDFA? Public and other stakeholder involvement is an important part of the CEQA process and is critical to environmentally considerate decision making. To the extent that the Pest PEIR will limit or eliminate public participation in site-specific pest prevention and management activities, or the public’s ability to challenge any such projects in court, the public should be informed and the consequences assessed in the Pest PEIR.

Additionally, if further CEQA analyses will not occur, the Pest PEIR must comprehensively analyze all of the environmental and public health impacts of the agency’s pest prevention and management activities, including all direct, indirect, and cumulative impacts, as well as alternatives that may reduce those impacts, *at the site-specific level*. Impacts that must be assessed and disclosed to the

public include impacts 1) to non-target insects, such as native moths and pollinators, 2) to vegetation and wildlife, especially threatened or endangered species, 3) to air and water quality (including an assessment of the potential for drift and runoff), and 4) to human health, especially vulnerable populations such as children, the elderly, and agricultural workers. The PEIR also must account for environmental variables, including geography, topography, climate, weather, and water and air quality.

II. Given the Broad Scope of the Statewide Program, CDFA Should Prepare a Programmatic EIR That Evaluates CDFA's Current Approach to Pest Management.

Because it would be extremely difficult, if not impossible, for CDFA to adequately assess all of the site-specific environmental effects of all current and future activities falling within the Statewide Program in all affected areas in California, it is important that CDFA focus the Pest PEIR on evaluating true programmatic issues that are relevant to all of CDFA's pest management activities. In this way, CDFA may comply with CEQA, as it must, "as early as feasible in the planning process to enable environmental considerations to influence project program and design . . ." (CEQA Guidelines, § 15004(b).)

Foremost, the PEIR should analyze the agency's current "quarantine, eradication and control" approach to managing non-native species, and whether there are other alternatives to this approach that would reduce and/or eliminate potential effects on the environment and public health. Aspects of CDFA's current approach to managing non-native species that must be clearly defined and considered in the Pest PEIR include:

1. the scientific bases for CDFA's management assumptions, such as the assumption that non-native plant pests can be completely eradicated;
2. the costs associated with CDFA's eradication and control programs both to the state and to growers;
3. a rigorous evaluation of the effectiveness of current practices in terms of actual control or eradication of pests as well as impacts on the growers whose products and livelihoods pest management programs are intended to protect;
4. the criteria (if any) CDFA uses to determine if non-native plant pests are a serious environmental risk and should be eradicated;
5. CDFA's current practice of declaring "emergencies" for pest eradication projects instead of following CEQA's procedures for preparing EIRs prior to taking action, how CDFA determines if a pest infestation represents a true emergency under CEQA, Public Res. Code § 21060.3 [defining "emergency" as a "sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, property, or essential public services"], and an analysis of how the Statewide

Program and Pest PEIR will change this practice and/or address infestations that by definition are unexpected;

6. the impact of global warming on the movement of and rate of arrival and spread of pests in California, and the implications for the impacts and effectiveness of CDFA's current/proposed programs as well as alternatives to the proposed program.

In addition, CDFA must analyze, at the appropriate scale, the direct, indirect, and cumulative impacts to public health and the environment, including the resources identified in the preceding section. The PEIR must incorporate a complete health and environmental analysis that considers the full formulas, including "inert" or "other" ingredients, of any pesticides employed, as well as chronic and subchronic exposures to those pesticides. CDFA also should consider the most recent research on the impacts of pesticides on public health and the environment from institutions such as UCSF's Program on Reproductive Health and the Environment. Decisions regarding pest management must give primary consideration to impacts to human health and the environment.

III. The Pest PEIR Must Analyze Less Toxic Alternatives to the Proposed Program.

CEQA requires that an EIR describe all reasonable alternatives to a proposed program, including those capable of reducing or eliminating adverse effects on public health and the environment. (Public Res. Code, §§ 21002, 21100.) The Notice states that the Pest PEIR will analyze the environmental impacts of "the management tactics authorized for use against a variety of plant pests." (Notice at 2.) It is important that CDFA structure the EIR so that it considers impacts of the proposed program of management activities and alternatives to that program, rather than addressing each potential management tactic as a separate program alternative.

Alternatives that should be considered in the Pest PEIR include:

1. An alternative based on true Integrated Pest Management (IPM), in which chemical control is an absolute last resort, least toxic chemicals are considered, and pest management is achieved by a variety of preventative practices, establishment of thresholds for pests, monitoring, and, if intervention is needed, with primary reliance on the manual and cultural approaches that organic and sustainable growers use;
2. An alternative that considers innovative methods of meeting national and international trade requirements other than chemical treatments, wide-area quarantines, and required treatment of growing areas. This alternative should explore diplomatic and other means for resolving concerns that establishment of non-native pest species in California could harm trade relationships with other states or countries, including removing or changing species' domestic legal classifications and establishing alternative forms of phytosanitary and grower-purchaser agreements that do not rely on chemical treatments on farms and in communities and other non-agricultural areas.

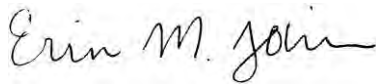
3. An alternative, or alternatives, that include(s) mitigation measures to protect 1) sensitive human populations, such as children, agricultural workers, and the elderly, 2) sensitive ecosystems and wildlife, including threatened and endangered species and aquatic habitats, 3) monitoring for impacts of program activities, and 4) independent scientific review of the risks posed by non-native pest species, and the health impacts of pesticides proposed for use in the programs.

Finally, in developing and considering program alternatives, CDFA should consider the most up-to-date scientific information. For example, entomologists at U.C. Davis are currently working to develop an Invasive Pest Policy that would be less dependent on widespread chemical intervention, more effective in preventing physical damage from pests and in satisfying economic and trade concerns, less burdensome to farmers, and more cost-effective than CDFA's current model. CDFA should carefully consider the work of these scientists, and any policy framework produced as part of the U.C. Davis process, to develop science-based alternatives to the Statewide Program.

CONCLUSION

Thank you for the opportunity to provide comments on the scope of the Pest PEIR. Please contact me if you would like to discuss any of the issues raised in this letter.

Sincerely,



Erin M. Tobin
Earthjustice

*Attorney for California Environmental Health Initiative,
MOMS Advocating Sustainability, and
Center for Environmental Health*

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: Peir Comments
Date: Monday, July 25, 2011 4:37:45 PM

From: Sandy Ross [\[mailto:healthhab@igc.org\]](mailto:healthhab@igc.org)
Sent: Mon 7/25/2011 4:21 PM
To: Pest PreventionEIR
Subject: Peir Comments

Health & Habitat, Inc.
76 Lee Street, Mill Valley, CA, 94941, 415-383-6130

Via Electronic Mail
July 25, 2011

Attention: Michele Dias, Acting Chief Counsel California Department of Food and Agriculture 1220 N Street, Suite 400 Sacramento, CA 95814 [PEIR.info@cdfa.ca.gov](#)

This document is a great disappointment – but what we have come to expect from agencies that have become more and more allied with the chemical companies. Workers are afraid to speak out against this toxic tide, for fear of losing job and pension. These companies line legislator's pockets and persuade actions that ensure big pesticide sales. At the same time, big pharma has “bought” the medical schools – so our health professionals do not protect their patients from chemicals and pesticides.

But here in California we have a chance to do it right – if CDFA has the integrity to do it. For example, excuses abound about relationships with other countries and trade “balances”. So, lets turn the whole thing upside down – clear the deck – scrap the old, mostly false mantras. Which convoluted regulations are to protect farmers in various countries – and which are to prevent spread of pests?

Really embrace UC Davis's emerging Invasive Plant Policy which is less burdensome to farmers and more effective in actually preventing real insect damage, rather than spraying for imagined damage.

CDFA PEIR Comments

1. Prove that you can accurately anticipate future “invasive pests” and ways to reduce their impact on CA food.
2. Prove that it is not better to work on having food growers plant crops that are best suited to their climate – rather than trying to grow a species that requires chemicals to make it viable. Why should Californians suffer pesticides in the air and on their food just because someone decides to grow strawberries or cherimoyas out of their “native” territory and climate?
3. Why are you planning to spend such a huge amount of money, when for 1/10 (or 1/20 if you run over budget), UC Davis is fast tracking a good plan – 21st Century Invasive Pest Policy, c/o Professors Carey & Zalom.
4. Explain why you are not using the Carey plan from UC Davis.
5. How does CDFA plan to rise above the industry wide layers of pesticide prevarication and payoffs?
6. Heretofore CDFA has put out a lot of platitudes and obfuscations about its past, present, and future plans for handling pests. Do you plan to be forthright, and how will you do this?
7. In the past, one of the tricks CDFA used to get money was to declare an emergency and get Federal funds. If you are reducing incidence of “emergencies” under the PEIR, how will you get the federal dollars you depend on?
8. What happened to the 100 people you hired in an LBAM “department”? Do you plan to keep them on? How will you pay them, and under what guise?
9. Who defines what a pest is? Too often we go about killing things we do not know enough about, without considering the web of life. WE are all aliens – should we be eradicated or sprayed with poisons?
10. So what are these regulations you plan to promulgate?
11. If a person has letter from a health professional saying that chemical pesticides will harm them. Will you avoid getting chemicals on them and their property, be it from hand, truck, or aerial delivery – and how will you do this.
12. What about people with chemical sensitivities who are legally

disabled? What will you do to protect them??

13. How do you plan to protect the 17% of the State's population which state survey shows to be chemically sensitive? Will you notify them, move them, and compensate them for their property no longer useful to them when contaminated with pesticides?

14. What do you mean by "minimize impacts..to human health? You set things up so there is someone who will say its "OK". Well, pesticides KILL, so no matter what you do, you will be killing plants, pets, and people – some more rapidly than others.

15. The so-called State health people who investigated the LBAM complaints were just as cavalier as CDFA, spouting pesticide company propaganda and criminally neglecting a population of people the State made sick.

16. A safe food supply – is NOT one covered in CDFA applied pesticides.

17. Your NPDES permit is in a shambles – as it appears agencies like mosquito districts will not have to abide by it.

18. Your protestations that you are doing 5 times the required public explanatory is a sham – as there will be NO chance to challenge future activities. All this blather about public participation is a sham.

19. And what's this about "Authorization of existing CDFA.. programs"??! Are you trying to get the LBAM program grandfathered in?? That is a total SHAM – misuse of people's money. The moth has not harmed anyone or caused financial loss of crops – except where you prevented people from selling their produce.

20. In your notice of preparation you list potential environmental issues to address – PLEASE ADD: PEOPLE, PETS, & PLANTS as these will be the most effected. What about native vegetation?

21. CDFA's whole LBAM program was shameful – and this PEIR appears to cast the same process in cement. Once an insect population has reached the point that it shows up, it has already become established. Best place to catch them is in shipments coming into the country. We need to really think if we need to have tropical fruits off-season - or for that mater, biscuits from Scotland. We should live within our means and local capabilities.

22. And what's wrong with a worm in an apple? Shows it wasn't

sprayed with poison.

23. Bottom line – this PEIR is just a Carte Blanche for CDFA to do whatever it wants, whenever it wants – regardless of the poisons it will be dumping on people, pets, and plants. Your scoping memo says it all: “.. no additional CEQA compliance would be necessary”.. !!!!!!!!!!!!!!!

24. It is not acceptable to do a PEIR that takes away MY rights to stop or affect state actions that would have a direct impact on my health, that of my family and friends, and the health of the thousand of people who do not know to protest this diabolical action.

25. Your primary goal should be to have NO impact on human health – instead of figuring our ways to spray us when we cannot protest.

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: Scoping: Program Environmental Impact Report for Pest Management
Date: Tuesday, July 26, 2011 11:23:07 AM

From: Frances D. Hinckley [\[mailto:francesbiz@yahoo.com\]](mailto:francesbiz@yahoo.com)
Sent: Mon 7/25/2011 9:06 PM
To: Pest PreventionEIR
Subject: Program Environmental Impact Report for Pest Management

The California Department of Food and Agriculture, CDFA, is requesting a Program Environmental Impact Report (P-EIR) for pest management.

There are a continually increasing number and type of pesticides and related chemicals being created, all the time. These chemicals are not adequately analyzed for the array of applications in which they are often used. I think it pretty much impossible to adequately analyze them all of the kind of blanket approval for which the CDFA seeks.

Approval of this PEIR would broaden CDFA powers and amounts to giving blanket permission to CDFA's "best judgment" and removes the need for situational EIRs, which allow for a relatively transparent process, allow for public input and are required by law.

I would say that the CDFA has recently shown a LACK of capability in passing even "good enough" judgment when it comes to all of the following:

- identifying what constitutes an actionable pest,
- use the best possible, 'robust' science,
- what damage a given pest may present,
- what type of response to mount, what is an appropriate level of response,
- apply the response within the designated treatment area only and at a consistent, accurately measured, appropriate dosage,
- choose a proven, safe treatment, that complies with best integrated pest management practices (IPM) and the best available rigorous science,
- how often such a response needs to be administered,
- when such responses are administered (timing),
- what chemicals (or other treatments) that are appropriate to use,
- apply treatments within appropriate designated boundaries only,
- choose treatments that are safe for all that might come in contact with

them, especially those most vulnerable populations, like children, in addition to our shared environment,

- whether such damage outweighs the probably result of the proposed response,
- what an "emergency" is
- be truthful about what exact treatments they are actually administering.

* Since 2007, the CDFA has maintained that the Light Brown Apple Moth (LBAM) was such a huge threat to California's agriculture as to require a state of emergency that allowed them to administer multiple areal spays of urban areas in Monterey and Santa Cruz Counties. This state of emergency was conducted for a moth, LBAM, that has approximately fifty same family moths already in the state, is not quarantined by Europe, nor other countries and about which the National Academy of Sciences' chair, May Berenbaum, raised grave concerns about its designation, saying that the "APHIS response would greatly benefit from the use of more robust science to support its position." It is now four years later, and, by CDFA's won admission, no damage has been caused by the LBAM, in spite of the fact that their pesticide plans were stopped.

These facts cast grave doubt on CDFA's ability to accurately identify a pest based on "robust science" and what kind of damage it may actually cause.

* For LBAM (the pest of questionable designation), CDFA did administer aerial pesticide spray. The action plan called for multiple areal sprays, over areas that included urban centers, once a month for 3 to an undetermined number of years. Aerial sprays are notoriously inaccurate in staying inside any kind of designated area and are prone to drift, being subject to any type of air movement and turbulence caused by any kind of variation (hills, trees, buildings, etc) in topography and. How can that administration plan be justified, when it is such an uncontrolled and uneven application? It would inevitably lead to over application in some areas and underapplication in others. It also makes it impossible to avoid application to our surface water, probably the single most valuable resource that the state of California has! Because of the questionable 'state of emergency' called by the state, I am not even sure how was determined that "eradication" was the goal, rather than containment? Numerous entomologists are on record in public hearings stating that 'eradication' was not even a possibility.

It really seems like a case of extreme over response, with inappropriate delivery system, that guaranteed an inconsistent distribution and application of the chosen chemical response, all for a moth that was a questionable threat, at most.

* Integrated Pest Management systems are the approach used by enlightened, advanced, integrated communities. Over response is not part of a sound IPM program. An IPM tries to use the least toxic solution to the problem, choosing pesticides as a last resort; IPMs are the choice of the evolved society. CDFA seemed to have used the reverse philosophy for the LBAM. The chemicals they choose to spray ('checkmate') was untested against the moth, but known to be harmful to humans. The spray was to be monthly, but the time release was supposed to take 30-90 days, meaning a continual threefold cover rate after the third month. The long release would multiply the issue of drift.

This seems a case of a poorly applied and over applied chemical that was not in any way in line with IPM practices.

* After much public outcry it was disclosed that the ingredients of checkmate, include Type 3 carcinagens. How can this be thought of as an appropriate to spray over anything: people, animals, our water supplies or any part of the environment? This was to be spray over heavily populated urban areas, over school yards and hospitals. It seemed that spraying after 8PM was supposed to be a good time? As I write this it is after 8 PM on a mild summer evening and I am at the library, from which I will walk home. I can smell bar-b-qs going and hear families outside enjoying the evening. I do not consider any time before 2AM to adequately reduce the number of people outdoors. On top of that buildings are required to have fresh air ventilation, which means being inside really makes inadequate difference. And I certainly do not approve of any type of application of a Type 3 carcinogen anywhere near our water supplies, our schools, playgrounds, hospitals, day and eldercare facilities or anywhere else that might house anyone with any sort of extra physical vulnerability. Mind you, we are all, regardless of how healthy, subject to damage from Type 3 carcinogens.

This was a bad administration of a toxic chemical that in no way protected vulnerable portions of the population, nor of our water supplies nor our environment.

*The CDFA is charged with protecting "food and agriculture" within the larger context of the people and the environment. In this case I found them to only give consideration to agribusiness and not to small farmers, organic farmers, "we, the people," our health, the cost to the state of an unhealthy population (having been systematically exposed to Type 3 carcinogens, as proposed), our water supply, our livestock, domestic and wild animals, our tourism, our ecosystem, our air, and I could go on! The response they did mount cost small farmers and Organic farmers money. If the spray had continued, CA produce would have been looked on as being questionable, because, why would one choose food sprayed with known carcinogens? Europe certainly would not want to buy it. I wouldn't want to buy it. (I would have moved out of state.) The USDA Organic label would have been called into question for allowing the proposed waiver for 'checkmate' on otherwise organic produces. I would have expected a major drop in tourism, for why would tourists want to come to California to be sprayed? What about our poor pollinators, on whom our crops depend and who are already having such a hard time of it with colony collapse syndrome? They are definitely susceptible to such an intensive and continuous, pesticide application. We would lose most of our crops without pollinators and why would any out of state pollinator supplier want to bring his/her bees anywhere near CA?

I think the CDFA's response to LBAM is a classic example of only being able to see one's own point of view and not being able to see the bigger picture and appropriately weigh all the factors.

* The CDFA appears to have a different definition of an "emergency" from that of a reasonable person when referring to a tiny light brown apple moth. CDFA Secretary Kawamura declared, "This emergency (LBAM) clearly poses such an immediate, serious harm that delaying action by providing five working days advance notice to allow public comment would be inconsistent with the public interest. This emergency action is to avoid serious harm to the public peace, health, safety or general welfare."

Harm? As an architect, I am bound to "protect the public health, safety and

welfare." I do not think that poisoning our environment, homes, air, etc is in any way protecting the people or the environment. Nor is it protecting the small and/or Organic farmers, who were hurt by the LBAM quarantines. CDFA has a strange sense of emergency and of protecting. Protecting who? Maybe the people who sell the pesticides?

* It is sad to say that the CDFA was not completely truthful in their representation of the chemicals they sprayed and intended to continue to spray for the LBAM. At first they described what they were spraying as harmless, pheromones, natural and the like. After intense pressure they admitted that they were spraying a pesticide, "checkmate" but would not release the ingredients. Ultimately it came to light that the ingredients contained chemicals classified as Type 3 carcinogens. They proved themselves to not be transparent, nor truthful.

It is also questionable if a P-IER is even legal. To me it violates by right to "life, liberty and the pursuit of happiness." Administration of pesticides to me and my children damages our health, thus limiting our life and inhibiting our pursuit of happiness. To me it is also a violation of my liberty and property rights to spray is on our own private property, at our schools and school yards, etc.

One might say 'stay inside during the sprays. The proposed response to the LBAM called for monthly areal spray with a timed release that would deliver for 30-90 days, making no time when it would be possible to go outside without being exposed. Furthermore, I can tell you as a CA Architect that building are designed to have continual air changes, expelling inside air and replacing it with outside air. Being inside would offer absolutely no protection from an aerial spray.

Furthermore, back to the legal question I would say:

1) United States Constitution "...No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws." [Article XIV](#)

2) California State Constitution - The very document that creates the state of California, Guarantees safety for its residents: "All people are by nature free and independent and have inalienable rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety, happiness, and privacy." [Article 1](#)

[DECLARATION OF RIGHTS - Section 1](#)

3) "The people have the right of access to information concerning the conduct of the people's business, and, therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to public scrutiny." CA Constitution, [Article, 1, Section 3\(b\)\(1\)](#)

4) California Code requires consent before spray: "No person shall directly discharge onto a property without consent of the owner or operator of the property." [California Code, Division 6, Chapter 3, subchapter 2, Section 6616](#)

5) California Code requires protection of persons, animals and property b) Notwithstanding that substantial drift would be prevented, no pesticide application shall be made or continued when: 1. There is a reasonable possibility of contamination of the bodies or clothing of persons not involved in the application process; 2. There is a reasonable possibility of damage to nontarget crops, animals or other public or private property; or 3. There is a reasonable possibility of contamination of nontarget public or private property, including the creation of a health hazard, preventing normal use of that property. [California Code, Division 6, Chapter 3, subchapter 2, Section 6614](#)

6) [CEQA](#) - California Environmental Quality Act Protection of the environment consistent with the provision of a decent home and suitable living environment for every Californian shall be the guiding criterion in public decisions.

CA. [Public Resources Code, Div 13](#), Environment. This section states that it is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man. It further states that governmental agencies at all levels are required to consider qualitative factors, as well as economic and technical factors, and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

7) Further, [Title 14, California Code of Regulations](#), Chapter 3. Guidelines

for Implementation of the California Environmental Quality Act, Article [18. Statutory Exemptions](#), Section [15269](#). Emergency Projects. "The following emergency projects are exempt from the requirements of CEQA: Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term." An emergency is defined as: "A sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to life, property, or essential public services. "Emergency" includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage" The Legislature had a chance to exempt CDFA from CEQA and purposefully chose not to do so. The legislature desired full CEQA review of projects undertaken to eradicate LBAM.

8) [Thematic Strategy on the Sustainable Use of Pesticides Expert Meeting on Aerial Spraying](#) Minutes of the Meeting, March 31, 2004, European Commission*, wherein the Commission states that, due to inherent high risk (in particular from spray drift), aerial spraying should be banned...and would require member states to severely restrict or ban aerial spraying when the conditions for safeguarding bystanders or the environment cannot be fulfilled [and this statement was made in consideration of aerially spraying crops, not human populations] [The Precautionary Principle](#) is the guiding hand in the European Union's response to pesticides and genetically modified foods and animals, and is a reason U.S. agricultural products are rejected in these countries. The European Union Commission Communication notes "The Precautionary Principle applies where scientific evidence is insufficient, inconclusive or uncertain and preliminary scientific evaluation indicates that there are reasonable grounds for concern that the potentially dangerous effects on the environment, human, animal or plant health, may be inconsistent with the high level of protection chosen by the EU."

9) CDFA has not yet obtained clearance to begin spraying from the US Fish and Wildlife Service as it relates to the impact of spraying on endangered species. APHIS has designated CDFA to find out if endangered species would be affected, also to see if minority populations and [EXECUTIVE ORDER 13045](#) , Protection of children from environmental risks is violated.

NOT A THIRD PARTY, INDEPENDENT, UNBIASED AGENCY, APHIS and CDFA and EPA and USDA are all committed to this assault on citizens to further limit competition of interstate and foreign commerce, all components defined as violations under the RICO Act.

10) CDFA's actions act as a nuisance and a trespass ([County of Santa Cruz vs CDFA Superior Ct. of California. County of Santa Cruz Case No. 158516](#), Oct. 31, 2007) Officials would uphold laws to forcefully blunt citizen nuisance and trespass on their homes and their properties. There would be no equal application of enforcement.

11) CDFA has yet to provide the public with evidence of a permit from the Monterey Bay Marine Sanctuary. Undersecretary Gomes states that "The Department will not apply pesticides to water bodies, riparian habitat areas or areas lacking host insects."

12) CDFA refuses to answer questions from citizen interest groups and legislators in compliance with CPRA and FOIA in a timely and complete manner, if at all.

13) [Section 18](#) of the Federal Insecticide, Fungicide, and Rodenticide ACT ([FIFRA](#)), [EPA regulation 40 CFR Part 166](#) (ref. 10) has not approved pheromone products for chronic or repeated use or for aerial spraying or in any preparation, micronized or aerially delivered, even in times of true emergencies...

14) The [Americans with Disabilities Act](#) protects people with chemical sensitivities and other disabilities from discrimination. From: <http://www.healthcentral.com/asthma/index-3259-149.html> The Americans with Disabilities Act (ADA) is a civil rights law that gives you the right to ask for changes where policies, practices or conditions exclude or disadvantage you. As of January 26, 1992, public entities and public accommodations must ensure that individuals with disabilities have full access to and equal enjoyment of all facilities, programs, goods and services. The ADA borrows from [Section 504](#) of the Rehabilitation Act of 1973. Section 504 Prohibits discrimination on the basis of disability in employment and education in agencies, programs and services that receive federal money. The ADA extends many of the rights and duties of [Section 504](#) to public accommodations such as restaurants, hotels, theaters, stores, doctors' offices, museums, private schools and child care programs. They must be readily accessible to and usable by individuals with disabilities. No one can be excluded or denied services just because he/she is disabled or based on

ignorance, attitudes or stereotypes.

Does the ADA Apply to People with Asthma and Allergies?

Yes. In both the ADA and Section 504, a person with a disability is described as someone who has a physical or mental impairment that substantially limits one or more major life activities, or is regarded as having such impairments. Breathing, eating, working and going to school are "major life activities." Asthma and allergies are still considered disabilities under the ADA, even if symptoms are controlled by medication. ... Under Section 504, public schools and programs cannot avoid their responsibility by claiming to have limited funds or resources. Nor can they impose a "disparate impact" on people with disabilities. The ADA requires public accommodations to make changes, except in cases where an "undue burden" would result. This program violates the intent of the Light Brown Apple Moth Act (2)(C) (senate bill 556) which states, "Eradication activities undertaken pursuant to this article shall comply with all applicable laws and regulations and shall be conducted in an environmentally responsible manner."

If the CDFA had been operating in a truly "environmentally responsible manner," they would have allowed the necessary environmental impact reports to supersede their aerial pesticide spraying program. Instead, the State used its powers to push through a totally unproven, unsubstantiated false "emergency" in order to intentionally evade all environmental impact reports and spray residential areas with an untested pesticide applied in an unconventional way. It seems that these actions made hundreds of people sick, while causing damage to the environment, like the deaths of hundreds of birds from an undocumented "mystery oil" spill, and the worst "red tide" in the history of California, which made many surfers sick.

At best the CDFA's recent track record is questionable enough to warrant no increase in their authority. At worst CDFA's lack of judgment is criminal. I do not think CDFA can, alone, consistently choose the safest, most scientifically sound, tested, proven course of action in every instance. I do not think there are any grounds for expanding their authority and limit the public's right to know what they are doing and eliminate the public's opportunity to provide feedback, input and insight through the existing, and at times cumbersome and bureaucratic, individual EIR process. I do not

believe that CDFA has shown itself worthy of approval of the PEIR, nor do I think it would be a good idea, even if CDFA had a perfect track record.

Please do NOT authorize a PEIR to CDFA. Please require that the CDFA continue to be required to continue to follow our imperfect, but better, system.

Thank you,
Frances Hinckley

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR Comments: Proposed PEIR Re: "pest" management
Date: Monday, July 25, 2011 11:57:04 AM

From: cherielj [\[mailto:cherielj@earthlink.net\]](mailto:cherielj@earthlink.net)
Sent: Mon 7/25/2011 11:33 AM
To: Pest PreventionEIR
Subject: Comments of Cheriel Jensen on Proposed PEIR Re: 'pest' management

Cheriel Jensen
13737 Quito Road, Saratoga California 95070

July 25, 2011

Michele Dias

California Department of Food and Agriculture

1220 N Street, Suite 400

Sacramento, CA 95814

via:

PEIR.info@cdfa.ca.gov

Comments on the Notice of Preparation for the PEIR for the Statewide Pest Prevention and Mangement Program:

The California Environmental Quality Act provides the guidance for the preparation of an EIR for all public and private projects having an impact on the environment.

The federal Environmental Policy Act provides for the guidance for the preparation of an Environmental Impact Statement (EIS) for projects using federal money.

An EIR and an EIS are intended to find, identify and describe the relevant facts in such a way as to document potential impacts of potential actions or projects, and disclose these facts for the decision makers and the public before a decision or action takes place so that impacts are actually recognized, minimized in the project design, and significant impacts are avoided. The EIS and the EIR are somewhat different in their scope and disclosure requirements.

The concept of being able to address the environmental impacts of pest prevention and management in a single PEIR across the entire state, and for the variety of pests, many of which are currently unknown, all with their individual aspects, is laughable if it weren't so

potentially ignorant and deadly in its design.

It appears this effort is simply an attempt to avoid the timelines of the EIR/EIS when the Department of Food and Agriculture wants to take an action. But there is a reason for the timelines and the process. The EIR process provides an opportunity for each center of expertise, official and from the public, to be notified and to have time to examine the project and provide their expertise to the body of knowledge to better predict impacts and to thus result in a more thoughtful project with less impact.

The idea that a PEIR will be able to cover the essential aspects of any of the potential pests, let alone all the potential pests and existing environments boggles the mind. We are talking about the contents of a huge library and a forest felled for publication.

The existing environment must be described in the PEIR. California consists of thousands of microclimates, intricate landscapes, local flora and fauna communities, live soil/rock/sand complexes and water/fog/ice scapes. Can the single EIR document each of these throughout the state? Can a single PEIR document the effects on each of these communities by each projected 'pest' and for each 'pest' a range of 'solutions'?

Hormone influencing chemicals and pesticides each have specific mechanisms of action. Can the PEIR document each of these mechanisms, the flora and fauna to be injured or otherwise affected by all the possible chemicals that may be used? For example, Pyrethrums and Pyrethins and many other pesticides kill bees including our most important pollinator, the non-native honeybee? Does the PEIR plan to inventory the various types of bees across the state and propose an acceptable level of bee killing?

What other parts of the California environment are non-native but have become essential within the native plant and animal communities? Steelhead comes to mind. The role of the Eucalyptus in the life of the Monarch butterfly comes to mind. Would anyone attempt to convert the Italian Ryegrass back to the native bunch grasses? Would we attempt to reintroduce the grizzly bear to the San Francisco Bay Area? So will the PEIR address the benefits, necessity for adaptation and evolution of the landscape as well as the native environment?

Does the PEIR assume all non-natives are equally unwelcome? How will that assumption be evaluated? Say-so is not sufficient for an PEIR.

How does a PEIR evaluate the short term and long term impact of individual pests, including pests not known to be present now, and on which landscapes? For example, the Light Brown Apple Moth (LBAM) was trapped at high levels in Monterey and Santa Cruz counties before, during and increasing just after the overhead spraying by CDFA. After actions had been stopped two years, the trapped numbers plummeted. Would a PEIR have predicted the natural environment to have minimized this CDFA defined 'pest' all by itself? Not learning from these numbers, CDFA continues to meddle in the natural environmental processes minimizing the LBAM. What would a PEIR have predicted?

Third, most chemical formulas contain so called 'inerts,' sometimes as much in the formula

as 95%. How is it possible for a PEIR or EIS to address the environmental impact of chemicals that are not and will not be disclosed?

While some documentation on some of the environmental effects of some of the named chemicals is published, much less documentation exists on brand-named chemical combinations. How is it possible for the PEIR to address combinations of chemicals of individual brands where the research is sparse or non-existent?

Addressing long term impacts is required by CEQA. While some information is available for individual chemicals for short-term effects, information on long term effects for most potential chemicals is far more sparse and almost non-existent for brand named chemical combinations. For example it took 40 or more years for the information on brown pelican egg thinning, and thus their near demise, to come to light as an effect of DDT. It took almost 70 or more years to find out the degradation product of DDT, DDE is found in almost all cancerous breast tissue.

Will the PEIR disclose human impacts for all the potential chemicals, unnamed chemicals and chemical combinations?

Will the PEIR disclose the manufacturer's studies kept secret? How is this to be accomplished?

Will the EIR disclose and make use of the body of research by individuals and institutions not connected to chemical manufacturers? For example, our testing has shown that even small exposure to Roundup in the air increases the flammability of trees by a factor of 5 to 10 even though the trees appear to be the same as non-exposed trees. But how are we as a public to contribute to this PEIR when there are hundreds of potential chemicals to be addressed and thousands of such facts.

Will the PEIR address people with the whole host of specific conditions? For example, will it disclose how the various chemicals that may be used will impact people with liver damage?

Will the PEIR disclose how each of the various chemicals will impact people with kidney damage, MS, post polio syndrome, shingles, hyperactivity, insomnia, chemical allergy, thyroid deficiency, cancer, deficiencies of p45, p450, etc?

Will medical experts in toxicology, who have actually treated people who have been poisoned with pesticides, be enlisted to describe the impact of each of the potential pesticides in the medical parts of the PEIR? Will there be a medical part of the PEIR? People are a part of the environment.

Will the PEIR address pregnant women and how the various chemicals that may be used, in their various potential dosages, will impact the baby being created and the process of pregnancy? For example, after the Malathion applications went on over the southern San Francisco Bay Area two years, it was found in a Kaiser Hospital study that higher numbers of infants were born with deformed intestinal tracts.

Will the PEIR address the impact on humans, flora and fauna, and soil complexes of chemicals that are not disclosed? How is this to be done?

Will the PEIR address the climate impacts of the use of each of the solvents and pesticides and the other chemical formulas?

As can be seen here, the task of a sufficient PEIR for such a 'program' is not really possible. Individual EIRs/EISs addressing individual 'pests' is the only way such environmental issues can reasonably and honestly be addressed, as the task for a PEIR would amount to a library of documents and participation of scientists, the numbers of which, do not now exist.

If this PEIR goes forward, I expect all of the above issues to be sufficiently addressed to inform decision making.

Yours truly,

Cheriel Jensen

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR COMMENTS
Date: Monday, July 25, 2011 5:42:44 PM

From: Eleanor Lyman [<mailto:eleanor@eleanorlyman.com>]
Sent: Mon 7/25/2011 5:18 PM
To: Pest PreventionEIR
Subject: PEIR COMMENTS

My name is Eleanor Lyman

I would like to share the following questions and concerns regarding the Notice of Preparation and the scope of the proposed Statewide Plant Pest Prevention Programmatic Environmental Impact Report.

- 1) It is not acceptable to propose a scope for this PEIR that would take away the public's right to stop or affect state actions. The public has a right to be involved in actions that directly effect their health and the health of the environment.
- 2) The PEIR should include specific plans for achieving the objective of minimizing or eliminating impacts on human health and the environment by pest management's use of toxic chemicals.
- 3) This PEIR should include modernizing and updating the state's approach to pests, to take advantage of the new scientific research and technology from our state universities to eliminate the use of toxic chemicals and quarantines.
- 4) The NOP statements, such as that pests often spread rapidly and can be eradicated if rapid action is taken, is questionable. According to the records there is a lack of success of this approach, the treatments go on indefinitely. It is time to update and change the approach taken by the CDFA.

Thank you.
Eleanor Lyman
49 Wharf Road
Bollinas, California 94924

From: [Michele Dias](#)
To: [Michael Stevenson](#);
Subject: PEIR Scoping comment
Date: Monday, July 25, 2011 8:36:58 AM

From: lauren schiffman [\[mailto:crackmagazine@hotmail.com\]](mailto:crackmagazine@hotmail.com)
Sent: Mon 7/25/2011 12:02 AM
To: Pest PreventionEIR
Subject: PEIR

To Whom It May Concern,

I live in Richmond, California, and I would like to share the following questions and concerns regarding the Notice of Preparation and the scope of the proposed Statewide Plant Pest Prevention Programmatic Environmental Impact Report:

1) It is not clear in the Notice of Preparation what steps CDFA would take before carrying out, for example, wide-area pesticide spraying such as was done for the light brown apple moth in 2007.

When and how will I, and other members of the public, have a meaningful voice and ability to influence CDFA's future pest management activities, which could involve spraying my community or my food with pesticides?

It is not acceptable to propose a scope for this PEIR that would take away my right to stop or affect state actions that would have a direct impact on my health and the health of my family.

2) The NOP mentions human health only as one of several program objectives. The primary goal for this EIR should be to find alternative ways to manage pests so as to eliminate adverse human and environmental health impacts created by pest management activities.

3) The "Program Components" outlined in the NOP should describe CDFA's plans to develop a system for evaluating human and environmental health impacts from the treatments considered in the Statewide Program, and ways to minimize or eliminate those impacts. It is not enough to simply state in the NOP that a program

objective is to minimize impacts to human health and the environment. The PEIR should include the specific plans for achieving that objective in the program.

4) The NOP relies on the same outdated assumptions and approach to pests that CDFA has been using for decades: quarantine, and eradication or containment. This approach does not work as we have seen with the repeated quarantine and eradication projects for the same pests year after year. The NOP makes inaccurate statements, such as that pests often spread rapidly and can be eradicated if rapid action is taken although we know based on prior experience that in general pests do not spread rapidly and that eradication has seldom if ever succeeded.

Why does the PEIR rely on CDFA's past practices when new science from our own state universities is available to update the current approach so that it is more effective, less toxic and far less burdensome to our farmers? Where are the provisions in this PEIR for modernizing and updating the state's approach to pests, to take advantage of this new scientific research and technology and to eliminate the use of toxic chemicals and quarantines that can be devastating to farmers?

Thank you for taking my concerns into consideration.

Best,

Lauren Schiffman
1343 S. 59th Street
Richmond, CA 94804



California Department of Food and Agriculture
Attn: Michele Dias, Acting Chief Counsel
1220 N Street, Suit 400
Sacramento, CA 95814
PEIR.info@cdfa.ca.gov

July 25, 2011

Dear Ms. Dias:

Sierra Club California welcomes this opportunity to share our views regarding the Programmatic Environmental Impact Report (PEIR) on CDFA's Statewide Plant Pest and Management Program. While recognizing the damage that invasive species may cause to California's agriculture and environment, we believe that the efforts to defend against these organisms must cause the "least possible hazard to people, property, and the environment" (www.epa.gov/opp00001/factsheets/ipm.htm).

Although a number of the PEIR objectives as detailed in the Notice of Preparation (NOP) offer certain benefits, the area of investigation is extremely complex, and both the value of the PEIR and its legal justification under the California Environmental Quality Act (CEQA) will depend on its being conducted in great detail and at a very high level of rigor.

Specifically, the Sierra Club Ca recommends that the PEIR include a comprehensive discussion of the following subjects:

- Ecological variation. Besides being structured around treatment methods and pest categories, if the PEIR is to be truly comprehensive it has to take ecological categories into account. Control methods differ in both efficacy and consequences depending on location: the desert is not the same as the coastline, urban areas must be treated differently from farmland. We recommend that a detailed list of ecological categories be devised, and that control choices be systematically evaluated relative to each category throughout the PEIR.

- Non-target organisms. Ideally, all pest control mechanisms would impact their intended target and no others, but in the real world such a high level of specificity is rarely obtainable. Therefore environmental analysis of each pest, each control method and each delivery system must examine possible effects on non-target organisms. Such effects are obvious in the case of broad-spectrum pesticides (and provide one reason why such chemicals should be regarded as an instrument of last resort), but even comparatively low-impact techniques such as the use of pheromones for mating disruption can sometimes affect closely related but non-target species. Furthermore the elimination of invasive species can on occasion lead to broader environmental consequences that are not always benign: for example, removal of invasive riparian tamarisk can result in streambank degradation and loss of wildlife habitat. To minimize unintended negative consequences, it's necessary first to identify the potential for occurrence of such negative consequences, and second to provide compensatory mitigation—in the case of the example above, erosion control structures and a revegetation program with appropriate native species.
- Special status species. A clear and effective process is needed for appropriate ways of dealing with any rare or endangered species that might be affected by control programs, not only by being inadvertently targeted, but also if the program results in the loss of habitat or prey animals. Since these impacts would ordinarily be highly site-specific, it seems impossible for the PEIR to cover them all to the degree of specificity required, but a general procedure for identifying special status species and mitigating any deleterious consequences should be provided in detail.
- Designated Wilderness areas. Invasive species' potential to damage wildlands comes with no exemptions for designated federal Wilderness, but control programs in Wilderness face constraints particular to the designation, most usually in the form of forbidden application methods. The PEIR would provide a significant benefit by delineating protocols that permit effective control methods to be implemented without violating the special character of these very special lands.
- Riparian areas. Aquatic Invasive Species (AIS) pose a severe and growing threat to the environment in California, and because of their capacity to adversely impact irrigation systems they threaten agriculture as well. Comprehensive evaluation of AIS control methods in this PEIR will facilitate effective management. On the other hand, some chemicals (both active and "inert") that can be used with comparatively little risk in terrestrial environments may pose serious hazards if applied to bodies of water, either directly or as a result of drift or runoff. The PEIR should routinely evaluate each treatment method in relation to the riparian environment, i.e., an analysis that includes the method of application as well as the chemical treatment itself.

- Integrated Pest Management. As defined by the University of California, “Integrated pest management (IPM) is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and nontarget organisms, and the environment” We recommend that the PEIR be explicitly structured around IPM strategies, and that all management decisions be based upon them.
- Aerial spraying. Although this delivery method sometimes provides the only reasonable means of controlling invasive species that have infested large segments of crop lands or wild lands, it is inherently likely to affect non-target areas and non-target species, and to have unintended impacts on human beings. For that reason we recommend that aerial spraying be systematically regarded as a method of last resort, and that it never be employed in populated areas except in those rare circumstances when no reasonable alternative exists, and when failing to spray would result in demonstrably dire consequences to human health or the environment. In addition, all reasonable precautions must be taken to control the effects of such spraying on non-target organisms, human health and the environment and the least poisonous & least environmentally damaging chemical and means of application must be used.
- Prevention. The PEIR proposes to evaluate a broad range of management methods that can be used to control or eradicate invasive species that enter California, with the objective of permitting rapid response and thus “preventing” their spread, but genuine prevention also includes strategies that keep pests from entering the state at all. Such strategies can offer significant benefits, not only in avoiding damage from invasive organisms, but also in avoiding the risks and costs associated with treatment methods. A detailed analysis of prevention methods -- for example, increased surveillance at border stations or establishment of effective protocols for the treatment of imported firewood -- would be a valuable addition to the PEIR.
- Persistent Organic Pollutants. Avoidance of Persistent Organic Pollutants should be a priority. Any evaluation of this category of chemicals in the PEIR should include a review of the science leading to the Stockholm Convention banning their use, and the current or residual effects of these dangerous substances should be included in any review of synergistic long-term impacts as mentioned elsewhere in these comments.

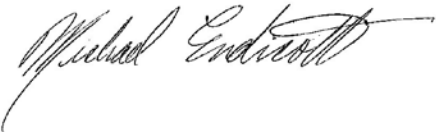
- Cumulative impacts. The PEIR will undoubtedly evaluate the effects of a wide variety of individual chemicals on target organisms, the environment, and human health. It is also necessary to consider cumulative impacts from repeated exposure, and to exposure to more than one substance. From an environmental perspective, natural areas in close proximity to agricultural areas need very close scrutiny; from a human health perspective, the need is particularly stringent in the case of farm workers. The document should also analyze the synergistic effects of these chemicals on human health and the environment.
- Sensitive receptors. The effects of pest control treatments vary from one individual to another and therefore cannot be predicted with full certainty, but certain categories of people such as children, pregnant women, the elderly, and those with compromised immune systems are commonly found to be at greater risk. Evaluations of “safe” levels of exposure to toxic substances cannot wholly rely on average responses found in the general population, but must take these special categories into consideration, and wherever possible provide mechanisms to avoid putting the vulnerable in harms way. Practices such as refraining from pesticide applications at schools, hospitals, and playgrounds provide an example of such mechanisms.
- Inert ingredients. Chemical pest control formulations consist of “active” ingredients affecting the target organism, and “inert” substances that by definition do not directly harm the pest in question. Such “inert” substances are not necessarily chemically non-reactive, nor are their impacts on other organisms (including human beings) always insignificant. To be complete, analysis of any given chemical product must include inert ingredients such as surfactants, propellants, and attractants.
- Tiering criteria. We recognize that CDFA hopes to be able to implement future control programs without the necessity for undertaking further project-level EIRs when a new invasive species is discovered. Whether or not this objective will prove feasible in any specific instances, additional environmental review tiered upon the PEIR will always be necessary, if only to establish that all impacts have been identified and appropriate mitigations provided. In some cases additional studies will have to be conducted, either to establish the criteria for a mitigated negative declaration or as a component of a project EIR. In all cases it is important that communities affected by control programs be given an opportunity to participate in decision-making, in an open and transparent process. The criteria for requiring any of several stages of environmental review and the process for conducting it should also be spelled out during this PEIR process. Explicitly providing these criteria now will help allay public anxieties about inappropriate attempts to avoid full review,

and also facilitate prompt action on the part of responsible agency staff in initiating follow-up studies when necessary.

- Future revisions. The PEIR will inevitably require regular revision, re-evaluation, and updates, not only to include pest control mechanisms that haven't been developed yet, but also to include possible negative consequences of existing substances and techniques that may be revealed by future scientific investigation. We recommend that the process and schedule for the revision process be spelled out in detail within the PEIR itself.

Sierra Club California looks forward to participating in further dialogue regarding the PEIR at all appropriate later occasions. Please keep us apprised of the release of any public drafts, and all future opportunities for comment.

Sincerely.

A handwritten signature in cursive script, reading "Michael Endicott".

Michael Endicott
Resource Sustainability Advocate
Sierra Club California
Work 916-557-1100
Cell 415-971-1652
sierrachub@aol.com



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ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8584

July 25, 2011

California Department of Food and Agriculture
ATTN: Michele Dias, Acting Chief Counsel
1220 N Street
Sacramento CA 95814
via email to: PEIR.info@cdfa.ca.gov

RE: Comments on Notice of Preparation for CDFA Statewide Pest Prevention Programmatic Environmental Impact Report

Dear Ms. Dias:

Please find enclosed comments on the June 23, 2011 Notice of Preparation for the Statewide Pest Prevention and Management Programmatic Environmental Impact Report (PEIR).

The attached comment letter describes research currently funded and under way by myself and my colleagues at University of California, Davis to transform the paradigm for agency policy and operations to manage pests.

We ask that at least one of the program alternatives analyzed in the PEIR be developed using the policy framework that will be prepared as part of the retreat planned for February, 2012. We believe it will be resource-effective for CDFA to benefit from the results input of this process of expert, collaborative transformation of the approach to pest policy and operations based on the latest academic and field research.

The purpose of the CEQA alternatives analysis in an EIR is to identify alternatives that would have fewer environmental impacts than the program proposed in the EIR. We expect that the new UCD approach will have significantly fewer environmental impacts than the state's current programs. In addition, it would save financial and personnel resources, be effective at controlling pests, ensure that policies are based on the best science, and potentially be more acceptable to the public because it would greatly reduce or eliminate reliance on widespread chemical intervention.

Sincerely,

A handwritten signature in blue ink, appearing to read "J.R. Carey".

James R. Carey, Professor
Department of Entomology
One Shields Ave.
University of California
Davis, CA 95616 USA

TOWARD A 21ST-CENTURY INVASIVE PEST POLICY: TRANSFORMING THE STRATEGIC FRAMEWORK

July 2011

CO-ORGANIZERS: Michael Parrella, Department of Entomology, UC Davis
Frank Zalom, Department of Entomology, UC Davis
James R. Carey, Department of Entomology, UC Davis

SPONSOR: College of Agriculture and Environmental Sciences, UC Davis

Background

To say that the invasive pest situation in California is near crisis would not be an exaggeration. During the past 25 years, there have been 126 emergency projects on the oriental fruit fly alone. From 1982 to 2008, the California Department of Food and Agriculture conducted 274 emergency eradication programs for the same 9 pests, including the medfly, Mexican fruit fly, guava fruit fly, melon fly, and peach fruit fly. Many of these programs have repeated annually. New pests recently added to this cycle of repeated treatments include the light brown apple moth (LBAM), European grapevine moth (EGVM), and Asian citrus psyllid (ACP). Data indicate that many of the insects that are the subjects of these programs are established residents in the state, so eradication is not feasible. In 2010, nearly 60,000 square miles or approximately a quarter of California's land area was under quarantine for 8 pests.

The pest management policies and operational tactics the state uses today are essentially updated versions of those originally formulated in the 1930s. These strategies do not meet current realities, including dramatically expanded urbanization, trade, human migration, and the state's ecological diversity. The current approach of identifying high-risk or "Class A" pests has outlived its usefulness. As indicated by the statistics above, eradication programs, once conceived of as temporary or at most intermittent, have become continuous for a number of pests, such as the medfly and oriental fruit fly. Realistically, agencies can only expend so many resources for so long on perpetual eradication programs for even a small number of species.

As global warming, expanding global trade, and other pressures increase the numbers of introduced species arriving in the U.S., it will become impossible for agencies to mount the financial and human resources to carry out eradication programs for scores of species (Myers et al. 2000). It is not feasible to exclude, monitor, and eradicate or manage all of these pests. Further, the direct cost of quarantine to growers plus the environmental and human health costs of using pesticides to reduce pest numbers below detection levels impacts the economy in ways that are not widely considered. A new approach is needed.

To date, efforts to improve the state's approach have focused on enhancing details of the outdated protocols currently in use rather than on revisiting the broad strategic framework for invasive pest policy and operations. The current approach relies on quarantines, chemical pesticide treatments (although the chemicals change, they all pose health and environmental risks, which are often discovered after the chemical has been registered for use), as well as so-called "softer" approaches such as sterile insect technology (SIT) and pheromone attractants. Although these approaches been heralded as the tools of the future, improvements in each of these tools have peaked so that only miniscule additional improvements can now be obtained in return for what are often monumental investments.

In short, attempting to improve the existing framework has achieved only marginal advances. After decades of experience, it is not reasonable to think that we will obtain a different result from modifying

the same approach, particularly given the magnitude of the problem.

Without major changes in invasive pest policy and operations, California is poised to enter a fourth decade a policy of repeated emergency pest eradication programs that are based on a 75-year-old approach that can never adequately address the list of pests currently defined as needing treatment in the state, let alone achieve real control of the pests that pose true threats to agriculture or native species.

In addition, the state operates today in a context where health environmental concerns are a public priority and must be integrated into the state's overall plan. The current policies cannot accommodate these public concerns because these policies are controlled by the state agency and do not obligate the agency to modify its actions in response to public input. If the state does not voluntarily enter into a meaningful partnership with the public to build a new strategy from the ground up, it will likely be forced to do so as a result of litigation as well as public and media pressure.

Breathtaking and revolutionary advances during the past decade in many areas of data-intensive science, including genetics, genomics, molecular biology, informatics, and modeling, can be applied to make invasive species policy more cost- and resource-efficient, more effective in preventing physical damage and satisfying economic and trade concerns, less burdensome and disruptive to farmers, and less dependent on widespread chemical intervention and therefore potentially more acceptable to the public. The scientific and technological advances of the past 10 years call on us to take stock, not just of specific tactics and protocols that are currently being used, but of the entire invasive pest paradigm, from monitoring and intervention to quarantine and trade. The whole and not just the individual components of overall invasion policy need to be transformed to enhance its congruency and the complementarity as well as to respond to pressure from an increasingly sophisticated public.

Approach & Outcomes

University of California at Davis (UCD) proposes a transformational agenda in which the entire program of state policies and operational protocols for pest management is reconceived.

History shows a “ground-up” re-envisioning of this type is best achieved with a small group of key thinkers and policy experts committed to innovation. An agenda of incremental improvements in the existing system (such as might be the focus of a large workshop made up of hundreds of participants and stakeholders as has been undertaken many times in the past) yields only small changes whereas what is needed now is nothing less than complete transformation.

The UCD process will initially bring together, for an intensive retreat at UCD in February 2012, 12-15 individuals from academia, agencies, industry, environmental organizations, and community advocates to: (1) Discuss and ultimately reframe the major components of invasive pest policy (i.e., exclusion, monitoring, intervention, trade); (2) Publish a position paper in a high-impact journal such as *Science* (in the Policy Forum section) and (3) create a plan to move the overall framework forward with series of topic-specific working groups (e.g., detection, quarantine) followed by a synthesis colloquium involving academia, industry, and state and federal agencies.

The outcome of the initial retreat in the re-envisioning process will be preparation of a 2,000 word policy paper that will be submitted to a high impact journal such as *Science* tentatively titled “*Towards a 21st century invasive pest policy in agriculture: Transforming the strategic framework*”. This paper will be patterned after the recent paper by Gomez et al [Gomez MI, et al (2011). Research principles for developing country food value chains. *Science*. **332**, 1154-1155]. Basic principles will be identified that will serve as the foundation upon which a new paradigm of invasive policy will rest. One of the overarching themes in this planned retreat is the convergence of two pest management and control paradigms, each of which have been in place for nearly a century—the Area-wide Control paradigm

typically associated with the USDA and the IMP paradigm more associated with academia. In the past decade these two different approaches have begun to converge. We believe that a 21st century paradigm will begin to emerge from the retreat that will be a mixture involving parts taken each of the old paradigms as well as new concepts and ideas from basic biology, ecology, and population biology, environmental sciences and economics.

Topics Areas

Below is a sampling of topics that would be addressed in the initial invasive pest paradigm transformation retreat and subsequent working group efforts:

1. **Dichotomous residency policy.** Currently, policy considers pest residency as dichotomous; that is, a pest is either present or absent (or on the way to eradication). In reality, there are degrees of residence along a “residence spectrum,” from a sole individual that dies without ever finding a mate to a resident continuously-breeding population. Zero tolerance is too extreme in many cases, for many reasons, including the economic infeasibility of enforcing such a standard. Therefore, management policy must be based on risk assessment. The key trade risk is the likelihood that an affected locality might EXPORT the pest in question. That risk is of course also impacted by the quarantine and biosecurity measures of the export partner (destination). This topic is directly related to the *Grower and Trade* topic below.
2. **Genetic observatories.** Although genetics is now being used to identify source regions for invasive agricultural pests of California, there are far greater potential uses for genetic information that could enable agencies to develop a more solid basis for pest strategies (Davies et al 1999.; Bohonak et al. 2001). Research initiatives are needed to build 21st-century “genetic observatories” that could provide unparalleled insight into the population dynamics of invasive (as well as other) species. These observatories could provide crucial empirical data on why some introductions lead to outbreaks (i.e., move up the residency risk spectrum) while others just peter out. Imagine a real-time visualization of the genetic flux of insects across a geographic area over many years, with vegetation, climate, and human activities (roads, ports, land-use) overlaid on it and algorithms for dynamically assessing risk to commerce (trade to specific destinations) and production/conservation (locally). Such a system could start relatively simply and increase in sophistication over time. It would provide an “eco-intelligent” strategic basis for USDA and CDFA to develop policies and establish appropriate monitoring infrastructure for application of these policies. While the research needed for full implementation of genetic observatories would not be available immediately, research in this area is moving extremely fast and within 2 to 3 years practical applications will almost certainly emerge.
3. **Control tools.** Endosymbiotic bacteria can provide a genetic modification (GM)-like approach, which is sometimes considered biocontrol, making it easier to gain acceptance and permits. Lethal semen is one candidate strategy that could kill females on mating rather than simply rendering them sterile as with current sterile insect technology (Lung et al. 2002). Although and other advances in the molecular biology of *Drosophila* have yet to find their way into the applied literature, they are ready to be tested in the field and could form the basis of a new approach to biological control.
4. **Arrival time of invasive pests.** Determining the arrival time of invasive pests is critical not only for understanding the biology of invasions but also to guide decisions for management and control (Carey et al. 1996). Estimating arrival time is typically difficult for several reasons, including: the size of invasive populations is often small; invasive species populations can grow in size undetected; and many species considered invasive here are also invasive in many other places, making it difficult to track invasion pathways based only on ecological presence/absence data. New “next-generation” DNA genotyping tools (for a review, see Metzker 2010) should allow us to estimate, at least qualitatively and perhaps also quantitatively, demographic parameters such as time since colonization, as well as founding population size and current population size. Previously, these tools

have been available only for model organisms such as humans and *Drosophila*, but they are now becoming accessible at reasonable cost for the study of non-model species, such as invasive pests (Roderick 1996).

5. **Invasion lags and “sleeper” pests.** Two important new concepts have emerged in the general invasion biology literature that have direct relevance to invasive agricultural pest research and policy. The first is time lags which can be found throughout the invasion process, including in the arrival, establishment, and impacts of invaders (Crooks and Soule 1999; Crooks 2005). Exotics can exist in relatively low numbers for decades before exploding, or invaders can become more aggressive over time and increase their numbers dramatically. Invasion-related lags are critical for efforts to manage invaders because they may lead us to make inaccurate assessments of the risks posed by invaders as well as miss critical windows for action. Recognition of the phenomenon of long lags before sudden changes in invader dynamics also suggests that we adopt a strict precautionary principle: long periods of seemingly consistent behaviour (e.g. extremely small populations) can be poor predictors of what invaders will do in the future. A complementary concept has emerged in the invasive weed literature referred to as “sleeper weeds” defined as a sub-group of invasive plant species whose population sizes are known to have increased significantly more than 50 years after they became naturalized (Groves 2006). These concepts could be integrated into both research and intervention policy within 3 to 5 years.
6. **Grower and trade.** A revisited invasive pest policy must evaluate ways of placing more responsibility with and power in the hands of the growers. Agreements between a buyer and a seller could, for example, be based on a minimum number of traps or detection counts that are defined as low risk, allowing the grower to ship. Or quarantine compliance could be based on inspections of shipments rather than farmers’ fields, such as is done for some imported produce. Placing the responsibility in growers’ hands is where pest policy is moving, of necessity. Government agencies have neither the funding nor the infrastructure to manage the likely increase in the number of invasive species that will accompany both global warming and the ever-increasing movement of invasive pests around the world. Strategies such as low-risk agreements, backed by the types of scientific research described in the subsections above, will minimize health and environmental impacts of pesticides, and, in this scenario, if pesticides must be used, their use by individual farmers will be “rifle” rather than the wide-area “shotgun” approach of an agency carrying out a regional program. Farmers can also avail themselves of sterile flies for applicable species, as Mexican mango growers use for Mexfly. Allowing each farmer to determine the strategy that makes most sense for his or her circumstances means that farmers whose produce might be devalued in the eyes of consumers if certain types of treatments are used will be able to make the choices that are best for their clientele. Trade policy in this scenario would involve certification from USDA/APHIS that a region is pest free (low risk) based on criteria worked out with a grower cooperative and could involve state-by-state and/or state-by-country agreements (i.e., conditional on agreed-upon risk level).

Via Electronic Mail

July 25, 2011

Attention: Michele Dias, Acting Chief Counsel
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, CA 95814
PEIR.info@cdfa.ca.gov

**Re: CDFA's Notice of Preparation of a Draft Programmatic Environmental
Impact Report for the Statewide Plant Pest Prevention and Management
Program**

Dear Ms. Dias:

The undersigned groups submit this comment letter on the California Department of Food and Agriculture's June 23, 2011 Notice of Preparation of a Programmatic Environmental Impact Report for the Statewide Plant Pest Prevention and Management Program. All of these groups join in and incorporate by reference the July 25, 2011 comment letter submitted by Earthjustice on behalf of California Environmental Health Initiative, MOMS Advocating Sustainability, and Center for Environmental Health.

Sincerely,

Pesticide Watch Education Fund
Paul Towers, State Director
Sacramento CA

City of Albany CA
Farid Javandel, Mayor

Gayle McLaughlin, Mayor
City of Richmond CA

San Francisco Baykeeper
Jason Flanders, Staff Attorney
San Francisco CA

California Sportfishing Protection Alliance
Bill Jennings, Executive Director
Stockton CA

Teens Turning Green
Erin Schrode

Marin County CA

Butte Environmental Council

Maggi Barry

Chico CA

Health & Habitat, Inc.

Dr. Sandra Ross, President

Mill Valley CA

Sustainable Marin

Stacy Weinberg Dieve, Board of Directors

Marin County CA

Sustainable Fairfax

Pam Hartwell-Herrero, Executive Director

Fairfax CA

**CDFG Statewide Plant Pest Prevention and Management Program
Draft EIR-CEQA Scoping Comments**

Name: Frank Zalom

Organization:

Mailing Address: 204 Lindo Place, Davis, CA 95616

Email: fgzalom@ucdavis.edu

Comments/Issues:

1. Introduction, sentence 1: I believe that developing an EIR for a proposed program seems premature. If an as yet undefined program is to be developed, how can one know whether a single EIR will be needed or appropriate?
2. Project Area: Figure 1 presents a map of the entire state, yet the sentence states there is the potential for a variety of pests to occur in a variety of areas. Given that it is inherently difficult to predict what pest(s) will occur, and when and what the appropriate response might be, a single document attempting to address all potential iterations seems to me to be meaningless unless the primary goal of the PEIR is to codify the ability to utilize any approach for any given situation. That would seem dangerous to me and could lead to cases where unanticipated outcomes may occur that could cause harm to the environment or human health.
3. Page 3, first bullet point: Clarify what is meant by this statement, especially 'new or more significant impacts' and how they are to be addressed. The process is unclear.
4. Page 3, last paragraph: What is meant by 'emergency' and what process is used to determine that something is an emergency? Including this exception allows CEQA or any EIR to be circumvented. A clear process to define an emergency would make this more acceptable. At what point does an emergency end? Is there a process for periodic re-evaluation of the emergency designation to determine if it remains valid?
5. Page 4, Pest Detection and Response: This section lacks specificity yet appears to be the basis of the proposed Statewide Program.
6. Page 4, Rapid Response/ Eradication section: Detection/delineation plays an important role in evaluating the population density and distribution. How is it determined if the most effective approaches are being used? It is mentioned that most pests spread rapidly – this is perhaps too generalized. Each pest is quite different from one another and spread may be more a function of intensity of delineation trapping and human transportation than of natural spread. These should be considered.
7. Page 4, Containment: I appreciate 'containment' being included as an option. How widely has containment been used as a response previously relative to eradication? Is there a mechanism for eradication to become containment?

8. Page 4, IPM (misspelled in second sentence): IPM is typically site and pest-specific, which is somewhat at odds with an overarching PEIR that portends to cover all possible responses for all pests and sites statewide. How are pest population thresholds used? This is clear in a containment program or once a pest is established, but it does not seem compatible with eradication or quarantine where the threshold is zero.
9. Page 6, first full sentence: Public (community) comment is necessary in the process of prescribing the use of a pest management tactic and this may change by circumstances (for example local community interests) – there should be provision for this.
10. Page 7, sentence beginning with ‘This scoping meeting information’: Will numbers attending these meetings and making comments (and affiliations) be reported as part of the process?
11. Page 11, Draft EIR: How is ‘threshold of significance determined, and by what standards are they determined? There may be different standards based on site and community interests. On bullet points, also include cost to farmers from quarantine and treatment costs, and include environmental impacts of increased use of pesticide by farmers to comply with quarantines and avoid detections.

General comment and question:

I feel that it would be better to take a broader view of invasive species detection and management than is currently practiced when developing the Statewide Plant Pest Prevention and Management Program, and that this is a necessary prerequisite to deciding if an EIR for the program is appropriate and what it should include. A new paradigm for the program should be based on identification and development of principles of detection and management that are not inhibited by structures and policies that have become established, although a new paradigm would likely draw upon existing research and experience.

I believe that it will still be necessary to have a meaningful opportunity for community comments/suggestions to help guide implementation of individual pest management projects in the future, even if a PEIR ‘checklist’ is used to define a response. There should be a clear mechanism for this to occur.

Has an assessment of whether or not a PEIR will indeed reduce the number of project-specific EIRs needed in the future been made?

Thank you for the opportunity to provide these written comments.

From: [Michael Stevenson](#)
To: [Michele Dias;](#)
cc: [Sandy Devoto;](#)
Subject: RE: PEIR Comments from Cal Fire
Date: Wednesday, July 27, 2011 11:46:34 AM

From: Smith, Tom [\[mailto:Tom.Smith@fire.ca.gov\]](mailto:Tom.Smith@fire.ca.gov)
Sent: Wed 7/27/2011 9:13 AM
To: Pest PreventionEIR
Subject: Comments from Cal Fire

Hi,

I am sorry that I am so late in submitting comments about the programmatic EIR. I had been on leave through a large portion of the time involved and missed the deadline. Even though it is after the deadline I figured I will send in some of the California Department of Forestry and Fire Protections thoughts anyway:

1. It is important to the forestry community that CDFA understand that all timber harvest plans in California are also covered by CEQA. Timber harvest plans must take into account cumulative impacts. Anything that CDFA does could have an impact on the Timber Plan Review process so it would be good to keep Cal Fire informed of any projects going on.
2. There is a concern about the potential defunding of weed management areas and the impact that this could have on noxious weed suppression/eradication efforts around the state.
3. The best control of any invasive pest is exclusion from the state in the first place. Cal Fire is concerned that the border stations be maintained to help in the exclusion process. The border stations have been instrumental in intercepting gypsy moth, emerald ash borer and other potential threats to the natural environment, urban resources and agriculture of California.
4. How well is exclusion of pests working at the international borders, ports, etc. We need to work with those folks in a more open manner.
5. Please keep the potential impact of exotic invasive pests on the wild lands, natural ecosystems, industrial and urban forests as well as agriculture in mind.
6. Cal Fire has a concern about pests that are native to the United States but not to California. They tend to not be covered by exotic pest programs but can still do considerable damage in these new environments. Examples of this are pitch canker disease (*Fusarium circinatum*) and the gold spotted oak borer. Neither pest is native to California but they are both native to other regions of the United States. Here in California they have killed huge numbers of trees. Similar problems could occur in agricultural crops. Such indigenous exotics should not be ignored. This issue could even be true within California, a large state with diverse ecosystems. For example an insect or disease from the far north of the state that has little impact there could cause havoc if accidentally moved to the southern reaches of the state.
7. Whenever lists of potential pests are presented that is a concern. What is a future pest is not

on the list. Anti-control activists could consider that we did not believe that those pests were truly pests in the past and therefore should not be trying to suppress/eradicate them. We have no idea what pests might be out there that could ultimately cause problems. An example would include sudden oak death (*Phytophthora ramorum*), a disease that was completely unknown until it appeared here in California and in Europe.

8. We do understand that this is a general PEIR and that individual pest incidents may require further EIRs.
9. We need to learn from the mistakes of the light brown apple moth project. It is absolutely important to educate the public and political leaders about what is going on for a successful project. Otherwise the public feels that they are not getting all of the information and that we are hiding things from them. They will also start to get their information from unreliable sources that tend to be trusted more than official scientists trying to do what is right for the public. We need to counteract the mis-information with extensive education. The people want to know what is going on, why, what it entails, when it will be done, where, how, all the options involved and why the option chosen was chosen. The more information the better!

Thanks,

Dr. Thomas F. Smith
Forest Pest Management
California Department of Forestry and Fire Protection
1416 9th Street
P.O. Box 944246
Sacramento, CA 94244-2460
916-599-6882
tom.smith@fire.ca.gov

California Department of Food and Agriculture
Attn. Michele Dias, Acting Chief Counsel
1220 N. Street, Suite 400
Sacramento, CA 95814
PEIR.info@cdfa.ca.gov

RECEIVED

JUL 28 2011

**OFFICE OF THE
CHIEF COUNSEL**



*Dedicated to ending
chemical and pesticide abuse*

Action Now
2219 West Olive Ave. #254
Burbank, CA 91506
(818)-762-6462

California Department of Food and Agriculture:
Statewide Plant Pest Prevention and Management Program
Draft EIR-CEQA Scoping Comment

Action Now urges the CDFa, while it is preparing the new Statewide Plant Pest Management Program Environmental Impact Report (PEIR), to make its first and strongest commitment to public safety. We maintain that healthier pest control alternatives are economically superior to toxic methods. CDFa and the public have learned over many years that using measures such as Sterile Insect Technique and Integrated Pest Management strategies that significantly minimize environmental exposures to toxic substances are more economically feasible than the methods that poison people and the environment.

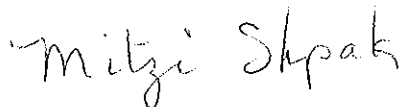
The tremendous economic costs of eradication programs must be determined holistically. Costs to the state, to individuals, to businesses, schools, counties and cities for healthcare, for lost productivity due to illnesses such as asthma and other health impacts, for the costs of battling lawsuits from an outraged public, etc., that we have seen from earlier eradication efforts, can and should be avoided.

We are deeply concerned that any environmental degradation that results from eradication programs will threaten pollinators and other sensitive or endangered species. The future of agriculture in this state depends on the well-being of our bees and other pollinators. Likewise, Organic farmers, who have created the fastest growing sector of the market, must be protected from destructive drift and intrusion by eradication efforts that do not conform to organic methods.

The efficacy of eradication programs must be demonstrated. California is a dynamic, bio-diverse state with numerous ecosystems and a multitude of crops. State treasure has been wasted in the past by futile efforts to eradicate ineradicable, established infestations. Steps should be taken to protect the public from untenable trade deals that barter the status of relatively minor pests which result in unnecessary and expensive eradication programs. Furthermore, the influence of global trade and climate change will bring increased need for the preventative strategies that true IPM mandates, as well as increased monitoring and research on safe alternatives.

Action Now is a grassroots, educational, nonprofit organization, dedicated to the prevention of the misuse of chemicals and pesticides. Our goal is clear. We urge you to use a precautionary approach to achieving control of pests and diseases. If scientific evidence can not assure the safety of a chemical or other procedure, we feel it is the responsibility of the state to re-evaluate the use of that procedure and to adopt the least-harmful strategies. We expect the implementation of all reasonable ways of preventing infestations from occurring in the first place, and we urge a thorough examination of a full range of the least-toxic alternatives that emphasize precaution as a part of any long term management plan.

Sincerely,

A handwritten signature in cursive script that reads "Mitzi Shpak". The ink is dark and the signature is fluid, with the first and last names clearly legible.

Mitzi Shpak
Executive Director
Action Now

From: [Michele Dias](#)
To: [Michael Stevenson;](#)
Subject: PEIR Comment: LBAM
Date: Monday, August 01, 2011 6:54:13 AM

From: leighako@aol.com [<mailto:leighako@aol.com>]
Sent: Sun 7/31/2011 4:10 PM
To: Pest PreventionEIR
Subject: LBAM

There was a very small window to submit public comments during times people often vacation and I hope mine will be acknowledged though late. Harming the respiratory tracts of individuals in the effort to protect the food system is a poor means to an end. Please do not treat these pests. Nature has a track record of coping with these issues. Please let it continue to do so. Do NOT upset the food system with chemicals.

Thank you,

Lee Kohl,
Sonoma County, Ca



GLENN COUNTY BOARD OF SUPERVISORS

Willows Memorial Hall, 2nd Floor
525 West Sycamore Street, Suite B1
Willows, CA 95988

John K. Viegas, District 1
Dwight Foltz, District 2
Steve Soeth, District 3
Michael Murray, District 4
Leigh W. McDaniel, District 5

August 18, 2011

The Honorable Jerry Brown
Governor of the State of California
State Capitol, Suite 1173
Sacramento, CA 95814

**RE: California Department of Food & Agriculture's (CDFA) Notice of Preparation for a
Statewide Plant Pest Prevention and Management Program EIR**

Dear Governor Brown:

On behalf of the Glenn County Board of Supervisors, we are writing to express our strong support for the CDFA's effort to develop a comprehensive and scientifically based Statewide Plant Pest Prevention and Management Program Environmental Impact Report (EIR). We share an interest in preventing the movement of destructive, invasive pests into and around the state in order to protect our food system and California's natural resources.

The Program EIR will be a comprehensive document based on integrated Pest Management principles. This in turn will provide for a strong scientific and technical foundation for an open decision making process when invasive pests are discovered. Public participation during the EIR development has been actively solicited through five scoping meetings and a web based meeting. This effort will strengthen the final document and provide for the highest level of transparency as it is developed. The final product will also include an ongoing process to evaluate and include new developments and potential environmental impacts while providing for continued public participation throughout the ongoing pest management process.

This tool will help those responsible for pest prevention to implement effective programs in full compliance with California Environmental Quality Act. We will also be able to better protect the economic vitality of our food system, protect jobs for many in economically depressed areas of the State, and protect California's unique environment.

Sincerely,

GLENN COUNTY BOARD OF SUPERVISORS


Steve Soeth, Chairman

cc: Karen Ross, Secretary of Agriculture

~ The County of Glenn is an Equal Opportunity Provider ~

August 27, 2011

Mr. Craig McNamara, President
CA State Board of Food & Agriculture
1220 N Street
Sacramento, CA 95814

Via email: farming@sbcglobal.net

**Re: Approval by DPR and OEHHA of the Chemical Treatments for Invasive Species to be Evaluated
in CDFA's Pest Programmatic Environmental Impact Report (PEIR)**

Dear Mr. McNamara:

During the State Board of Agriculture meeting on August 24, 2011, Dr. Leavitt stated that CDFA works with DPR to ensure that chemical applications do not exceed levels approved by DPR and also OEHHA. CDFA's Pest PEIR Project Manager has stated that the list of chemical treatments to be evaluated in the Pest PEIR would be sent to DPR and subsequently to OEHHA for their review.

One of the Board members commented during the meeting that the CDFA should look at other areas where risk analysis has been a factor, adding that CDFA needs to involve those who are concerned about the health and environmental consequences of chemical applications because there is no agreement on the scientific baseline for chemicals. This Board member's comment is particularly relevant in light of the news yesterday that DPR manipulated the results of their tests for methyl iodide in a non-scientific manner to make the risk appear less than the test results indicated and to justify their decision to approve this highly toxic chemical for use in California. This decision was not supported by the scientific evidence or testimony, and, based on the quote from former DPR head Mary-Ann Warmerdam cited below, was apparently motivated more by concern about what was desirable or acceptable to the pesticide's manufacturer than by concern about public health. In a document in which Ms. Warmerdam responds to recommendations, from her scientists, about how to protect workers from methyl iodide, Ms. Warmerdam writes that scientists' recommendations are "excessive" and may be "unacceptable" to the pesticide manufacturer. See the attached articles from The California Report of 8/26 and from HealthyCal on 8/25.

We have no doubt that many staff at the state agencies charged with protecting the residents of California are dedicated and unbiased. However, it is also clear that some agency staff will bend to the will of the chemical industry and are prepared to override their own scientists' research and results, such as happened with the methyl iodide decision process at DPR. We heard during the 8/24 Board meeting that CDFA would like to rebuild the public trust; however, given DPR's tarnished reputation, if CDFA is relying on DPR as the final word on the impacts of agricultural pesticides on human health and the environment, it is unlikely that much trust will be established.

Per the statements of PEIR Project Manager Michele Dias and the PEIR consultant's description of the risk assessment procedure, the CDFA will call upon DPR for the foundational analysis of the chemicals evaluated in the PEIR; the public cannot be expected to have confidence in the accuracy of DPR's analysis. Building upon this uncertain foundation will provide even less assurance to the public about the safety of the listed chemicals. During the LBAM controversy, state agencies continued to accept without question CDFA's claims regarding the declared emergency and the particle size of the Checkmate pesticide even after learning that these claims were not accurate. The public does not want to see a repeat of this situation. DPR and OEHHA analyses will also not relieve CDFA of the responsibility for performing its own meaningful environmental impact and risk analyses for any chemical intended for use in CDFA's programs, as one of our CEQA legal advisors explains:

"Courts have previously admonished the CDFA for violating CEQA based on its failure to meaningfully analyze the potential environmental impacts of proposed pesticide use. In Californians for Alternatives to Toxics v. Department of Food and Agriculture (2005) 136 Cal.App.4th 1, the Court of Appeal held that the CDFA abused its discretion in foregoing environmental analysis of use of pesticide products by relying solely on certified regulatory program of Department of Pesticide Regulation.

The Court's opinion states: "[o]ur review of the EIR reveals that CDFA repeatedly referred to the DPR regulatory scheme instead of analyzing environmental consequences of pesticide use and therefore fell short of its duty under CEQA to meaningfully consider the issues raised by the proposed project." (Id., p. 16.)

As the above court opinion makes clear, evaluation by DPR is not a sufficient basis for concluding that CDFA's use of a pesticide is safe or appropriate. And as members of the IPM panel at the State Board meeting on 8/24 stated, CDFA need not rely on pesticides in the manner that has become the agency's standard approach. The availability of safe alternatives to pesticides, the lack of objective scientific review by state agencies of pesticide safety, and the growing body of research indicating that exposure to even infinitesimal amounts of pesticides can have lifelong adverse health impacts all make clear to our organization that CDFA's approach has to change. We can no longer rely primarily on pesticides for pest management.

For this reason, the position of our coalition of 35 member organizations and cities is that the CDFA Pest PEIR based on treatment methods, the centerpiece of which is a long list of chemicals, is the wrong approach, and that preparing a PEIR now is premature because we should first pursue the independent "21st Century" invasive species paradigm work initiated at UC Davis. That work will bring together a focused but broadly representative group of experts and key stakeholders committed to transforming invasive species policy, not simply making adjustments in the outdated model in use currently.

We request that the State Board recommend to the CDFA that they pursue the UCD 21st Century approach in lieu of pushing forward with the Pest PEIR with its inherent problems.

Thank you for your continuing consideration of the public's concerns. Kindly provide a copy of this letter and attachments to your Board members. We look forward to your response.

Sincerely,

Jane Kelly, Nan Wishner, Thomas G. Kelly, JD, Lynn Elliott-Harding, RN, Board Members
California Environmental Health Initiative (CEHI)

Debbie Friedman, Co-Chair
MOMS Advocating Sustainability (MAS)

cc: Karen Ross, Secretary, California Department of Food and Agriculture (secretary.ross@cdfa.ca.gov)
Michele Dias, Acting Chief Counsel, California Department of Food and Agriculture (PEIRinfo@cdfa.ca.gov)
Office of Governor Edmund D. Brown, Jr., Attention Ken Alex, Senior Policy Advisor and OPR Director
and Cliff Rechtschaffen, Senior Advisor (fax 916-558-3160)
Diana S. Dooley, Secretary, California Health and Human Services Agency (fax 916/654-3343)
George Alexeeff, Acting Director, OEHHA (fax 916/327-1097)
Chris Reardon, Chief Deputy Director and Dr. Marylou Verder-Carlos, Assistant Director, DPR
(fax 916/324-1452 and email mverdercarlos@cdpr.ca.gov)

Attachments:

1. The California Report "Documents Detail Controversial Pesticide Approval", dated August 26, 2011
2. HealthyCal Article "Memos show staff questioned rationale for pesticide approval", dated August 25, 2011



<http://www.californiareport.org/archive/R201108260850/b>

[Fri, Aug 26, 2011](#)

Documents Detail Controversial Pesticide Approval

[Download audio \(MP3\)](#)



Donna Sutton/Flickr

Farmworkers in a strawberry field in California.

The state Department of Pesticide Regulation has released internal documents showing its own scientists did not support the decision to approve methyl iodide for use on strawberry fields. The documents were released by court order, in a lawsuit filed by environmental groups against the state. The suit argued that methyl iodide may cause cancer and miscarriages in farmworkers. Reporter: [Amy Standen](#)

Rachael Myrow: The state Department of Pesticide Regulation has released internal documents showing the agency's own scientists did not support the decision to approve the chemical methyl iodide for use on strawberry fields.

The documents were released by court order, in a lawsuit filed by environmental groups against the state. The suit argued that methyl iodide may cause cancer and miscarriages in farm workers. The California Report's Amy Standen has more.

Amy Standen: The question that plaintiffs have is this: Why did the state approve methyl iodide, allowing exposure levels more than 100 times higher than what staff scientists believed was safe?

When asked for documents that could spell out this decision, the head of the agency, MaryAnne Warmerdam declined to release them, saying they were legally protected. A public records request filed by KQED got the same response.

Earlier this month, a judge disagreed, and ordered the DPR to release the documents. Susan Kegley was one of the first to read them.

Susan Kegley: It's been very illuminating.

Standen: Kegley is a consulting scientist for Pesticide Action Network, one of the groups suing the state. She points to a document in which Warmerdam responds to recommendations, from her scientists, about how to protect workers from the chemical.

Kegley: Her method was to consult with the pesticide manufacture and determine what was acceptable to them, and then decide on what an acceptable level of exposure was.

Standen: In that document, for example, Warmerdam writes that scientists' recommendations are quote "excessive," and may be quote "unacceptable" to the pesticide manufacturer.

The newly-released documents show a deep rift between scientists who believed the chemical was dangerous, and Warmerdam, who approved it.

Referring to the DPR's allowable exposure levels for methyl iodide, a staff toxicologist wrote, quote, "I am puzzled by the numbers cited." And later, that Warmerdam's methods for reaching those exposure levels were quote, "not scientifically credible."

Warmerdam resigned in March and hasn't been replaced. DPR Spokeswoman Lea Brooks declined to comment on the documents, citing the pending litigation.

For the California Report, I'm Amy Standen

Myrow: The pesticide that methyl iodide replaced is also making news. The U.S. Environmental Protection Agency says state officials did violate the civil rights of Latino residents in several California communities when they approved the use of methyl bromide.

EPA officials note this move is a first for them. They have a backlog of about 30 similar civil rights complaints. The EPA's settlement with the state comes 12 years after Latino families in towns like Watsonville and Oxnard raised concerns about the use methyl bromide near schools.

Lawyers representing those families say they aren't happy with the settlement. Among other things, they point out it does nothing to protect children from the newly-approved replacement chemical methyl iodide.

<http://www.healthycal.org/archives/5554>

Memos show staff questioned rationale for pesticide approval

Posted By [Dan](#) On August 25, 2011 @ 9:00 pm In [California Health Report](#) | [No Comments](#)

By Robin Urevich

Environmentalists fighting to roll back the approval of a controversial pesticide released documents Thursday that they said show regulators put politics before science when they approved methyl iodide for use in California agriculture last December.

"They take all the technical numbers and do this mix and match," said Greg Loarie, an attorney for Earthjustice, which has sued the state Department of Pesticide Regulation on behalf of farm workers and environmental groups over its decision.

DPR spokeswoman Lea Brooks declined to comment, citing the pending litigation.

"Earthjustice is one of the litigants. It is inappropriate to try this case in the media," Brooks wrote in an email.

Methyl iodide, now marketed as Midas, is designed to kill weeds and soil pests before strawberry, tomato and host of other plants are put in the ground.

Its manufacturer, Arysta Lifesciences, has touted the chemical as a so-called drop-in replacement for methyl bromide, which many California growers had widely depended on, but which is now being phased out under the Montreal Protocol because it depletes the earth's ozone layer.

DPR scientists, however, concluded in early 2010 that it was only safe for use at low levels far away from homes and schools.

But in the last days of the Schwarzenegger administration, DPR managers appeared to disregard those conclusions and approved methyl iodide for use at concentrations 120 times higher than those its staff scientists had recommended.

An April 28, 2010 memo from primary state toxicologist Jay Schreider to supervisor Gary Patterson, which was released by Earthjustice Thursday questions the managers' decision-making process.

"I am.. puzzled by some of the numbers cited in the draft regulation on methyl iodide ...," Schreider wrote.

"They appear to have been extracted from different Mel [methyl iodide] risk assessment methodologies that are not interchangeable. Each approach is made up of a series of interrelated values and assumptions: one value or assumption is predicated on the preceding one. It is not scientifically credible to select a value or assumption from one and combine it with a value or assumption from another."

Schreider appears to have written his memo in response to a draft notice of decision dated the day before, in which DPR managers outlined a rationale for methyl iodide approval.

After looking over that draft, Dr. Susan Kegley, a consulting scientist for the Pesticide Action Network, which is also a plaintiff in the Earthjustice lawsuit, said DPR managers seemed to cherry pick numbers from two different mathematical models used to estimate methyl iodide's toxicity to humans.

"You can't take just the bits and pieces you want to get the number you want at the end," Kegley said.

Earthjustice obtained the memo and draft decision along with some 800 pages of methyl iodide material last week when Alameda County Superior Court Judge Frank Roesch ordered the DPR to release them in connection with the Earthjustice litigation.

DPR has staunchly defended its decision to register methyl iodide. Brooks pointed to a statement former DPR Director Mary Ann Warmerdam gave at a legislative hearing last February.

"The restrictions and conditions California has imposed on the use of methyl iodide products are the most stringent that exist in the United States, including those required by U. S. EPA," Warmerdam said.

The document release comes as Pesticide Action Network has launched a renewed effort to pressure the Brown administration to reverse the Schwarzenegger decision.

"We think today's release is enough information to give the governor and his administration pause to consider taking methyl iodide off the shelf," said Paul Towers, a spokesman for the group.

A spokesman for Gov. Brown declined to comment.

From: [Laura Smith](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Saturday, September 10, 2011 7:35:32 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Anaheim, California

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Wendy Chrisman](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 8:42:31 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Columbus, Ohio

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Tammy Du](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 1:17:00 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Goleta, California

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From: [Vanessa Enferadi](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 2:15:39 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

hayward, California

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From: [Jacqueline Garrett](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 12:32:38 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Columbus, Ohio

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From: [Ourelian J. Haley](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 7:41:18 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Hempstead, New York

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Tania Hays](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 11:15:58 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

portland, Oregon

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From: [Cynthia Henley](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 2:10:54 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Houston, Texas

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From: [Thomas Kruggel](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 3:40:38 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Kissimmee, Florida

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From: [Mikayla McAdams](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 11:35:37 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Riverside, Rhode Island

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From: [Henry Parker](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 4:42:39 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Fayetteville, North Carolina

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From: [Linda Porter](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 9:17:07 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

West Chicago, Illinois

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From: [David Rose](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 11:40:34 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Martins Ferry, Ohio

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From: [Madison Sanchez](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 10:11:40 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Salem, Oregon

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Rachel Scott](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 8:50:42 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Whitewater, Wisconsin

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From: [Sara Skierkiewicz](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 8:16:00 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Loveland, Ohio

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From: [Eliza Starbuck](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 8:20:54 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Brooklyn, New York

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From: [Maike Sudau](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 5:40:59 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Stevensville, Montana

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Mark Wiseley](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 11:14:26 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Santa Cruz, California

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Greg Wisserman](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Sunday, September 11, 2011 11:15:23 AM

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As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Milwaukee, Wisconsin

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Jennifer Belcastro](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Monday, September 12, 2011 8:45:59 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Los Angeles, United States Minor Outlying Islands

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Lauren McDonald](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Monday, September 12, 2011 2:57:29 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Menlo Park, California

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Laraine Irizarry](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Tuesday, September 13, 2011 10:55:32 AM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Austin, Texas

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

From: [Nissa Urban](#)
To: [Karen Ross, Secretary:](#)
Subject: Stop California's newly proposed pro-toxic pest control process
Date: Tuesday, September 13, 2011 12:10:54 PM

Greetings,

As a concerned citizen, I am writing to ask that you take immediate steps to curtail the newly proposed Programmatic Environmental Impact Report (PEIR) process for future invasive species eradication and control in California. I believe this approach fails to prioritize non-toxic and least-harmful pesticide and other control methods and is inappropriate for addressing the environmental and health concerns of the state of California and all those who depend on the agriculture produced there. Instead, I request that you consider the critical steps contained in the letter provided by Earth Justice to your department, which outline a process that allow for far more public input and protects the health of the people and the planet. I look forward to your swift action on this pressing issue. Sincerely ----- Stop The PIER process would provide an inappropriate "one size fits all" approach to species control that fails to prioritize the LEAST toxic methods, including harmful pesticides, and does not evaluate the risk of such approaches to vulnerable populations, such as children. It also could limit public feedback and information regarding pesticide use, especially on a case by case basis. For all these reasons, a coalition of environmental and health advocates are calling for a revised approach to pest control that would not only be less toxic, but less costly for the state. ----- Sincerely,

Tyler, Texas

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/stop-californias-pro-pesticide-pier-process. To respond, email responses@change.org and include a link to this petition. ☐

