

9 Water Resources

Chapter 9 evaluates potential impacts of the Marin/Sonoma Mosquito and Vector Control District's (MSMVCD or District) Integrated Vector Management Plan (IVMP) implementation on water resources. Results of the evaluation are provided at the programmatic level. Section 9.1, Environmental Setting, presents an overview of the physical properties and environmental settings; and contains federal regulations, state regulations, and local ordinances and regulations that are applicable to the Program. Section 9.2, Environmental Impacts and Mitigation Measures, presents the following:

- > Environmental concerns and evaluation criteria: A determination of whether the Program alternatives would cause any potentially significant impacts to regional hydrologic resources
- > Discussion of methods and assumptions, including findings from the Ecological and Human Health Risk Assessment, which is included as Appendix B
- > Discussion of potential impacts of the Program alternatives, and recommendations for mitigation, if required, for those impacts
- > Cumulative impacts summary
- > A summary of environmental impacts to hydrologic resources

9.1 Environmental Setting

9.1.1 California's Hydrologic and Geomorphic Regions

The hydrologic resources of California can be divided into regions based on several hydrologic characteristics. The California Water Plan divides California into 10 hydrologic regions. These regions are delineated based upon the state's major drainage basins. Each region has distinct precipitation characteristics and waterbodies.

Hydrologic regions over the District Program Area include portions of the North Coast and San Francisco Bay regions. The Program Area also overlaps a small portion of the Sacramento River hydrologic region. The District's Service Area (Marin and Sonoma Counties) and lands in adjacent counties (Lake, Mendocino, Napa, and Solano Counties) comprise the District's Program Area, and the hydrologic regions with important water features for the District are shown on Figure 9-1. Description of surface and groundwater characteristics for the differing hydrologic regions relied on *California Water Plan, Update 2009* and *California Water Plan, Update 2013, Advisory Committee Review Draft* (CDWR 2009a-c, 2013a-d).

9.1.1.1 **San Francisco Bay Hydrologic Region**

The San Francisco Bay Hydrologic Region (Bay Region) occupies approximately 4,500 square miles, from Tomales Bay in Marin County to southern Santa Clara County, and inland to the confluence of the Sacramento and San Joaquin Rivers near Collinsville. The eastern boundary follows the crest of the Coast Range where the highest peaks are more than 4,000 feet above mean sea level (CDWR 2013b). This region includes portions of Marin, Sonoma, Napa, Solano, San Mateo, Santa Clara, Contra Costa, and Alameda counties.

Principle watersheds in the Bay Region include Tomales Bay, Corte Madera Creek, Novato Creek, Petaluma River, Sonoma Creek, Napa River, Wildcat Creek, San Pablo Creek, Green Valley Creek, Suisun Creek, Walnut Creek, San Mateo Creek, San Francisquito Creek, Guadalupe River, Coyote Creek, Alameda Creek, San Lorenzo Creek, and San Leandro Creek watersheds. These watersheds drain into Suisun, San Pablo, North San Francisco, and South San Francisco bays, or directly into the

Pacific Ocean. For example, the Guadalupe River and Coyote and Alameda creeks drain from the Coast Range and flow northwest into San Francisco Bay. The Napa River originates in the Mayacamas Mountains at the northern end of Napa Valley and flows south into San Pablo Bay. Sonoma Creek begins in mountains within Sugarloaf State Park and flows south through Sonoma Valley into San Pablo Bay.

A large proportion of the nine counties that surround the San Francisco Bay is urbanized. As a result, many creeks have been confined to underground culverts beneath the developed regions. While many larger creeks remain open, they often have been heavily modified to run in concrete channels to optimize flood conveyance and provide flood protection. Ownership of Bay Area streams is a patchwork of public title, public easements, and private ownership that complicates policies and jurisdiction over, or maintenance responsibility for, urban streams. Many Bay Area stream reaches have, in fact, no established public jurisdiction or maintenance responsibility (RMC 2006).

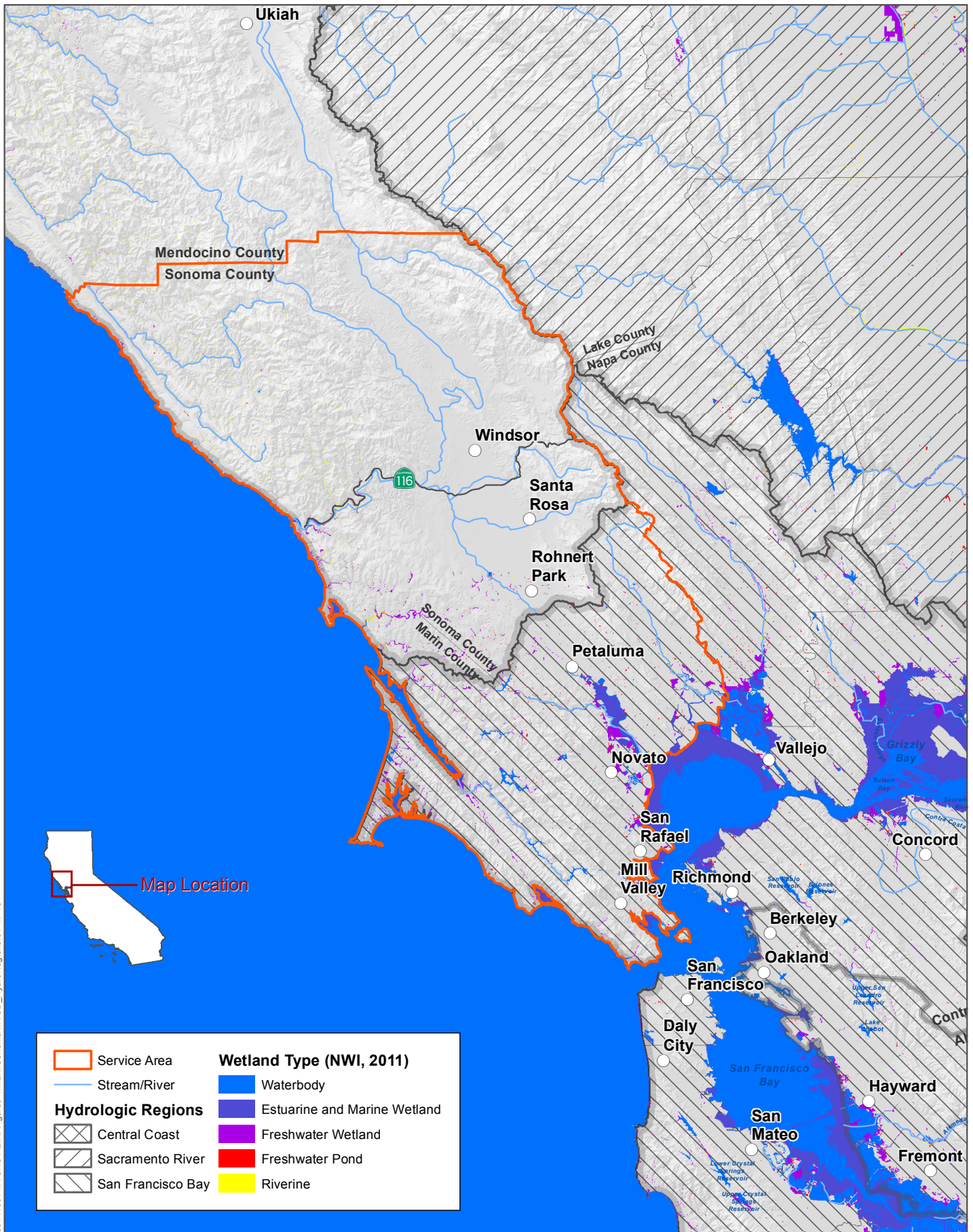
Tidal marshes occur throughout much of the fringe of the San Francisco Bay, from the lowest extent of vascular vegetation to the top of the intertidal zone (at the maximum height of the tides). Tidal marsh also exists in the tidal reaches of local rivers and streams. Tidal marshland was once more extensive and was estimated to be 190,000 acres; however, development in the region has decreased the amount of tidal marshland to approximately 40,000 acres. A large effort has recently been undertaken to restore these ecosystems. High-quality wetlands have been shown to moderate the effect of floods, improve water quality, help maintain shipping channels, and provide habitat to numerous species (Goals Project 1999).

Like most of Northern California, the climate in the Bay Region largely is governed by weather patterns originating in the Pacific Ocean. About 90 percent of the annual precipitation falls between November and April. The North Bay receives about 20 to 25 inches of precipitation annually. In the South Bay, east of the Santa Cruz Mountains, annual precipitation is only about 15 to 20 inches because of the rain shadow effect. Temperatures in the Bay Region generally are cool, and fog often resides along the coast. The inland valleys receive warmer, Mediterranean-like weather (average summer high temperatures are about 80 degrees Fahrenheit). The gap in the rolling hills at Carquinez Strait allows cool air to flow from the Pacific Ocean into the Sacramento Valley. Most of the interior North Bay and the northern parts of the South Bay are influenced by this marine effect. By contrast, the southern interior portions of the South Bay experience very little marine air movement (CDWR 2013b).

Land use in the Bay Region is diverse. Residents live in urban, suburban, and rural areas. Some of these areas are on natural floodplains, which historically were used for agriculture. Agriculture accounts for 21 percent of the Bay Region's land area, most of which is in the North and Northeast Bay in Napa, Marin, Sonoma, and Solano counties. Santa Clara and Alameda counties also have significant agricultural acreage at the edge of urban development (CDWR 2013b).

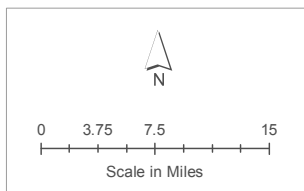
The region has many significant water management challenges: sustaining water supply, water quality, and the ecosystems in and around San Francisco Bay; reducing flood damages and adapting to impacts from climate change. Numerous government agencies and water districts deliver, treat, and regulate water in the Bay Region. Many planning organizations identify present and future challenges in the region such as land use, housing, environmental quality, economic development, wetlands, water quality, water reliability, stormwater management, flood protection, watershed management, groundwater management, fisheries, and ecosystem restoration (CDWR 2013b).

Groundwater basins underlie approximately 1,400 square miles or 30 percent of the Bay Region and account for about 15 percent of the region's average annual water supply. The Bay Region has 25 identified groundwater basins, as shown on Figure SFB-3 (CDWR 2013b) The Santa Clara Valley, Livermore Valley, Westside, Niles Cone, Napa-Sonoma Valley, and Petaluma Valley are heavily used groundwater basins (CDWR 2013b).



33441001 M/CAC PEIR, Figure 9-1, Marin/Sonoma M/CAC PEIR, HydroRegions, 04-17-13

Source: Cardno ENTRIX, 2013



INTEGRATED VECTOR MANAGEMENT PROGRAM PEIR

Marin/Sonoma Mosquito & Vector Control District

Figure 9-1 - Program Area and California Hydrologic Regions with Major Water Bodies

Ongoing surface water quality issues exist in the Bay Region. Pollutants from urban and rural runoff include pathogens, nutrients, sediments, and toxic residues. Some toxic residues are from past human activities such as mining; industrial production; and the manufacture, distribution, and use of agricultural pesticides. These residues include mercury, polychlorinated biphenyls, selenium, and chlorinated pesticides. Emerging pollutants in the region include flame retardants and pharmaceuticals.

San Francisco Bay and a number of the streams, lakes, and reservoirs in the Bay Region have elevated mercury levels, as indicated by elevated mercury levels in fish tissue. The major source of the mercury is historic mercury mining and mining activities in the Sierra Nevada and coastal mountains. Large amounts of contaminated sediments were discharged into the Bay from Central Valley streams and local mines in the Bay Area. Significant impaired waterbodies include the Bay, the Guadalupe River in Santa Clara County (from New Almaden Mine discharges), and Walker Creek in Marin County (from Gambonini Mine discharges). The SFBRWQCB has adopted total maximum daily loads (TMDLs) for mercury in the Bay, Guadalupe River, and Walker Creek (CDWR 2013b).

Water agencies in the region have relied on importing water from the Sierra Nevada for nearly a century to supply their customers. Water from the Mokelumne and Tuolumne rivers accounts for about 38 percent of the region's average annual water supply. Water from the Delta via the federal Central Valley Project and the State Water Project accounts for another 28 percent. Approximately 31 percent of the average annual water supply is from local groundwater and surface water, and 3 percent is from miscellaneous sources. Population growth and concerns over diminishing water quality have led to the development of local surface water supplies, recharge of groundwater basins, and incorporation of conservation guidelines (CDWR 2013b).

Drinking water in the Bay Region ranges from high-quality Mokelumne and Tuolumne river water to variable-quality Delta water, which constitutes about one-third of the domestic water supply. Purveyors that depend on the Delta for all or part of their domestic water supply can meet drinking water standards, but still need to be concerned about microbial contamination, salinity, and organic carbon.

The Bay Region generally receives very little snow, so floodwaters originate primarily from intense rainstorms. The northern portion of the region receives more precipitation and floods more often than the southern portion. Flooding occurs more frequently in winter and spring and can be intense with a short duration in small watersheds with steep terrain. Local flooding tends to occur when large, widespread storms fall on previously saturated watersheds that drain into local valleys. The greatest flood damages occur in the lower reaches of streams when floodwaters spill onto the floodplain and spread through urban neighborhoods (CDWR 2013b).

Drought, overdraft, and pollution have impaired portions of 28 groundwater basins in the Bay Region. The basins face a perpetual threat of contamination from spills, leaks, and discharges of solvents, fuels, and other pollutants. Contamination affects the supply of potable water and water for other beneficial uses. Some municipal, domestic, industrial, and agricultural supply wells have been removed from service due to the presence of pollution, mainly in shallow groundwater zones. Overdraft can result in land subsidence and saltwater intrusion, although active groundwater management has stopped or reversed the saltwater intrusion (CDWR 2013b).

A variety of historical and ongoing industrial, urban, and agricultural activities and their associated discharges have degraded groundwater quality, including industrial and agricultural chemical spills, underground and aboveground tank and sump leaks, landfill leachate, septic tank failures, and chemical seepage via shallow drainage wells and abandoned wells. The region has over 800 groundwater cleanup cases, about half of which are related fuel spills from leaking underground tanks. In many cases, the groundwater is treated and discharged to surface waters via storm drains (CDWR 2013b).

9.1.1.2 North Coast Hydrologic Region

The North Coast Hydrologic Region (North Coast region) encompasses all basins draining into the Pacific Ocean from the Oregon state line to Tomales Bay in Marin County. This region includes coastal areas, redwood forests, inland mountain valleys, and semidesert-like areas. The southern tip of this region includes a portion of Sonoma and Marin counties. Watersheds within Sonoma and Marin counties include Gualala River, Russian River, and Bodega; characteristics of these watersheds are described at the end of this section.

In the North Coast region, topographic relief can be steep and precipitation is generally high relative to the rest of the state. Heavy rainfall over the mountainous portions of the North Coast region (up to 100 inches per year) makes it California's most water-abundant area. The western coastal portion of this region receives less rainfall (e.g., at Bodega Bay in Sonoma County, annual precipitation is about 37 inches). Average temperatures are moderated by the influence of the Pacific Ocean and range from highs in the mid-80s in the summer to lows in the mid-30s during the winter (CDWR 2013c).

The North Coast region is generally forest land with agricultural land concentrated in narrow river valleys. Land use issues in the region include activities causing soil erosion such as road construction, logging and hillside agriculture (vineyards), which can affect native fish spawning. Many of the region's watersheds support threatened and endangered species of plants and animals, and many North Coast streams and rivers support runs of salmon and steelhead trout. Forest management practices are also a significant issue impacting flood management.

The North Coast region contains water service providers of all types, from small, private facilities that provide water for just a few neighboring residences to large municipal suppliers and wastewater treatment facilities. Private water districts include those representing counties or portions of counties, municipalities, irrigation districts, or particular waterbodies. Many of the smaller communities and rural areas in the North Coast region are generally supplied by small local surface and groundwater systems. In general, for the North Coast region, groundwater contamination from leaking underground tanks and health and safety issues from contaminated areas that are open to the public are identified by the California Department of Water Resources as priority issues related to groundwater quality (CDWR 2009c). Additionally, groundwater quality problems in the North Coast region include contamination from seawater intrusion and nitrates in some shallow coastal groundwater aquifers, and iron, boron, and manganese in some of the inland groundwater basins of Sonoma County (CDWR 2009c).

One of the largest water supply reservoirs in the North Coast region includes USACE's 380,000 acre-foot Lake Sonoma in the Russian River watershed. Lake Sonoma is operated to provide flood control and instream flows in the Lower Russian River in Sonoma County. This facility provides water for instream flows, recreation, hydropower, and water supply purposes (CDWR 2013c).

9.1.1.2.1 Southern Watersheds

The Gualala River watershed encompasses about 300 square miles; the Gualala River flows from Mendocino County to Sonoma County in a north-south direction, reaching the ocean at the town of Gualala. The watershed contains mostly mountainous terrain where tributaries flow through steep valleys with narrow floors that contain erodible soil. Most of the annual precipitation occurs between October and April, with the greatest amounts in January. Rainfall averages about 38 inches per year at the coast and up to 100 inches per year on the inland peaks. Timber companies own about one-third of the watershed. Orchards and ranching are on the decline while the watershed has seen an increase in hillside vineyard development. The watershed supports an anadromous fishery that includes Coho salmon. The Gualala River provides the primary source of drinking water for Sea Ranch and Gualala (CDWR 2013c).

The Russian River watershed encompasses 1,485 square miles in Mendocino and Sonoma counties. It is bounded by the Coast Ranges on both the east and west. The mainstem is about 110 miles long and flows from north of Ukiah southward through Redwood Valley (Mendocino County) to its confluence with

Mark West Creek, where it turns west, passes through the coast range, and empties into the Pacific Ocean. The summer climate is moist and cool near the coast with temperatures increasing in the valley areas, which are isolated from the cooling coastal influence. During winter, average rainfall ranges from 30 to 80 inches, depending on locale. The Russian River watershed is primarily an agricultural area with the greatest emphasis on vineyard and orchard crops. Besides agriculture, a growing trend toward light industry and commercial development and a significant telecommunications industry are noticeable within the region (CDWR 2013c).

The Bodega watershed contains streams with headwaters in the Coast Range entering the Pacific Ocean south of the Russian River. Salmon, Americano, and Stemple creeks and their associated estuaries are the main waterbodies in this watershed. The terrain is relatively steep and erodible and is sensitive to disturbance. Cooler temperatures and relatively high winter rainfall due to coastal influences typify the climate of the Bodega watershed. Because of the Mediterranean climate, summertime flows are often nonexistent in Americano and Stemple creeks, while Salmon Creek flow is low but sustained. Each of these watersheds has estuary areas (CDWR 2013c).

9.1.1.3 Existing Water Quality

Statewide and regional surface water monitoring has identified pesticides in surface waters and sediments throughout the Program Area and vicinity. A query of water quality data available through the California Environmental Data Exchange Network (CEDEN) water quality database revealed detectable quantities of several chemicals that the District will use and several additional chemicals of the same class (i.e., pyrethroids). See Tables 2-1 through 2-5 for a list of all chemicals the District uses or proposes to use.

The following is a summary of CEDEN data from 1993 to 2012 regarding the concentrations of these chemical constituents when detected and the waterbodies in which they were discovered (CEDEN 2013). In addition to the CEDEN data, the list below includes Water Year 2012 Regional Monitoring Coalition pesticide results (BASMAA 2013). The Regional Monitoring Coalition was formed to implement the monitoring program required by the Municipal Regional Stormwater NPDES Permit (Order R2-2009-0074) issued by the SFBRWQCB. In consideration of their more frequent usage and potentially greater toxicity compared with other commonly applied pesticides used in this geographic region, monitoring of the class of pesticides known as pyrethroids was conducted by the Regional Monitoring Coalition to explore potential causes of toxicity to *Hyalella azteca* in sediments. Based on monitoring results, BASMAA (2013) concluded that it is likely that pyrethroids caused toxicity in water year 2012.

- > Allethrin was detected in sediments of various bays in the region including Central Bay, Grizzly Bay, San Pablo Bay (Pinole Point), San Francisco Bay (Yerba Buena Island), and Suisun Bay. Concentrations ranged from 0.238 to 5.61 micrograms per kilogram ($\mu\text{g}/\text{kg}$) in these bay sediments. Allethrin concentrations within Sacramento River and San Joaquin River sediments ranged from 0.33 to 2.13 $\mu\text{g}/\text{kg}$.
- > Esfenvalerate/fenvalerate were detected in Central Bay, Grizzly Bay, and Lower South Bay sediments in concentrations ranging from 0.163 to 0.577 $\mu\text{g}/\text{kg}$. Tembladero Slough sediments also contained esfenvalerate/fenvalerate concentrations of up to 60.8 $\mu\text{g}/\text{kg}$.
- > The concentration of all permethrin isomers detected in the water column of the Hayward Industrial Storm Drain ranged from 1.57 to 285 nanograms per liter (ng/L). Sunnyvale East Channel, Guadalupe River, and Lower Marsh Creek sediments contained concentrations ranging from 3.81 to 20.9 $\mu\text{g}/\text{kg}$. Cis- and trans-permethrin isomers were detected in Central Bay, Grizzly Bay, Lower South Bay, San Pablo Bay (Pinole Point), South Bay, and Suisun Bay sediments in concentrations ranging from 0.10 to 1.32 $\mu\text{g}/\text{kg}$. Cis- and trans- isomers were also detected in Coyote Creek, Redwood Creek, San Leandro Creek, and Tembladero Slough sediments in concentrations 0.12 to 25.6 $\mu\text{g}/\text{kg}$. Only the cis- isomer of permethrin was detected in Guadalupe Creek, Laurel Creek, Salinas River, and San Mateo Creek sediments in concentrations ranging from 3.22 to 11.1 $\mu\text{g}/\text{kg}$. Trans-permethrin was the

only isomer detected in Lagunitas Creek and the Pajaro River sediments in concentrations ranging from 4.06 to 4.52 µg/kg.

- > Phenothrin was detected in Central Bay and San Francisco Bay (Yerba Buena Island) sediments in concentrations ranging from 0.988 to 4.81 µg/kg.

Additional queries were made to the USEPA's ECOTOX database to compare regional water quality data to available ecological toxicity data (see Table 9-1). The toxicology data are expressed in LC50. The LC50 value is used as a standard measure of toxicity for evaluation and comparison of chemicals. LC50 refers to the lethal concentration of a chemical (amount of chemical in a volume of food, water, or air) that that would kill 50 percent of a group of test animals exposed to the chemical for a defined exposure time. Chemicals with lower LC50 values are more toxic. The LC50 values in Table 9-1 are populated from the lowest available constituent concentrations in which a 50 percent die-off for the test species is observed (USEPA 2013). LC50 values are not available for sediment. Freshwater and saltwater values are provided where available.

A 2010 study performed by the CDPR analyzed the presence of pyrethroid insecticides in California's surface waters from urban areas. The most frequently detected pyrethroids were bifenthrin followed by permethrin and cyfluthrin. These pyrethroids are found in many common household insecticides. Bifenthrin and cyfluthrin, which the District does not use, were detected with the highest concentrations in both water and sediment. Detected concentrations of bifenthrin and cyfluthrin exceeded the acute toxicity benchmarks for fish and for aquatic invertebrates in more than 8 and 12 percent of the water samples, respectively (CDPR 2010b).

Table 9-1 Pesticide Concentrations in Surface Water and Sediment throughout the Program Area and Vicinity (1993 to 2012)

Pesticide	Sediment		Water			
	Concentration (µg/kg)	LC50 (µg/kg)	Concentration (ng/L)	LC50 (ng/L)	Standard Test Species	Exposure Time
Allethrin	0.238 - 5.61	*	NA	1,800	Coho Salmon (<i>Oncorhynchus kisutch</i>)	96-hour exposure in Freshwater Medium
Permethrin	3.81 - 20.9	*	1.57 - 285	2	Channel Catfish (<i>Ictalurus punctatus</i>)	96-hour exposure in Freshwater Medium
				4	Amphipod (<i>Eohaustorius estuarius</i>)	48-hour exposure in Saltwater Medium
Cis- and Trans-Permethrin Isomers	0.10 - 25.6	*	*	465	Water Flea (<i>Ceriodaphnia dubia</i>)	96-hour exposure to Cis-Permethrin in Freshwater Medium
Phenothrin	0.988 - 4.81	*	*	140	Rainbow Trout (<i>Oncorhynchus mykiss</i>)	96-hour exposure in Freshwater Medium
				21	Opossum Shrimp (<i>Americamysis bahia</i>)	96-hour exposure in Saltwater Medium

*No Data Available

9.1.2 **Regulatory Setting**

The Program includes activities under the jurisdiction of federal, state, and local agencies. Applicable regulations are summarized below and include aspects related to both surface water and groundwater. The primary focus of this regulatory summary is the water quality aspects related to the Program alternatives. Because the Program will not cause changes to natural precipitation patterns, runoff, or groundwater infiltration, changes to water quantity are not anticipated.

9.1.2.1 ***Federal***

9.1.2.1.1 **Federal Clean Water Act (33 USC Section 1251 et seq.)**

The USEPA is the federal agency responsible for water quality management and administers the federal Water Pollution Control Act Amendments of 1972 and 1987, collectively known as the Clean Water Act (CWA). The CWA establishes the principal federal statutes for water quality protection. It was established with the intent “to restore and maintain the chemical, physical, and biological integrity of the nation’s water, to achieve a level of water quality which provides for recreation in and on the water, and for the propagation of fish and wildlife.” Several key CWA sections guide the regulation of water pollution in the US:

- > Section 208, Water Quality Control Plans. This section requires the preparation of local water quality control plans throughout the nation. Each water quality control plan covers a defined drainage area. The primary goal of each water quality control plan is to attain water quality standards established by the CWA and the state governments within the defined area of coverage. Minimum content requirements, preparation procedures, time constraints, and federal grant funding criteria pertaining to the water quality control plans are established in Section 208. The USEPA has delegated preparation of the water quality control plans to the individual states. More information is provided below in the state regulatory setting section.
- > Section 303(d) Water Quality Limited Surface Waters. This section requires each state to provide a list of impaired waters that do not meet or are expected not to meet state water quality standards as defined by that section. It also requires the state to develop TMDLs from the pollution sources for such impaired waterbodies. Novato Creek, Miller Creek, Gallinas Creek, San Rafael Creek, Corte Madera Creek, Arroyo Corte Madera Del Presidio, and Coyote Creek, located in Marin County, and Calabazas Creek, Petaluma River, and San Antonio Creek, located in Sonoma County, are listed as impaired for diazinon. Water quality degradation of these urban creeks by diazinon is addressed by a completed and approved TMDL program. See the state regulatory setting section (Section 9.1.2.2) for description of the Diazinon and Pesticide-Related Toxicity in Urban Creeks TMDL. San Pablo Bay and Central San Francisco Bay are downstream waterbodies that are listed for chlordane, dieldrin, and dichlorodiphenyltrichloroethane (DDT), which are persistent organochlorine pesticides and legacy pollutants. Note that the District is not proposing to use diazinon or any of these pesticides.
- > Section 401, Water Quality Certifications. This CWA section requires that, prior to the issuance of a federal license or permit for an activity or activities that may result in a discharge of pollutants into waters of the US (see Section 404 discussion, below), the permit applicant must obtain a certification from the state in which the discharge would originate. A state certification indicates that the proposed activity or activities would not result in a violation of applicable water quality standards established by federal or state law, or that no water quality standards apply to the proposed activity. The SWRCB and/or the nine RWQCBs administer the certification program in California.
- > Section 402, NPDES. The NPDES requires permits for pollution discharges (except dredge or fill material) into waters of the US, such that the permitted discharge does not cause a violation of federal and state water quality standards. Biological and residual pesticides discharged into surface waters constitute pollutants within the meaning of the CWA and require coverage under an NPDES permit. NPDES permits define quantitative and/or qualitative pollution limitations for the permitted source and control measures that must be implemented to achieve the pollution limitations. Pollution control

measures are often referred to as BMPs. In California, NPDES permits are issued by the SWRCB or the RWQCBs.

- > **Section 404, Discharge of Dredge and Fill Material.** Section 404 assigns the USACE with permitting authority for proposed discharges of dredged and fill material into waters of the US, defined as "...waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; territorial seas and tributaries to such waters." The USACE typically considers all natural drainages with defined beds and banks to be waters of the US. Section 404 establishes procedures by which the permitting agency is to review, condition, approve, and deny permit requests. Per the regulations, permitting agencies are responsible to conduct public noticing and provide the opportunity for public hearings during the review of each permit request. This responsibility includes informing the USFWS and/or NMFS of each permit request. Consultation with the USFWS and/or NMFS is required for proposed discharges that could affect species protected by the federal Endangered Species Act. Measures that are required by the USFWS and/or NMFS to minimize impacts to federally protected species must be included as conditions of the permit. The USACE also authorizes, with limited application requirements and associated delay, certain activities with minimal adverse effects on the environment, under nationwide permits. Currently, 50 nationwide permits exist, of which about half require preconstruction notification, which USACE reviews to verify the activity qualifies for the nationwide permit.

9.1.2.1.2 Federal Insecticide, Fungicide, and Rodenticide Act

The FIFRA was first passed in 1947 to establish labeling provisions and procedures for registering pesticides with the USDA. It was rewritten in 1972 and has since been amended several times. In its current form, FIFRA mandates that USEPA regulate the use and sale of pesticides to protect human health and preserve the environment. Registration with the USEPA assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment. Pesticide use in California is also regulated by the CDPR and local County Agricultural Commissioners.

9.1.2.1.3 California Toxics Rule

The USEPA has developed water quality criteria for priority toxic pollutants and other provisions for water quality standards to be applied to inland surface waters, enclosed bays, and estuaries in California. This rule was developed to address a gap in California's water quality standards that was created when the state's water quality control plans containing water quality criteria for priority toxic pollutants were overturned in 1994. The established numerical standards were deemed necessary to protect human health and the environment. The rule includes ambient aquatic life criteria for 23 priority toxic pollutants, ambient human health criteria for 57 priority toxics, and a compliance schedule.

9.1.2.1.4 Safe Drinking Water Act of 1974

The federal Safe Drinking Water Act of 1974 is the main federal law that regulates drinking water quality. This act authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water. With the passage of the federal Safe Drinking Water Act of 1974, the USEPA established and enforced mandatory nationwide minimum standards. California adopted its own Safe Drinking Water Act in 1976 that gave California Department of Health Services (now CDPH) responsibility for the administration of the federal Safe Drinking Water Act in California. Under this program, the USEPA has delegated primary responsibility for setting and enforcing drinking water standards to the CDPH.

9.1.2.1.5 Rivers and Harbors Act

The Rivers and Harbors Act (RHA) of 1899 prohibits the unauthorized alteration or obstruction of any navigable waters of the US. As defined by the RHA, navigable waters include all waters that are:

- > Historically, presently, or potentially used for interstate or foreign commerce
- > Subject to the ebb and flow of tides

Regulations implementing RHA Section 10 are coordinated with regulations implementing CWA Section 404. The RHA specifically regulates:

- > Construction of structures in, under, or over navigable waters
- > Deposition or excavation of material in navigable waters
- > All work affecting the location, condition, course, or capacity of navigable waters

The USACE administers the RHA. If a proposed activity falls under the authority of RHA Section 10 and CWA Section 404, the USACE processes and issues a single permit. For activities regulated only under RHA Section 10, such as installation of a structure not requiring fill, permit conditions may be added to protect water quality during construction.

Program activities are not anticipated to affect any facilities that would be regulated under the RHA.

9.1.2.2 State

9.1.2.2.1 Porter-Cologne Act

The Porter-Cologne Act (California Water Code Section 13000) is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and groundwater, and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act, it is the policy of the State of California that:

- > The quality of all the waters of the state shall be protected.
- > All activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason.
- > The state must be prepared to exercise its full power and jurisdiction to protect the quality of water in the state from degradation.

Pursuant to the Porter-Cologne Act, the responsibility for protection of water quality in California rests with the SWRCB. The SWRCB administers federal and state water quality regulations for California's ocean waters and also oversees and funds the state's nine RWQCBs. The RWQCBs prepare water quality control plans, establish water quality objectives, and carry out federal and state water quality regulations and permitting duties for inland waterbodies, enclosed bays, and estuaries within their respective regions. The Porter-Cologne Act gives the SWRCB and RWQCBs broad powers to protect water quality by regulating waste discharge to water and land and by requiring cleanup of hazardous wastes.

9.1.2.2.2 State Antidegradation Policy

The SWRCB adopted the Statement of Policy with Respect to Maintaining High Quality Water in California (Resolution No. 68-16) on October 28, 1968. This policy is generally referred to as the "Antidegradation Policy" and protects surface water and groundwater where existing water quality is higher than the standards set by the Water Quality Control Plan (or Basin Plan) to protect beneficial use of the waters. Under the Antidegradation Policy, any action that can adversely affect water quality in surface water or groundwater:

- > Must be consistent with the maximum benefit to the people of the state.
- > Must not unreasonably affect present and anticipated beneficial use of such water.
- > Must not result in water quality less than that prescribed in water quality plans and policies.

9.1.2.2.3 Safe Drinking Water Act 1976

California adopted its own Safe Drinking Water Act in 1976 that gave California Department of Health Services the responsibility for the administration of the federal Safe Drinking Water Act in California. This responsibility was then moved to the CDPH. The first approach is to safeguard public welfare by limiting the level of specific contaminants that can impact public health. These limits are identified as Primary MCLs and are specific concentrations that cannot be exceeded for a given constituent. The second approach is a treatment technique that is based on distribution system sampling in comparison to an action level. If the action level is exceeded in more than 10 percent of the samples, then additional treatment is required of the water supplier. Currently, treatment technique limits apply only to copper and lead. CDPH also has established Secondary MCLs that regulate constituents that affect water quality aesthetics (such as taste, odor, or color). Generally, CDPH uses the Secondary MCLs as guidelines.

Another component of the California Safe Drinking Water Act is the requirement of Cal-EPA's Office of Environmental Health Hazard Assessment to develop PHGs for contaminants in California's publicly supplied drinking water. PHGs are concentrations of drinking water contaminants that pose no significant health risk if consumed for a lifetime, based on current risk assessment principles, practices, and methods. This office establishes PHGs pursuant to Health & Safety Code Section 116365 for contaminants with MCLs and for those for which CDPH will be adopting minimum detection limits. Public water systems use PHGs to provide information about drinking water contaminants in their annual Consumer Confidence Reports. Certain public water systems must provide a report to their customers about health risks from a contaminant that exceeds its PHG and about the cost of treatment to meet the PHG, and hold a public hearing on the report.

9.1.2.2.4 Water Quality Control Plan

The Water Quality Control Plans (or Basin Plans) of all nine of the RWQCBs and the California Ocean Plan (prepared and implemented by the SWRCB) collectively constitute the State Water Quality Control Plan. These plans are the RWQCB's master water quality control planning documents. They designate beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and also include programs of implementation to achieve water quality objectives. According to the requirements of the CWA and the California Porter-Cologne Act, each Basin Plan has been designed to support the intentions of the CWA and the Porter-Cologne Act by (1) characterizing the water resources within a region, (2) identifying beneficial uses that exist or have the potential to exist in each waterbody, (3) establishing water quality objectives for each waterbody to protect beneficial uses or allow their restoration, and (4) providing an implementation program that achieves water quality objectives. Implementation program measures include monitoring, permitting, and enforcement activities. The Basin Plans include numeric site-specific water quality objectives and narrative objectives for toxicity, chemical constituents, and tastes and odors. The narrative toxicity objective states: "*All waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life.*"

9.1.2.2.5 Diazinon and Pesticide-Related Toxicity in Urban Creeks TMDL

Resolution R2-2005-0063 amended the Basin Plan for the San Francisco Bay region to establish a Water Quality Attainment Strategy and TMDL for diazinon and pesticide-related toxicity in the Bay Area region creeks. As diazinon use was phased out in 2004, alternatives began to pose water quality concerns and pyrethroids in particular were identified as the likely cause of sediment toxicity in some Bay Area urban creeks. To account for pesticide use changes over time, the Basin Plan amendment includes generic

pesticide-related toxicity targets to comply with the narrative toxicity objective. When pesticide-related toxicity occurs in urban creek water, creeks do not meet the narrative toxicity objective as stated above in *Water Quality Control Plan*. When pesticide-related toxicity occurs in sediment, the creeks also do not meet the narrative sediment objective, which states: “Controllable water quality factors shall not cause a detrimental increase in the concentrations of toxic pollutants in sediments or aquatic life.” Management actions designed to reduce the impacts of pesticide-related toxicity are outlined within the TMDL and Water Quality Attainment Strategy and are currently underway via Provision C.9 of the Municipal Regional NPDES Permit (BASMAA 2013).

9.1.2.2.6 California Pesticide Regulatory Program

CDPR regulates the sale and use of pesticides in California. CDPR is responsible for reviewing the toxic effects of pesticide formulations and determining whether a pesticide is suitable for use in California through a registration process. Although CDPR cannot require manufacturers to make changes in labels, it can refuse to register products in California unless manufacturers address unmitigated hazards by amending the pesticide label. Consequently, many pesticide labels that are already approved by USEPA also contain California-specific requirements. Pesticide labels are application requirements and include instructions informing users how to make sure the product is applied only to target pests including precautions the applicator should take to protect human health and the environment. For example, product labels may contain such measures as restrictions in applications to certain land uses and weather (i.e., wind speed) parameters.

9.1.2.2.7 Cooperative Agreement between the California Department of Public Health and Local Vector Control Agencies

Due to their public health mission, CDPR’s Pesticide Regulatory Program provides special procedures for vector control agencies that operate under a Cooperative Agreement with CDPH. The application of pesticides by vector control agencies is regulated by a special and unique arrangement among the CDPH, CDPR, and County Agricultural Commissioners. CDPR does not directly regulate vector control agencies. CDPH provides regulatory oversight for vector control agencies that are signatory to the Cooperative Agreement. Signatories to the agreement use only pesticides listed by CDPH, maintain pesticide use reports, and ensure that pesticide use does not result in harmful residues on agricultural products. Both CDPH and County Agricultural Commissioners inspect District facilities, training and safety practices documents, staff certifications, continuing education compliance records, and equipment. County Agricultural Commissioners also conduct unannounced field inspections of staff and equipment to document compliance with product label requirements, as well as other regulations and safety practices.

9.1.2.2.8 Pesticide Permits

In response to a Sixth Circuit Court decision in 2009 that the application of pesticides at, near, or over waters of the US that results in discharges of pollutants requires coverage under a NPDES permit, the SWRCB adopted four Pesticide Permits. The following two are applicable to the Program. The Spray Applications Permit is also relevant to the regulatory setting when the District performs pesticide applications for the CDFA and/or USFS.

- > Statewide NPDES Vector Control Permit. The Statewide NPDES Permit for Biological and Residual Pesticide Discharges to waters of the US from Vector Control Applications (SWRCB Water Quality Order No. 2011-0002-DWQ with amendments; NPDES No. CAG 990004; Vector Control Permit) covers the point source discharge of biological and residual pesticides resulting from direct and spray applications for vector control. The District completed application requirements, including preparation of a Pesticide Application Plan (PAP) and public notice requirements, and received permit approval on October 31, 2011. Permitted larvicide active ingredients include monomolecular films, methoprene, *Bacillus thuringiensis* subspecies *israelensis* or Bti, *Bacillus sphaericus* or Bs, temephos, petroleum distillates, and spinosad. Permitted adulticide active ingredients include malathion, naled, pyrethrin,

deltamethrin, lambda-cyhalothrin, permethrin, resmethrin, sumithrin, prallethrin, the synergist PBO, etofenprox, and N-octyl bicycloheptene dicarboximide (MGK-264). The permit also includes language that allows adulticides and larvicides that are newly registered in California and that are based on active ingredients currently registered by CDPR to be used for vector control without having to further amend the permit. The permit contains a receiving water limitation for malathion and receiving water monitoring triggers for the other active ingredients. To obtain coverage under the permit, each discharger (typically a vector control district) must submit a Notice of Intent, application fee, and PAP, which is subject to approval by the SWRCB following a 30-day public comment period.

The PAP serves as a comprehensive plan developed by the discharger that describes the project, the need for the project, what will be done to reduce water quality impacts, and how those impacts will be monitored. The PAP must include a description of application and target areas, evaluation of available BMPs, and description of BMPs to be implemented. The PAP must include a discussion of the factors influencing the decision to select pesticide applications for vector control, what pesticide products or types expected to be used, and any known degradation by-products. The PAP also includes the methodology used to determine how much pesticide is needed and how this amount was determined, the methods in which pesticides are to be applied, and any adjuvants or surfactants that will be used.

Permittees must comply with the Vector Control Permit Monitoring and Reporting Program (MRP). Visual monitoring may be required during and after pesticide applications, when safe and feasible, to visually assess the area in and around where pesticides are applied for possible and observable adverse incidents. Monitoring of application rates is also required. Adverse incidents must be reported to the RWQCB within 24 hours of identification. Within 30 days a written report must be submitted, which includes a description of actions to be taken to prevent recurrence of adverse incidents. The District submits annual reports that include a description of the type of pesticide used, the quantity used, the location of where the pesticide is used, submittal of documentation such as the Pesticide Application Logs, and review of their PAP.

- > Statewide NPDES Aquatic Weed Control Permit. The Statewide General NPDES Permit for Residual Aquatic Pesticide Discharges to Waters of the US from Algae and Aquatic Weed Control Applications (SWRCB Water Quality Order No. 2013-0002-DWQ with amendments; NPDES No. CAG 990005; Aquatic Weed Control Permit) addresses the discharge of residues resulting from pesticide applications using products containing 2,4-D, acrolein, copper, diquat, endothall, fluridone, glyphosate, imazamox, imazapyr, penoxsulam, sodium carbonate peroxyhydrate, triclopyr-based algicides and aquatic herbicides, and adjuvants containing ingredients represented by nonylphenol. The permit contains receiving water limitations for 2,4-D, acrolein, copper, diquat, endothall, fluridone, glyphosate, nonylphenol, toxicity, and dissolved oxygen. The permit also includes receiving water monitoring triggers for imazapyr and triclopyr triethylamine. To obtain coverage under the permit, a discharger must submit a Notice of Intent, application fee, and a vicinity map to the appropriate RWQCB. Effluent limitations contained in the Aquatic Weed Control Permit require that the discharge of residual algicides and aquatic herbicides meet applicable water quality standards, require implementation of BMPs, and include requirements to develop and implement an APAP.

The APAP must describe appropriate BMPs, including compliance with all pesticide label instructions, and a monitoring plan that meets the requirements of the permit MRP. Monitoring requirements include background, event, and post-event sampling for visual, physical, and chemical constituents for each type of aquatic pesticide used for each type of site (flowing water and nonflowing water). Annual reports must summarize monitoring data and address the effectiveness of the APAP to reduce or prevent the discharge of pollutants associated with aquatic pesticide applications. Other specific requirements of the APAP include a description of the waterbody(ies) or waterbody systems being controlled and a description of what weed(s) are being controlled and why. The APAP also serves as a discussion of control tolerances (i.e., how much growth can occur before action is necessary) and of the factors influencing the decision to use aquatic pesticides in regards to those tolerances (pros and

cons). The types of pesticides and adjuvants that are used and the methodology used to determine the amount of product to be applied are also detailed within an APAP. Finally, the APAP should have a description of application and treatment areas within the system and, if applicable, a list of gates or control structures and their inspection schedule to ensure they are not leaking.

- > Statewide NPDES Spray Applications Permit. The Statewide General NPDES Permit for Biological and Residual Pesticide Discharges to Waters of the US from Spray Applications (SWRCB Water Quality Order No. 2011-0004-DWQ; NPDES No. CAG 990007; Spray Applications Permit) addresses spray applications of insecticides and herbicides by CDFA and USFS. Under the permit, CDFA is covered for applications of acetamiprid, aminopyralid, *Bacillus thuringiensis*, subspecies *kurstaki* (*Btk*), carbaryl, chlorsulfuron, clopyralid, cyfluthrin, dinotefuran, glyphosate, imazapyr, imidacloprid, malathion, naled, nuclear polyhedrosis virus (NPV), pheromone, pyrethrins, spinosad A and D, triclopyr butoxyethyl ester (BEE), and triclopyr triethylamine salt (TEA). USFS is covered for applications of biological control agents, which is a subset of the CDFA active ingredients.

The permit contains a receiving water limitation for malathion and receiving water monitoring triggers for many of the other active ingredients. To obtain coverage under the permit, the discharger must submit a Notice of Intent, application fee, and a project- or program-specific PAP to the SWRCB. The PAP must describe the application area, appropriate BMPs for each pesticide project, an evaluation of possible alternatives to pesticide use, and a monitoring plan. The PAP must also include an Off-Target Drift Management Plan. Monitoring requirements include background and event monitoring for visual, physical, and chemical parameters at frequencies similar to the Vector Control Permit. Annual reports must summarize sampling results and recommend improvements to the monitoring program, BMPs, and PAP.

9.1.2.3 Local

A compilation of local ordinances and regulations (or chapters within which they can be found) for counties within the District’s Service Area and two adjacent counties in its Program Area is provided in Table 9-2. The counties are Marin, Napa, Solano, and Sonoma counties.

Table 9-2 List of County General Plan Pesticide and Water Quality Policies

County	Name of Code/Plan	Element Title, Chapter and Section
Marin	Marin Countywide Plan	Natural Systems and Agriculture Element, Policy OS-1.c, WR-2.1, WR-2.a, WR-2.j, WR-2.k, WR-2.n,
Napa	Napa County General Plan	Conservation Element, Chapter 10, Policy CON-2e, Policy CON-2f, CON-26, CON-42, CON-47, CON-49, Recreation and Open Space Policy ROS-3
Solano	Solano County General Plan	Health and Safety Element, HS.1-58
Sonoma	Sonoma County General Plan	Land Use Element, Policy LU-11d, Public Safety Element, Policy PS-4n, Policy PS-4, Water Resources WR-3d

Sources: Marin County 2007; Napa County 2009; Solano County 2008; Sonoma County 2009

9.1.2.3.1 County Agricultural Commissioners

In addition to federal and state oversight, County Agricultural Commissioners in California also regulate the sale and use of pesticides and issue Use Permits for applications of pesticides that are deemed as restricted materials by CDPR. County Agricultural Commissioners collect pesticide use reports from the District and other users of pesticides, investigate incidents and illnesses, and conduct annual inspections. County Agricultural Commissioners also conduct unannounced field inspections of staff and equipment to document compliance with product label requirements, as well as other regulations and safety practices.

9.2 Environmental Impacts and Mitigation Measures

The water resource impacts evaluation is provided below. The evaluation qualitatively and quantitatively compares the Program's potential water resource impacts to the significance criteria presented in Section 9.2.1, Evaluation Concerns and Criteria.

9.2.1 Evaluation Concerns and Criteria

Impacts are considered significant if the Program actions cause concentrations of Program compounds in receiving waterbodies (surface water or groundwater) to exceed established water quality objectives or other applicable water quality standards or promulgated regulations on the local, state, or federal level. Increased concentrations of potential pollutants associated with Program activities within the Program Area would be related to the application of Program materials or implementation of Program activities in the Program Area.

As discussed previously in this PEIR, the Program Area is distributed across the District (and adjacent counties) rather than in a single particular location. The effects on water resources are largely attributable to the post-application movement of those compounds identified for use under the Program alternatives to surface water and/or groundwater. Some Program activities that do not involve applications of compounds could also affect water resources.

Concerns related to water resources issues that were raised during public scoping included the following:

- > Consideration of CDPH review and approval of mosquito abatement materials and practices proposed for use on watershed lands
- > Integration of "Source Reduction" strategies with Stream Maintenance Program approaches in Water Agency-owned flood control channels. (Sonoma County Water Agency)
- > Need for description and quantification of dredge or fill activities and evaluation of their impacts
- > Impacts of drift from aerial and ground applications on waterbodies, watersheds, and drinking water supplies
- > Concern for spread of invasive weeds, erosion, and sedimentation
- > Concern about the use of mosquito larvicides and adulticides in or associated with septic tank (onsite wastewater treatment systems) and the potential to impact surface or groundwater resources

While the first two issues are related to Program implementation and coordination with other agencies (who will receive this PEIR), the last three are related to the Physical Control, Vegetation Management, and Chemical Control Alternatives and are addressed in the environmental impact analyses with one exception. This water resource analysis addresses potential impacts to the quality of surface water and groundwater at a programmatic level and does not quantify dredge and fill activities (which could be addressed in the new USACE permit described in Section 2.8.1.3). Because no large-scale consumptive use of water supply is associated with implementation of the Program alternatives, the potential for an impact to water supply would be related to a physical impact to water quality. Additional discussion of the potential for Program pesticides to result in water quality impacts that could affect nontarget ecological receptors is contained in Section 6.2, Ecological Health Environmental Impacts.

9.2.1.1 *Thresholds of Significance*

Applicable regulatory and planning standards discussed above can be used to determine appropriate thresholds of significance for this water resource analysis.

The Program activities are evaluated in accordance with the Hydrology and Water Quality Section IX of the CEQA Environmental Checklist Form, Appendix G. Several of the topic areas represented by the questions from the checklist are not affected by the Program activities, as follows:

<i>Would the Program substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</i>	No, Program activities would not impact groundwater supplies or groundwater recharge.
<i>Would the Program substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off site?</i>	No, Program activities would not substantially change or alter drainage amount, timing, or patterns. Drainage channels are maintained to improve water circulation to avoid breeding areas for mosquitoes.
<i>Would the Program substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off site?</i>	No, Program activities would not substantially change or alter drainage amount, timing, or patterns. Drainage channels are maintained to improve water circulation to avoid breeding areas for mosquitoes.
<i>Would the Program create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</i>	No, Program activities would not create or contribute additional sources of clean or polluted runoff.
<i>Would the Program place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</i>	No, Program activities would not construct any housing.
<i>Would the Program place within a 100-year flood hazard area structures, which would impede or redirect flood flows?</i>	No, Program activities would not create any structures.
<i>Would the Program expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</i>	No, Program activities would not expose people or structures to flooding.
<i>Would the Program lead to inundation by seiche, tsunami, or mudflow?</i>	No, Program activities would not cause inundation by seiche, tsunami, or mudflow.

Topic areas that may be impacted by the Proposed Program include the following:

- > Would the Program violate any water quality standards or waste discharge requirements?
- > Would the Program otherwise substantially degrade water quality?

For the evaluation of these topic areas, impacts from Program activities on the water quality of surface water or groundwater would be considered potentially significant if the Program implementation or activities could cause chemical concentrations to exceed the following criteria:

- > Any discharge to the surface water or groundwater that exceeds NPDES permit receiving water limitations
- > Any discharge to the surface water or groundwater that exceeds Basin Plan objectives with a focus on the toxicity objective
- > Any discharge to the surface water or groundwater that exceeds the MCLs

- > Any discharge to surface water or groundwater that exceeds the California Toxics Rule Criteria Maximum Concentrations for human health or for aquatic life
- > Any discharge to surface water or groundwater that degrades the water quality either by affecting beneficial uses or by exceeding any prescribed concentration limits in state water quality plans and policies.

9.2.2 Evaluation Methods and Assumptions

The methodology and assumptions of this water resources impact evaluation for the Program alternatives are provided below.

9.2.2.1 *Methodology*

The methodology used to prepare this programmatic impact analysis section is as follows:

- > Obtain source-specific data for Program-specific chemical constituents.
- > Evaluate Ecological and Human Health Risk Assessment (Appendix B) sections related to the District's Program.
- > Compare water quality conditions associated with Program alternatives against water quality threshold criteria.
- > Identify water resource impacts and mitigation measures for Program activities that exceed water quality thresholds.

The *Ecological and Human Health Risk Assessment* (Appendix B) reviews and evaluates the pesticide (insecticides and herbicides) active ingredients and adjuvants the District currently uses or proposes to use. Application information, including the target organisms, number of treatments, total amount applied, and specific habitat types was obtained from the District. A comprehensive literature review was conducted to evaluate environmental fate and general toxicity characteristics for the active ingredients. The results of the assessment were used to rank the potential for adverse effects to human health and the environment. Chemical and application characteristics such as the likelihood for nontarget species and habitats to be affected, the potential for drift, and the possible transport and fate of the chemical in various media (i.e., air, surface water/groundwater, soil) were considered in the assessment. Those active ingredients that appear to exhibit a higher level of risk than others or that are (or could be) in prevalent use in the District's Program (even though they had lower toxicity) include the following products:

- > Methoprene for mosquito control (toxicity to aquatic organisms and insects)
- > Etofenprox for mosquito control (toxicity to aquatic organisms)
- > Bti for mosquito control (prevalent use; public concerns)
- > Pyrethrins for mosquito control (prevalent use; includes PBO synergist)
- > Resmethrin for mosquito control (prevalent use; includes PBO synergist)
- > Vegetable oil (coconut oil)/mix for mosquito control (contains low percentage petroleum distillate)
- > Permethrin for mosquito and wasp control (toxicity to aquatic organisms; potential endocrine disruptor)
- > Alkylphenol ethoxylates (APEs) for vegetation control (high toxicity to aquatic organisms; moderately bioaccumulative)
- > Glyphosate for general vegetation control (prevalent use; possible endocrine disruptor)

The District is using the following BMPs as control measures to avoid and minimize impacts to water resources (Table 9-3 below; a subset of practices in Table 2-6 in Chapter 2).

Table 9-3 MSMVCD BMPs to Avoid/Minimize Environmental Impacts to Water Resources

Best Management Practice (BMP)
A. General BMPs
1. District staff has had long standing and continues to have cooperative, collaborative relationships with federal, state, and local agencies. The District regularly communicates with agencies regarding the District's operations and/or the necessity and opportunity for increased access for surveillance, source reduction, habitat enhancement, and the presence of special-status species and wildlife. The District often participates in and contributes to interagency projects. The District will continue to foster these relationships, communication, and collaboration.
3. When walking or using small equipment in marshes, riparian corridors, or other sensitive habitats, existing trails, levees and access roads will be used whenever possible to minimize or avoid impacts to species of concern and sensitive habitats. Specific care will be taken when walking and performing surveillance in the vicinity of natural and man-made ditches or sloughs or in the vicinity of tidal marsh habitat.
10. Properly train all staff, contractors, and volunteer help to prevent spreading weeds and pests to other sites. The District headquarters contains wash rack facilities (including high-pressure washers) to regularly (in many cases daily) and thoroughly clean equipment to prevent the spread of weeds.
B. Tidal Marsh-Specific BMPs
1. District will minimize the use of equipment (e.g., ARGOs) in tidal marshes and wetlands. When feasible and appropriate, surveillance and control work will be performed on-foot with handheld equipment. Aerial treatment (helicopter and fixed-wing) treatments will be used when feasible and appropriate to minimize the disturbance of the marsh during pesticide applications. When ATVs (e.g., ARGOs) are used, techniques will be employed that limit impacts to the marsh including: slow speeds; slow, several point turns; using existing levees or upland to travel through sites when possible; use existing pathways or limit the number of travel pathways used.
3. District will minimize travel along tidal channels and sloughs to reduce impacts to vegetation used as habitat (e.g., Ridgway's rail nesting and escape habitat).
5. When feasible, boats will be used to access marsh areas for surveillance and treatment of vectors to further reduce the risk of potential impacts that may occur when using ATVs to conduct vector management activities.
F. Vegetation Management
1. Consultations will be made with the appropriate resource agency to discuss proposed vegetation management work, determine potential presence of sensitive species and areas of concern, and any required permits.
2. Vegetation management work performed will typically be by hand, using handheld tools, to provide access to vector habitat for surveillance, and when needed control activities. Tools used include machetes, small garden-variety chainsaw, hedge trimmers, and "weed-eaters."
3. District will consult and coordinate with resource agencies as well as have all necessary permits prior to the commencement of work using heavy equipment (e.g., larger than handheld/garden variety tools such as small excavators with rotary mowers) in riparian areas.
4. Minor trimming of vegetation (e.g., willow branches approximately 3 inches in diameter or less, blackberry bushes, and poison oak) to the minimum extent necessary will occur to maintain existing paths or create access points through dense riparian vegetation into vector habitat. This procedure may include minor trimming of overhanging limbs, brush and blackberry thickets that obstruct the ability to walk within creek channels. Paths to be maintained will not be a cut, defined corridor but rather a path maintained by selective trimming of overhanging or intrusive vegetation. Paths to be maintained will range in width from 3 to 6 feet across.

Best Management Practice (BMP)	
5.	Downed trees and large limbs that have fallen due to storm events or disease will be cut only to the extent necessary to maintain existing access points or to allow access to vector habitats.
7.	Every effort will be made to complete vegetation management in riparian corridors prior to the onset of heavy rains. Maintenance work to be done in early spring will be limited to trimming new tree shoot growth, poison oak, blackberries, and downed trees that block these paths.
9.	Within suitable habitat for California freshwater shrimp (<i>Syncaris pacifica</i>), no in-channel vegetation will be removed, trimmed, or otherwise disturbed. District staff will work with resource agencies to determine locations of suitable habitat for California freshwater shrimp and receive written authorization to proceed prior to commencement of vegetation management activities.
10.	If suitable habitat necessary for special- status species is found, including vernal pools, and if nonchemical physical and vegetation management control methods have the potential for affecting special- status species, then the District will coordinate with the CDFW, USFWS, and/or NMFS before conducting control activities within this boundary or cancel activities in this area. If the District determines no suitable habitat is present, control activities may occur without further agency consultations.
11.	When using heavy equipment for vegetation management, District staff (and contractors) will minimize the area that is affected by the activity and employ all appropriate measures to minimize and contain turbidity. Heavy equipment will not be operated in the water and appropriate containment and cleanup systems will be in place on site to avoid, contain, and clean up any leakage of toxic chemicals.
G. Maintenance / Construction and Repair of Tide Gates and Water Structures in Waters of the US	
1.	District staff will consult with appropriate resource agencies (USACE, USFWS, CDFW, NMFS, BCDC, RWQCB) and obtain all required permits prior to the commencement of ditch maintenance or construction within tidal marshes.
5.	Staging of equipment will occur on upland sites.
6.	Mats or other measures will be taken to minimize soil disturbance (e.g., use of low ground pressure equipment) when heavy equipment is used.
7.	All projects will be evaluated prior to bringing mechanical equipment on site, to identify and flag sensitive sites, select the best access route to the work site consistent with protection of sensitive areas, and clearly demarcate work areas.
8.	Measures will be taken to minimize impacts from mechanical equipment, such as hand ditching as much as possible; reducing turns by track-type vehicles, taking a minimum number of passes with equipment, varying points of entry, driving vehicles at low speed, and not driving on open mud and other soft areas.
9.	Discharges of dredged or fill material into tidal waters will be minimized or avoided to the maximum extent possible at the project site and will be consistent with all permit requirements for such activity. No discharge of unsuitable material (e.g., trash) will be made into waters of the US, and material that is discharged must be free of toxic pollutants in toxic amounts (see CWA Section 307). Measures will be taken to avoid disruption of the natural drainage patterns in wetland areas.
11.	Ditching that drains high marsh ponds will be minimized to the extent possible to protect the habitat of native salt pan species.
12.	No spoils sidecast adjacent to circulation ditches will exceed 8 inches above the marsh plain to minimize risk of colonization of spoils by invasive, nonnative plants and/or the spoils lines from becoming access corridors for unwanted predators (e.g., dogs, cats, red fox). Sidecast spoil lines exceeding 4 inches in height above the marsh plain will extend no more than 6 feet from the nearest ditch margin. Any spoils in excess of these dimensions will be hydraulically redispersed on site (e.g., by rotary ditcher), or removed to designated upland sites (per conditions of resource agency issued permits). Sidecast spoil lines will be breached at appropriate intervals to prevent local impediments to water circulation.

Best Management Practice (BMP)
14. Small ditch maintenance work will be performed by hand, whenever possible, using handheld shovels, pitch forks, etc., and small trimmers such as "weed-eaters." (Note: the majority of small ditch work the District performs is by hand.)
15. Work will be done at low tide (for tidal areas) and times of entry will be planned to minimize disruption to wildlife.
16. In marshes that contain populations of invasive nonnative vegetation such as pepperweed or introduced spartina, sidecast spoils will be surveyed for the frequency of establishment of these species during the first growing season following deposition of the spoils. The results of the surveys will be reported to the USACE, USFWS, and CDFW. If it is determined the sidecasting of spoils resulted in a substantial increase in the distribution or abundance of the nonnative vegetation, which is detrimental to the marsh, the District will implement appropriate abatement measures after consultation with the USACE, USFWS, and CDFW.
17. When possible (i.e., with existing labor and vehicles), refuse such as tires, plastic, and man-made containers found at the work site will be removed and properly discarded.
H. Applications of Pesticides, Surfactants, and/or Herbicides
1. District staff will conduct applications with strict adherence to product label directions that include approved application rates and methods, storage, transportation, mixing, and container disposal.
2. District will avoid use of surfactants when possible in sites with aquatic nontargets or natural enemies of mosquitoes present such as nymphal damselflies and dragonflies, dytiscids, hydrophilids, corixids, notonectids, and ephyrids. Surfactants are the only tool that can be used with pupae to prevent adult mosquito emergence. The District will use a microbial larvicide (Bti, Bs), insect growth regulator (e.g., methoprene) instead, or another alternative when possible.
3. Materials will be applied at the lowest effective concentration for a specific set of vectors and environmental conditions. Application rates will never exceed the maximum label application rate.
4. To minimize application of pesticides, application of pesticides will be informed by surveillance and monitoring of vector populations.
5. District staff will follow label requirements for storage, loading, and mixing of pesticides and herbicides. Handle all mixing and transferring of pesticides and herbicides within a contained area.
6. Postpone or cease application when predetermined weather parameters exceed product label specifications, when wind speeds exceed the velocity as stated on the product label, or when a high chance of rain is predicted and rain is determining factor on the label of the material to be applied.
7. Applicators will remain aware of wind conditions prior to and during application events to minimize any possible unwanted drift to waterbodies, and other areas adjacent to the application areas.
8. Spray nozzles will be adjusted to produce larger droplet size rather than smaller droplet size. Use low nozzle pressures where possible (e.g., 30 to 70 pounds per square inch). Keep spray nozzles within a predetermined maximum distance of target weeds (e.g., within 24 inches of vegetation for hand application) or vectors. Adjusting droplet size would only apply to larvicides, herbicides, and non-ULV applications. Use ULV applications that are calibrated to be effective and environmentally compatible at the proper droplet size (about 10 to 30 microns).
9. Clean containers at an approved site and dispose of at a legal dumpsite or recycle in accordance with manufacturer's instructions if available.
10. Special-Status Aquatic Wildlife Species: <ul style="list-style-type: none"> – A CNDDDB search was conducted in 2012 and the results incorporated into Appendix A for this PEIR. An update was completed in November 2014 and the results incorporated into Section 4.1.2 of this PEIR. District staff communicates with state, federal, and county agencies regarding sites that have potential to support special-status species. Staff have visited many sites where the District performs surveillance and control work for many years and staff are highly knowledgeable about the sites and habitat present. If new sites or site features are discovered that have potential to be habitat for special-status species, the appropriate agency and/or landowner is contacted and communication initiated.

Best Management Practice (BMP)	
	<ul style="list-style-type: none"> – Use only pesticides, herbicides, and adjuvants approved for aquatic areas or manual treatments within a predetermined distance from aquatic features (e.g., within 15 feet of aquatic features). Aquatic features are defined as any natural or man-made lake, pond, river, creek, drainage way, ditch, spring, saturated soils, or similar feature that holds water at the time of treatment or typically becomes inundated during winter rains. – If suitable habitat for special-status species is found, including vernal pools, and if aquatic-approved pesticide, herbicide, and adjuvant treatment methods have the potential for affecting the potential species, then the District will coordinate with the CDFW, USFWS, and/or NMFS before conducting treatment activities within this boundary or cancel activities in this area. If the District determines no suitable habitat is present, treatment activities may occur without further agency consultation.
11.	District staff will monitor sites post-treatment to determine if the target vector or weeds were effectively controlled with minimum effect to the environment and nontarget organisms. This information will be used to help design future treatment methods in the same season or future years to respond to changes in site conditions.
12.	Do not apply pesticides that could affect insect pollinators in liquid or spray/fog forms over large areas (more than 0.25 acre) during the day when honeybees are present and active or when other pollinators are active. Preferred applications of these specific pesticides are to occur in areas with little or no honeybees or pollinator activity or after dark. These treatments may be applied over smaller areas (with handheld equipment), but the technician will first inspect the area for the presence of bees and other pollinators. If pollinators are present in substantial numbers, the treatment will be made at an alternative time when these pollinators are inactive or absent.
13.	The District will provide notification to the public (24 to 48 hours in advance if possible) and/or appropriate agency(ies) when applying pesticides or herbicides for large-scale treatments that will occur in close proximity to homes, heavily populated, high traffic, and sensitive areas. The District infrequently applies or participates in the application of herbicides in areas other than District facilities.
I. Hazardous Materials and Spill Management	
1.	Exercise adequate caution to prevent spillage of pesticides during storage, transportation, mixing, or application of pesticides. Report all pesticide spills and cleanups (excepting cases where dry materials may be returned to the container or application equipment).
2.	Maintain a pesticide spill cleanup kit and proper protective equipment at the District's Service Yard and in each District truck used for pesticide transport.
3.	Manage the spill site to prevent entry by unauthorized personnel. Contain and control the spill by stopping it from leaking or spreading to surrounding areas. Cover dry spills with polyethylene or plastic tarpaulin, and absorb liquid spills with appropriate absorbent materials.
4.	Properly secure the spilled material, label the bags with service container labels identifying the pesticide, and deliver them to a District/Field Supervisor for disposal.
5.	A hazardous spill plan will be developed, maintained, made available, and staff trained on implementation and notification for petroleum-based or other chemical-based materials prior to commencement of vector treatment activities.
6.	Field-based mixing and loading operations will occur in such a manner as to minimize the risk of accidental spill or release of pesticides.

9.2.2.2 Assumptions

The following assumptions were used in the assessment of potential water resource impacts from the Program alternatives:

- > Site-specific evaluation of water quality impacts are not within the scope of this programmatic evaluation.
- > The programmatic evaluation is based on the current proposed mosquito and/or vector control methods and is subject to change.
- > Existing baseline ambient water quality data related to Program chemicals are limited for most areas.
- > Mitigation measures for specific locations within the Program Area are not provided. The BMPs listed above will be implemented by the District as needed throughout the District's Service Area.

Assumptions related to the analysis of hazards, toxicity, and exposure for chemical treatment methods are explained below, including the definition of key terms.

9.2.2.2.1 Hazardous Material

A "hazardous material" is defined in California Health and Safety Code Section 25501 (p): as "any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, "hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment." Any liquid, solid, gas, sludge, synthetic product, or commodity that exhibits characteristics of toxicity, ignitability, corrosiveness, or reactivity has the potential to be considered a "hazardous material."

9.2.2.3 Toxicity and Exposure

Toxicology is the study of a compound's potential to elicit an adverse effect in an organism. The toxicity of a compound is dependent upon exposure, including the specific amount of the compound that reaches an organism's tissues (i.e., the dose), the duration of time over which a dose is received, the potency of the chemical for eliciting a toxic effect (i.e., the response), and the sensitivity of the organism receiving the dose of the chemical. Toxicity effects are measured in controlled laboratory tests on a dose/response scale, whereby the probability of a toxic response increases as dose increases. Exposure to a compound is necessary for potential toxic effects to occur. However, exposure does not, in itself, imply that toxicity will occur. Thus, toxic hazards can be mitigated by limiting potential exposure to ensure that doses are less than the amount that may result in adverse health effects.

The toxicity data included in the numerous tables and charts in this document are generally derived from rigidly controlled laboratory animal studies designed to determine the potential adverse effects of the chemical under several possible routes of exposure. In these studies, the species of interest is exposed to 100 percent chemical at several doses to determine useful information such as the lowest concentration resulting in a predetermined adverse effect (LOAEL) on numerous selected physiological and behavioral systems. The second component of these tests is to determine the highest concentration of chemical that results in no measurable adverse effect (NOAEL).

However, these and other coordinated and focused laboratory tests are designed to document the effects of the chemical using a continuous, controlled laboratory exposure that does not realistically reflect the likely patchy exposures typical of the District field application scenarios. As such, the toxicity information generated using laboratory tests (and some limited field tests) are intended as an overview of potential issues that might be associated with maximum direct exposures. This information is used to develop and recommend guidance for use that should provide maximum exposure levels of applications that are

protective of ecological health. These guidelines include numerous “safety margins” in the toxicity calculations that are intended to provide adequate efficacy to target organisms while not adversely impacting humans or nontarget plant and animal species. In some instances, the regulatory guidance may include additional suggestions for protective application to assure no significant impact on nontarget species and humans.

Although the regulatory community uses this basic information to provide a relative comparison of the potential for a chemical to result in unwanted adverse effects and this information is reflected in the approved usage labels and material safety data sheets (MSDSs),¹ in actual practice, the amounts applied in the District’s Program Area are substantially less than the amounts used in the toxicity studies.

Because of the large safety factors used to develop recommended product label application rates, the amount of chemical resulting in demonstrated toxicity in the laboratory is much higher than the low exposure levels associated with an actual application for vector control. The application concentrations consistent with the labels or MSDSs are designed to be protective of the health of humans and other nontarget species (i.e., low enough to not kill them, weaken them, or cause them to fail to reproduce). Although numerous precautions (BMPs) and use of recommended application guidance is intended to provide efficacy without adverse effects to nontarget organisms, misapplication or unexpected weather conditions may still result in effects on some nontarget organisms in the exposure area (see Section 6.2 for analysis of these potential impacts) . This potential impact is ameliorated by careful use of BMPs and advance planning by the District.

Although laboratory toxicity testing focuses on tiered concentrations of chemical exposure, the results of these tests produce a series of toxicity estimates of concentrations less than those that produce mortality. Extrapolation of these data is used to generate estimates of chronic toxicity or possible effects of lower doses that may result in sublethal effects such as reproduction or metabolic changes. In reality, these low-dose exposures need to be sustained over longer periods than are relevant to typical application scenarios for vector control including multiple applications in an area such as a wetland.

9.2.3 Surveillance Alternative

Surveillance activities involve monitoring the abundance of adult and larval mosquitoes, field inspection of mosquito habitat, testing for the presence of encephalitis virus-specific antibodies in sentinel chickens or wild birds, collection and testing of ticks, small rodent trapping and testing, and/or response to public service requests regarding other animal or insect vectors. Mosquito populations are monitored through the use of traps, inspections, and sampling in mosquito habitats. Known and suspected habitats are anywhere that water can collect, be stored, or remain standing for more than a few days, including, but not limited to, catch basins, stormwater detention systems, residential communities, parks, ornamental ponds, unmaintained swimming pools, seeps, seasonal wetlands, tidal and diked marshes, wastewater ponds, malfunctioning septic (onsite wastewater treatment) systems, sewer plants, winery waste/agricultural ponds, managed waterfowl ponds, canals, creeks, tree holes, and flooded basements. Inspection of a septic system as a source of mosquito production is typically performed in response to a request for service from property owners. Indirect surveillance for mosquitoes associated with septic tanks and leach fields is conducted by setting adult mosquito traps on individual properties or within neighborhoods. Ticks and rodents are collected along trails and sampled for disease. Rodents may be collected during building inspections or ongoing service requests.

The potential for increased soil erosion during surveillance activities would be minimal. Existing trails, levees, and access roads will be used whenever possible when walking or using small equipment in marshes or other sensitive habitats (BMP A3). Boats would also be used to access marsh areas during

¹ Although the MSDS format is referenced in this document, note that under the international Globally Harmonized System, the MSDS format has been substantially revised and is now largely replaced by standardized Safety Data Sheets (SDSs).

surveillance (BMP B5). If preexisting roads and trails are not available, low ground pressure ATVs may be used to access sites. Offroad access is minimized and used only when roads and trails are not available.

Impact WR-1: The Surveillance Alternative would not result in increased soil erosion, so the impact to surface water would be **less than significant**. No mitigation is required.

Surveillance activities do not involve chemical applications to water or soil and require very little interaction with waterbodies to collect samples. With the exception of some adult mosquito traps, pesticides are not required for any of the surveillance techniques. Some adult mosquito traps use a Vapona strip infused with dichlorvos in the bottom of the collection jar; this chemical would be contained in the collection device and would not contact nor interact with the environment. Emergence traps for mosquitos may contain octanol. Emergence traps are typically a pyramid-shaped, floating trap with a collection jar at the apex that collects adult mosquitoes as they emerge from the water surface. The chemical materials in the collection jar would not have a direct contact or interaction with the environment. Therefore, no impact would occur to surface water or groundwater.

Impact WR-2: The Surveillance Alternative collection devices would not contact nor interact with the environment. **No impact** would occur to surface water or groundwater.

9.2.4 Physical Control Alternative

Physical controls for mosquitoes consists of the direct management of mosquito-producing habitat (including freshwater marshes and lakes, saltwater marshes, temporary standing water, septic tank systems, and wastewater treatment facilities) especially through water control and maintenance or improvement of channels, tide gates, levees, and other water control facilities, or indirect habitat management through public education (see Section 2.4). Physical controls reduce or eliminate mosquito development sites by improving the habitat value for mosquito predators (i.e., providing deepwater sanctuary for larvivorous fish) or by reducing the habitat value for mosquitoes. Because mosquitoes breed in stagnant standing water, the District attempts to reduce these habitats through vegetation management (discussed in Section 9.2.5), increased circulation, steepening banks, changes in water quality, or by reducing the duration that standing water is allowed to persist. The specific method employed is based on site- and project-specific considerations, including whether the activity is conducted to prevent mosquito-producing habitat from forming or in response to existing conditions. Characteristics of the site and waterbody are also considered in planning physical control activities. If mosquito production is found within a septic system, the resident and/or property owner is informed of source reduction measures that they need to research and implement (if applicable) to prevent mosquito production from occurring in the onsite wastewater system and its associated plumbing system. Examples of source reduction measures include inspecting septic tank lids for cracks (and fixing the cracks if present), ensuring the lid gasket (if so equipped) is in good condition, and ensuring that a proper seal occurs when the fasteners are tightened, determining if risers are present and exposed and that they are free of cracks, and ensuring that all vents to the system, including those on the roof of the building, are completely covered with a durable 1/16-inch mesh screen type material. The District conducts physical control activities, requests landowners and stewards to implement maintenance activities, and advises landowners on source reduction for mosquito habitat. Any requests to landowners and stewards will include a clear statement regarding the need for consultation with resource agencies to determine potential risks to sensitive habitats and special-status species as well as to determine the need for any permits prior to commencement of any work.

Three types of physical control practices are implemented:

1. Maintenance activities include removal of sediments from existing water circulation ditches; repair of existing water control structures, removal of debris in natural channels, clearance or trimming of brush for access to streams tributary to wetland areas, and filling of existing, nonfunctional water circulation ditches to achieve required water circulation dynamics and restore ditched wetlands.

2. New construction typically involves the creation of new ditches to enhance tidal flow preventing stagnant water.
3. Cultural practices include vegetation (i.e., clearing of vegetation in canals) and water management (i.e., irrigation and inundation practices), placement of culverts or other engineering works, and making other physical changes to the lands.

The District performs these physical control activities in accordance with all appropriate environmental regulations and in a manner that generally maintains or improves habitat values for desirable species. Physical control activities can be relatively minor, typically consisting of up to 10,000 linear feet of ditch maintenance per year, and are often covered by the District's 5-year USACE, SWRCB/RWQCB, and BCDC regional wetlands permits (Section 2.8.1.3). Filling or periodically draining artificially ponded areas such as ornamental ponds and irrigation ponds can be cost-effective and environmentally acceptable; however, these methods are not appropriate strategies in natural areas, in large permanent waterbodies, or in areas set aside for stormwater or wastewater retention. Consequently, the District does not usually construct new physical control projects in freshwater bodies including marshes and ponds. In saline and brackish marsh habitat, physical control measures are typically designed to reduce salt-marsh mosquito production through enhancement of the frequency and duration of tidal inundation or through other water management strategies.

Physical control activities for other vectors such as rats and mice are based on the District's site inspections. They may include education of property owners on sanitation, exclusion, and rodent proofing. The District may also remove the vector, typically by trapping methods under the Nonchemical Control/Trapping Alternative.

Maintenance of existing facilities, construction of new water control facilities and changes in water management strategies could affect existing drainage patterns and water quality locally. However, existing trails, levees, and access roads will be used whenever possible when walking or using small equipment in marshes or other sensitive habitats (BMP A3). Furthermore, the District will implement control measures during ditch maintenance and during construction or repair of tide gates and other water control structures in tidal marshes to avoid disruption to natural drainage patterns (BMP G9). For example, spoil material sidecast during ditch maintenance would not exceed 4 inches above the marsh plain within 6 feet of the ditch or exceed 8 inches above the marsh plain at further distances, and the sidecast material would be breached periodically to not impede local runoff (BMP G12). Because physical control activities would typically be implemented to improve drainage at the site and reduce the duration of standing water in areas that produce mosquitoes and because control measures will be used to minimize disruption of natural drainage patterns, these activities would not adversely and substantially change or alter drainage amounts, timing, or patterns or substantially increase soil erosion. Furthermore, permitted projects are typically inspected by resource agency personnel to confirm that permit conditions were met.

Physical controls would likely improve long-term water quality conditions. Physical control activities would be designed to improve drainage or increase water circulation, which can increase dissolved oxygen and reduce water temperatures, improving these water quality conditions locally. Although modifying water circulation patterns could increase localized areas of scour due to increased water velocities, particularly near structures, water control facilities (e.g., tide gates, levees) would be designed using best engineering practices to minimize scour and soil erosion near the structure for long-term stability. Potential increases in turbidity in the waterbody would be limited to during and immediately after the action and would not extend beyond the vicinity of the area being improved. Changes to groundwater conditions such as water quality or recharge would not occur.

Removal of sediments from existing water circulation ditches during maintenance activities has the potential to temporarily approach or exceed turbidity water quality objectives in nearby downstream receiving waters. However, maintenance activities are short in duration (often less than 1 day), are localized to site-specific areas, and are transitory in location. Additionally, a majority of small ditch work is

performed by hand (BMP G14), limiting the amount of ground-disturbing activity that could occur when maintaining these areas, and other control measures will be used to minimize soil disturbance and erosion near waterways (BMPs G5, G6, and G8). Therefore, this temporary and transitory potential impact to surface water or groundwater is less than significant.

Impact WR-3: The Physical Control Alternative's activities to modify water circulation, remove sediment, and maintain water control facilities to reduce habitat conditions for mosquito production would have a **less-than-significant** impact on soil erosion and water resources and no mitigation is required.

9.2.5 Vegetation Management Alternative

District staff's direct vegetation management generally consists of activities to reduce the mosquito habitat value of sites by improving water circulation or access by fish and other predators, or to allow District staff's access to standing water and known sources of mosquito production for inspections and treatment. The District uses hand tools, other mechanical means, or herbicide applications to thin or remove vegetation. These activities primarily occur in aquatic habitats to assist with the control of mosquitoes but are also implemented in terrestrial habitats to help with the control of other vectors. The District may also perform vegetation management to assist other agencies and landowners with the management of invasive/nonnative weeds in vector habitats. These actions are typically performed under the direction of the concerned agency, which also maintains any required permits.

9.2.5.1 *Mechanical Removal of Vegetation*

Vegetation management work in riparian areas is typically performed by hand, using handheld tools, prior to the onset of heavy rains (BMPs F2 and F7). If heavy equipment is needed, control measures will be used to minimize the affected area, minimize soil erosion, minimize and contain turbidity, and avoid, contain, and clean up any leakage of toxic materials (BMP F11). Mechanical and hand removal of vegetation from aquatic habitats has the potential to temporarily approach or exceed turbidity water quality objectives in downstream receiving waters. However, the vegetation control activities are short in duration (typically less than 1 day), are localized to site-specific areas, and are transitory in location. Therefore, this temporary and transitory potential impact to surface water is less than significant. No impact to groundwater is associated with these activities.

Impact WR-4: Mechanical removal of vegetation from aquatic habitats would have a **less-than-significant** impact to surface water and **no impact** to groundwater resources. No mitigation is required.

9.2.5.2 *Herbicide Application*

Herbicides the District has used in the past or could use in the future are listed in Table 2-1 along with information regarding the timing/season of application, method of application, and types of sites where they are applied. Section 4.6 of the *Ecological and Human Health Assessment Report* (Appendix B) includes descriptions of each herbicide and information on their environmental fate and toxicity.

Potential effects from applications of herbicides include low dissolved oxygen, aquatic toxicity to nontarget species, and contributions to instream exceedances of water quality criteria, particularly if applied in previously impacted waterbodies. For example, the water quality objective that establishes a minimum concentration for dissolved oxygen may not be met in some instances, such as when aquatic weeds killed by herbicides decompose rapidly and consume dissolved oxygen in the process. Some herbicide applications also have the potential to approach or exceed the narrative toxicity water quality objective, numeric water quality objective, or receiving water monitoring trigger for the specific active ingredient. Herbicides that are not labeled for aquatic use and are subject to potential spray drift or surface water runoff may cause acute or chronic toxicity.

However, the District will apply all herbicides in strict conformance with label requirements, which have been approved by CDPR for use in California (BMP H1). Pesticide labels are legal requirements and include instructions telling users how to apply the product and precautions the applicator should take to protect human health and the environment. Herbicide applications will comply with label restrictions on application rates and methods, storage, transportation, mixing, and container disposal and by BMPs H1, H3, H5, H6, and H9. In addition, aquatic herbicides are applied in conformance with the APAP as required by the NPDES Aquatic Weed Control Permit.

The District will implement label requirements and District BMPs to reduce potential adverse effects to surface and groundwater resources from applied chemicals during and following herbicide applications. Materials will be applied at the lowest effective concentration for the environmental conditions (BMP H3). Spray nozzles will be adjusted to produce larger droplet size rather than smaller droplet size, low nozzle pressures would be use where possible, and spray nozzles will be maintained at a predetermined maximum distance from target vegetation (BMP H8). Applicators will be aware of wind conditions, to minimize unwanted drift to waterbodies and adjacent areas, and aware of potential rain, if rain is a determining factor on material application (BMPs H6 and H7). If special-status aquatic wildlife species are potentially present, only herbicides and adjuvants approved for aquatic areas will be applied within a predetermined distance from aquatic features (BMP H10).

The District will also implement hazardous materials and spill management control measures to prevent and reduce potential exposure of spilled chemicals to surface and groundwater resources (BMPs I1 through I6). These measures will require development and implementation of a hazardous spill plan and procedures used to minimize the risk of an accidental spill or release. District control measures also require that mixing and transferring of materials will occur within a contained area (BMP H5) and materials will be disposed at an approved site (BMP H9).

District staff will monitor sites post-treatment to determine if the target weeds were effectively controlled with minimum impact to the environment and nontarget organisms. This information will be used to help design future treatment methods in the same season or future years to respond to changes in site conditions (BMP H11). Implementation of these BMPs will reduce exposure of applied chemicals to surface and groundwater resources during and following application of the material.

Herbicides and adjuvants the District may use are grouped below based on toxicity to fish and aquatic invertebrates. They are discussed in more detail in Appendix B, *Ecological and Human Health Assessment Report* (Sections 4.6 and 4.7, respectively).

9.2.5.2.1 Registered Herbicides with Relatively Low Toxicity to Fish and Aquatic Invertebrates

Imazapyr is a systemic, nonselective, pre- and post-emergent herbicide used for the control of a broad range of terrestrial and aquatic weeds, including terrestrial annual and perennial grasses, broadleaf herbs, woody species, and riparian and emergent aquatic species. Imazapyr is water-soluble, can run off to surface waterbodies, and degrades in clear, open water. However, it is persistent in soil and leaches to groundwater. It has low toxicity to fish and aquatic invertebrates. Based upon imazapyr's toxicity and environmental fate, and using District BMP application techniques, these products would result in minimal, if any, adverse effects.

Glyphosate is a nonselective, post-emergent, and systemic herbicide registered for use in agricultural and nonagricultural areas. It is used to control emergent foliage, but is not effective on submerged or mostly submerged foliage. Glyphosate is highly water-soluble, but binds tightly to soil and sediments. It has a low tendency to run off when applied to land because of strong adsorption to soil particles and it has a low potential to move to groundwater. Glyphosate degrades in soil in about a month. It has low toxicity to fish and aquatic invertebrates.

The District will apply all herbicide formulations following District BMPs and in strict conformance with their APAPs (if applicable) and label requirements, which have been approved by CDPR for use in California.

District BMP application techniques and using care during herbicide applications will minimize adverse effects and substantially avoid degradation of water quality. Therefore, application of these herbicide active ingredients (i.e., imazapyr and glyphosate) would have a less-than-significant impact to surface water or groundwater resources when applied in accordance with label instructions and District BMPs.

Impact WR-5: Application of the herbicides imazapyr and glyphosate would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.5.2.2 Registered Herbicides with Moderate Toxicity to Fish or Aquatic Invertebrates

Triclopyr is used for the control of woody plants and annual and perennial broadleaf weeds. It is absorbed by leaves and roots and is moved throughout the plant into the foliage. Triclopyr is highly soluble, is moderately persistent in soil (with sorption to soil increasing with time), but degrades rapidly in clear, open water. It is moderate to highly toxic to fish, but is practically nontoxic to invertebrates. Based upon triclopyr's toxicity and environmental fate, implementation of District BMPs, and using recommended BMP application techniques, these products should result in minimal, if any, adverse effects.

The District will apply all herbicide formulations following District BMPs and in strict conformance with their APAPs (if applicable) and label requirements, which have been approved by CDPR for use in California. District BMP application techniques and using care during herbicide applications will minimize adverse effects and substantially avoid degradation of water quality. Therefore, application of this herbicide active ingredient (i.e., triclopyr) would have a less-than-significant impact to surface and groundwater resources when applied in accordance with label instructions and District BMPs.

Impact WR-6: Application of the herbicide triclopyr would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.5.2.3 Adjuvants with High Toxicity to Fish or Aquatic Invertebrates

Alkylphenol ethoxylates (APEs) are identified in Appendix B, *Ecological and Human Health Assessment Report* (Section 4.7.1) as having high toxicity to fish or other aquatic organisms. APEs include a broad range of chemicals that act as adjuvants. APEs bind strongly to aquatic particles in river and coastal environments and are persistent in sediments. Nonylphenol and short-chain nonylphenol ethoxylates are moderately bioaccumulative² and extremely toxic to aquatic organisms. The USEPA has recently recommended that nonylphenol and short-chain ethoxylates be evaluated further due to their widespread use (past and present), persistence, and possible estrogen-mimicking behavior. Potential contamination of surface water runoff and groundwater is particularly high for highly soluble or highly mobile chemicals.

The District will apply all herbicide formulations and adjuvants following District BMPs and in strict conformance with their APAPs (if applicable) and label requirements, which have been approved by CDPR for use in California. District BMP application techniques and using care during herbicide applications will minimize adverse effects and substantially avoid degradation of water quality. Therefore, application of these adjuvants would have a less-than-significant impact to surface and groundwater resources when applied in accordance with label instructions and District BMPs.

Impact WR-7: For APEs, application of these herbicides would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

² Bioaccumulation is defined as the increase in concentration of a chemical from the environment to the first organism in a food chain. For additional information, see Chapter 6 (Sections 6.1.1.3, 6.25, and 6.27).

9.2.5.2.4 Adjuvants with Unknown Toxicity to Fish or Aquatic Invertebrates

Oil adjuvants (modified plant oils and methylated seed oils) can increase the penetration of oil-soluble herbicides into plants. Little is known of the environmental fate of these adjuvants. Modified plant oils and methylated seed oils are essentially nontoxic to most organisms, including plants. Although some information is lacking regarding the toxicity and environmental fate of these oils, these products should result in minimal adverse effects when using District BMP application techniques.

Lecithins are naturally occurring phospholipids in biological cell membranes. Little is known about the toxicity or environmental fate of lecithins. Although some information is lacking regarding the toxicity and environmental fate of these products, use of these products should result in minimal adverse effects when used in accordance with District BMP application techniques.

Furthermore, the District will apply all herbicide formulations and adjuvants following District BMPs and in strict conformance with their APAPs (if applicable) and label requirements, which have been approved by CDPR for use in California. Due to the lack of reported, documented effects of these adjuvants, proper application of methods using District BMP application techniques will minimize adverse effects and substantially avoid degradation of water quality. Therefore, application of these chemicals would have a less-than-significant impact to surface and groundwater resources when applied following label instructions and District BMPs.

Impact WR-8: Application of modified plant oils and lecithins would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.6 Biological Control Alternative

Biological control of mosquitoes involves the intentional use of vector pathogens, parasites, and predators to reduce the mosquito population. It is one of the principal components of the IPM approach followed by Mosquito Vector Control Association of California member agencies, in which the emphasis is on source reduction and control of mosquitoes in their immature stages. Mosquito pathogens include an assortment of viruses and bacteria, but the only commercially available mosquito pathogen is the bacterial pathogen *Bacillus sphaericus* or Bs (discussed below in Section 9.2.7, Chemical Control Alternative). Mosquito parasites are not generally available commercially for mosquito control at present. Mosquito predators are represented by insects, fish, birds, and bats that consume larval or adult mosquitoes as prey. Although the District supports the presence of a variety of species, only mosquitofish (*Gambusia affinis*) are commercially available to use at present. Currently, no commercial biological control agents or products are available for tick, wasp, and yellow jacket control, and the District does not employ predators for rodent control.

Wastewater discharges from mosquitofish hatcheries have the potential to convey nutrients, sediments, and other potential pollutants to storm drains, downstream receiving waters, and groundwater. If the wastewater is discharged to a sanitary sewer, the potential pollutants can be removed by the wastewater treatment plant. If the wastewater is discharged to land as irrigation water, natural degradation would provide some level of treatment via chemical, biological, and physical processes that occur as the wastewater flows over and percolates through the soil. However, mosquitofish are no longer reared at District hatchery facilities. The District will purchase mosquitofish from another district and only maintain a small stock of fish in a holding tank on site to meet demand. The wastewater will be discharged to a sanitary sewer, where the potential pollutants can be removed by the wastewater treatment plant. Because the volume and frequency of discharges are relatively minor and to the sanitary sewer, the impact of this alternative to surface water and groundwater is less than significant.

Impact WR-9: The Biological Control Alternative's use of mosquitofish limits wastewater discharges to the sanitary sewer or upland areas. Therefore, the use of mosquitofish would have a **less-than-significant** impact on surface and groundwater resources and no mitigation is required.

Because mosquitofish may potentially impact red-legged frog and tiger salamander populations, use of mosquitofish is limited to man-made water features such as ornamental fish ponds, ponds, water troughs, water gardens, fountains, unmaintained swimming pools, and other types of isolated man-made ponds where their migration into habitats used by special-status species is limited. High populations of mosquitofish in a waterbody could increase nutrient concentrations, causing algal blooms and a subsequent drop in dissolved oxygen. However, because mosquitofish use is limited to man-made water features that are hydrologically isolated from receiving waters, their impact to surface water is less than significant. Because the connection between these man-made waterbodies and natural surface waters or groundwater is limited or nonexistent, the impact of this alternative is less than significant.

Impact WR-10: The Biological Control Alternative's use of mosquitofish is limited to man-made water features that are hydrologically isolated from receiving waters. Therefore, the use of mosquitofish would have a **less-than-significant** impact on surface and groundwater resources and no mitigation is required.

9.2.7 Chemical Control Alternative

Chemical control consists of the application of chemicals to directly reduce populations of vectors that pose a risk to public health (herbicides are discussed in Section 9.2.5, Vegetation Management Alternative). The majority of chemical control tools are used for mosquito abatement. As part of the IVM program, the District prioritizes the least toxic materials available for control of the larval stages, focusing on bacterial larvicides, growth regulators, and surface films rather than pyrethroids. Control of adult mosquitoes may become necessary under some circumstances, such as in the event of a disease outbreak (documented presence of infectious virus in active host-seeking adult mosquitoes), or lack of access to larval sources and habitats leading to the emergence of large numbers of biting adult mosquitoes. The active ingredients currently used for control of adult mosquitoes have been deliberately selected for lack of persistence and minimal effects on nontarget organisms when applied in accordance with label guidelines for ULV mosquito control.

The District also uses insecticides to control populations of ground-nesting yellow jacket wasps. The District does not currently perform control work with respect to tick populations but may potentially do a limited amount of control work in the future. This activity is generally triggered by public or agency requests rather than as a result of regular surveillance activities. The District does not treat yellow jacket wasp nests that are located inside or on a structure; instead, the resident is encouraged to contact a private pest control company. Likewise, residents complaining of honeybee swarms or hives are referred to the County Agricultural Commissioner's Office for a referral list of beekeepers. If a District technician deems it appropriate to treat stinging insects, they will apply the insecticide directly within the nest to avoid drift or harm to other organisms. Alternatively, they will place tamper-resistant traps or bait stations, selective for the target insect in the immediate environment. Chemicals used in the traps are contained and do not interact with the environment. District staff use no rodenticides.

Potential effects from chemical applications of pesticides include increased aquatic toxicity for nontarget species and contributions to instream exceedances of water quality criteria. For example, some chemical applications have the potential to approach or exceed the narrative toxicity water quality objectives, numeric water quality objectives, or receiving water monitoring triggers for the specific active ingredient, particularly if applied in previously impacted waterbodies. However, the District applies all chemicals in strict conformance with label requirements, which have been approved by CDPR for use in California (BMP H1). Pesticide labels are application requirements and include instructions informing users how to apply the product and precautions the applicator should employ to protect human health and the environment. Pesticide applications would comply with label restrictions on application rates and methods, storage, transportation, mixing, and container disposal as well as District BMPs H1, H3, H5, H6, and H9. In addition, chemicals are applied in conformance with the PAP as required by the NPDES

Vector Control Permit. All BMPs included in the PAP and product labels are followed and include such measures as restrictions in applications to certain land uses and weather (i.e., wind speed) parameters.

The District will implement label requirements and District BMPs to reduce adverse effects to surface and groundwater resources from the applied chemicals during and following pesticide applications. To minimize the amount of pesticides, pesticide applications will be informed by surveillance and monitoring of vector populations (BMP H4). Materials will be applied at the lowest effective concentration for the environmental conditions (BMP H3). For non-ULV applications, spray nozzles will be adjusted to produce larger droplet size rather than smaller droplet size, low nozzle pressures will be used where possible, and spray nozzles will be maintained within a predetermined maximum distance from target areas. For ULV applications, sprays will be calibrated for the proper droplet size (BMP H8). Applicators will be aware of wind conditions to minimize unwanted drift to waterbodies and adjacent areas, and aware of potential rain when rain is a determining factor on material application (BMP H6 and H7). Pesticides that could affect insect pollinators will not be applied in liquid or spray/fog forms over large areas (more than 0.25 acre) during the day when honeybees are present and active or when other pollinators are active (BMP H12). If special-status aquatic wildlife species are potentially present, only pesticides and adjuvants approved for aquatic areas will be applied within a predetermined distance from aquatic features (BMP H10) to minimize the potential for interaction with terrestrial wildlife.

The District will also implement hazardous materials and spill management control measures to prevent and reduce potential exposure of spilled chemicals to surface and groundwater resources (BMPs I1 through I6). These measures will require development and implementation of a hazardous spill plan and procedures used to minimize the risk of an accidental spill or release. District control measures also require that mixing and transferring of materials will occur within a contained area (BMP H5) and materials will be disposed at an approved site (BMP H9).

District staff will monitor sites post-treatment to determine if the target vectors were effectively controlled with minimum effect to the environment and nontarget organisms. This information will be used to help design future treatment methods in the same season or future years to respond to changes in site conditions (BMP H11). Implementation of these BMPs will reduce exposure of applied chemicals to surface and groundwater resources during and following application of the material.

All chemical active ingredients and adjuvants the District currently uses are reviewed and evaluated in the *Ecological and Human Health Assessment Report* (Appendix B). The following sections evaluate groups of chemicals based on their target organism or life stage.

9.2.7.1 Mosquito Larvicides

Larvicides are used to manage immature life stages of mosquitoes including larvae and pupae in aquatic habitats. Temporary aquatic habitats are usually targeted because permanent waterbodies generally support natural mosquito predators such as fish. The larvicides are applied using ground application equipment and rotary and/or fixed wing aircraft. Applications may be repeated at any site at recurrence intervals ranging from annually to weekly.

Under some circumstances, and at the request for service from District clients, the District performs mosquito surveillance near septic systems (onsite wastewater treatment systems) by inspecting or removing the lid(s) on the system to determine the presence of larval and/or adult mosquitoes. Or, if mosquito populations are detected via adult mosquito surveillance (e.g., adult mosquito traps) in an area associated with a septic system, the District staff may choose to treat soil and/or surface water in the vicinity of a septic tank that appears to have failed or malfunctioned. In this situation, the District may provide selected mosquito larvicide treatment to the tank and/or the septic leach/drain field and system environs. This treatment is intended to efficiently and effectively break the cycle of mosquito production in order to address the potential for transmission of disease in humans, livestock, domestic animals, and wildlife. The larvicides currently used include materials not known to adversely impact septic system

bacteria: *Bacillus sphaericus* as an active ingredient (e.g., VectoLex), methoprene, (e.g., Altosid briquets), larvicide oils (e.g., BVA 2 and CocoBear), and monomolecular films (e.g., Agnique MMF). A larvicide oil or monomolecular film must be used if mosquito larvae are in the pupal phase. These products are selected for these special physical conditions as they are not known to impact the subsurface resident bacterial mats that are associated with septic system leach fields. However, because numerous household chemical products are known to adversely impact the septic bacteria (USEPA 2015; Ecodrain 2015; National Pesticide Information Center 2015), a remote chance may exist that septic system bacteria could be impacted by some methoprene-based products.

Although no published information is available about the potential toxicity of some currently used methoprene-based products (e.g., Vectolex, Altosid briquets) to septic system bacterial populations (USEPA 2001; Schooley et al. 1975), applications of these products near the septic system should not be a problem. Based on currently available information, and using appropriate District BMP techniques, methoprene should be an acceptable larvicide to treat mosquitoes associated with private septic systems. The District can revisit its use of methoprene for malfunctioning or improperly sealed septic systems if and when additional studies are conducted and published. Meanwhile, the District will rely as much as possible on the other methods of mosquito larvae control and insist that property owners resolve the problems with their private systems, i.e., keeping the tanks impervious to mosquito entry and the leach field operating properly without water rising to the ground surface to stagnate. With the exception of some limitations on the direct application of methoprene-based products to the septic tank, the fate and transport of these larvicides is generally similar to the characteristics of fate and transport to soils and water under the other approved applications (see Sections 9.2.7.1.1 and 9.2.7.1.2).

9.2.7.1.1 Biological Agents

Bacillus sphaericus is a bacterial larvicide that is applied to sources of mosquito production, such as irrigation ditches, floodwater, standing ponds, woodland pools, pastures, tidal water, fresh- or saltwater marshes, and stormwater retention areas. It damages and paralyzes the gut of mosquito larvae that ingest the spores. Although dormant Bs spores may persist in the environment for several weeks to months and the δ -endotoxins generally persist for 2 to 4 weeks following application, the δ -endotoxins degrade rapidly in sunlight and are degraded by soil microorganisms. Bs does not percolate through the soil and readily binds to sediments. It is highly selective for mosquitoes and is not toxic to nontarget species, including birds, mammals, fish, and invertebrates in amounts that effectively control mosquito larvae. For these reasons, Bs should result in minimal, if any, adverse effects to surface water or groundwater.

Bti is applied in a similar manner and often in combination with Bs. Bti toxins may persist in soil for several months, yet a half-life for typical Bti products on foliage is approximately 1 to 4 days due to rapid degradation in sunlight. Toxicity is minimal to nonexistent to nontarget avian, freshwater fish, freshwater aquatic invertebrates, estuarine and marine animals, arthropod predators/parasites, honeybees, annelids, and mammalian wildlife at the label use rates of registered Bti active ingredients. For these reasons, Bti should result in minimal, if any, adverse effects to surface water or groundwater.

Spinosad is a biologically derived insecticide produced from the fermentation of *Saacharopolyspora spinosa*, a naturally occurring soil organism. It activates the central nervous system of insects through interaction with neuroreceptors and causes mortality through continuous stimulation of the insect nervous system. Spinosad degrades quickly in sunlight in both aqueous and soil environments. It adsorbs strongly to soil particles where it is quickly metabolized by soil microorganisms under aerobic conditions and is therefore unlikely to leach into groundwater. Spinosad is practically nontoxic to birds and mammals but is slightly to moderately toxic to fish and most aquatic invertebrates. However, low amounts typically used for mosquito control would not likely pose a significant risk to potential ecological receptors. For these reasons, spinosad should result in minimal, if any, adverse effects to surface water or groundwater.

The District will apply all biological agent larvicides following District BMPs and in strict conformance with their PAP and the label requirements, which have been approved by CDPR for use in California. Proper application of methods using District BMPs will minimize adverse effects and substantially avoid degradation of water quality. Therefore, the use of these larvicides would have a less-than-significant impact to surface and groundwater resources.

Impact WR-11: Application of the biological agents Bs, Bti, and spinosad would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.7.1.2 Hydrocarbon Esters

Methoprene is an insect growth regulator that is applied at very low concentrations for mosquito control in the form of briquettes, pellets, granules, and liquid. It consists of two enantiomers: S-methoprene and R-methoprene, with S-methoprene being the biologically active enantiomer. Fate and transport characteristics of the s-enantiomer and the mixture are similar, but toxicity differs. Methoprene readily binds to suspended solids in the water column and soils. It rapidly degrades by photolysis and is metabolized in soil under both aerobic and anaerobic conditions. Although it may exhibit toxicity to fish and aquatic invertebrates (generally at higher concentrations and application rates than used for mosquito control), as well as nontarget insects including moths, butterflies, and beetles, methoprene is considered the least toxic of all larvicide alternatives especially at concentrations allowed for mosquito control.

These products would have a less-than-significant impact to surface or groundwater resources, including the limited use near septic systems, when applied following District BMPs and used in accordance with the recommended BMP application techniques described in their PAP and product label requirements.

Impact WR-12: Application of methoprene would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.7.1.3 Surfactants

The monomolecular film used in California for the control of mosquito larvae is alpha-isoctadecyl-omega-hydroxypoly (oxyethylene). Monomolecular films spread a thin film on the surface of the water that makes it difficult for mosquito larvae, pupae, and emerging adults to attach to the water's surface, causing them to drown. It also disrupts larval respiration. Reported half-lives of monomolecular films in water range from 5 to 22 days. It may temporarily impact nontarget surface-breathing insects but has no observable effects to amphibians, fish, or other aquatic organisms. These products should not result in adverse water quality conditions in surface water or groundwater when used in accordance with approved BMP application requirements and techniques.

Specially derived aliphatic solvents (e.g., mineral oils and aliphatic petroleum hydrocarbons) are used to form a coating on top of water to drown larvae, pupae, and emerging adult mosquitoes. Petroleum distillates can be more effective than monomolecular films but break down much more rapidly (2 to 3 days). They have low water solubility and high sorption to organic matter. They are practically nontoxic to most nontarget organisms. Using District BMP application techniques, these products should result in minimal, if any, adverse effects to water quality conditions in surface water or groundwater.

The District will avoid use of surfactants, when possible, in sites with aquatic nontarget species or natural enemies of mosquitoes present such as nymphal damselflies and dragonflies, dytiscids, hydrophilids, corixids, notonectids, and ephydriids. Although surfactants can be used with pupae, microbial larvicides (e.g., Bti, Bs) or insect growth regulators (e.g., methoprene) are often used with other earlier life stages (BMP H2) to prevent development of pupae and minimize use of surfactants.

The District will apply all surfactant larvicides following District BMPs and in strict conformance with their PAP and the label requirements, which have been approved by CDPR for use in California. Proper application using District BMPs will minimize adverse effects and substantially avoid degradation of water

quality. Therefore, the use of these chemicals would have a less-than-significant impact to surface water or groundwater resources.

Impact WR-13: Application of the surfactant larvicides oxyethylene, mineral oils, and aliphatic petroleum hydrocarbons would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.7.2 Mosquito Adulticides

The use of adulticides to control mosquitoes is the method of control in the bottom tier of the District's IVM program. Adulticides are only applied when other tools are not available or applicable and when specific criteria are met, including species composition, population density, proximity to human populations, and/or human disease risk. The active ingredients currently in use have been deliberately selected for lack of persistence and minimal effects on nontarget organisms when applied in strict conformance to label instructions for ULV mosquito control. Adulticides are applied following District BMPs, using ground application equipment or applied in the future using rotary and/or fixed wing aircraft, and used in strict conformance with label requirements and the District's PAP.

In the special circumstance of septic tanks/onsite wastewater treatment systems, and at the request for service from District clients, the District inspects for the presence of larval and/or adult mosquitoes. Mosquito populations may also be detected via adult mosquito surveillance in a given area (e.g., adult mosquito traps). The District staff may observe surface water in the vicinity of a failed septic tank. In these situations, the District may provide selected mosquito adulticide treatment to the environs of the tank and/or the septic leach system. The adulticides currently used for malfunctioning or improperly sealed septic systems include MGK Pyrocyde 7067 (pyrethrin), Zenivex E20 (etofenprox), or Merus 2.0 (pyrethrin) (National Pesticide Information Center 2014). Adulticides are often applied in a focused process to selected areas contiguous to the septic tank/system. Adult mosquito control performed in relation to mosquito production from septic systems is typically site specific, and the adulticide is applied with handheld equipment (e.g., handheld ULV fogger, ULV backpack fogger). However, if the potential for transmission of disease by mosquitos associated with septic systems appears to be problematic, the District may, in that instance, prudently use more aggressive approaches such as truck-mounted applications. In these situations the District would use proven BMP techniques aligned with these applications to reduce or minimize any nontarget impacts.

Because numerous household chemical products are known to adversely impact the septic bacteria (Ecodrain 2015), a remote chance may exist that septic system bacteria could be impacted by some pyrethrin products (National Pesticide Information Center 2014; USEPA 2006c). To alleviate this concern, the applications would be conducted using strict BMP techniques and would generally not be introduced directly into the tank. The District can revisit its use of pyrethrin products for septic systems when additional studies are conducted and published. Meanwhile, the District will rely as much as possible on the other methods of control and insist that property owners resolve the problems with their private systems. With the exception of some limitations on the direct application of pyrethrin-based products to the septic tank, the fate and transport of these adulticides is generally similar to the characteristics of fate and transport to soils and water under other approved applications. Typical applications to standing water above the leach field would not likely result in transport or leaching to the biological bacterial mat in the leach lines because they adsorb strongly to soil surfaces, and are generally considered immobile in soils and, therefore, are unlikely to leach to groundwater (USEPA 2006c). Although special conditions are associated with the septic applications, the fate and transport of these adulticides when used in areas associated with septic systems are generally similar to those of other application scenarios (see Section 9.2.7.2.1).

9.2.7.2.1 Pyrethrins and Pyrethroids

The District uses pyrethrins and pyrethroids to control adult mosquitoes and yellow jacket wasps. Pyrethrins are naturally occurring products distilled from the flowers of *Chrysanthemum* species. Pyrethroids are

synthetic compounds that are chemically similar to the pyrethrins, but have been modified to increase their stability and activity against insects, while minimizing their effect on nontarget organisms. First generation or “Type I” photosensitive pyrethroids include d-allethrin, phenothrin (sumithrin), prallethrin, resmethrin, and tetramethrin. Typically, these pyrethroids are used indoors and around residential areas. The newer second-generation pyrethroids are mostly “Type II” pyrethroids. The active ingredients that fall into this group include deltamethrin esfenvalerate, and permethrin. Type II pyrethroids are more toxic than Type I pyrethroids because they are less photosensitive and persist longer in the environment. Etofenprox is a synthetic pyrethroid-like chemical, differing in structure from pyrethroids in that it lacks a carbonyl group and has an ether moiety, whereas pyrethroids contain ester moieties. Pyrethrins and pyrethroids act by causing a persistent activation of the sodium channels on insect neurons.

Pyrethrins and pyrethroids quickly adsorb to suspended solids in the water column and partition into the sediment. They adsorb strongly to soil surfaces, and are generally considered immobile in soils and, therefore, are unlikely to leach to groundwater (USEPA 2006c). These materials are relatively nontoxic to mammals and birds, but are highly toxic to fish and invertebrates. The major route of degradation is through photolysis in both water and soil. Pyrethrins and pyrethroids may be persistent in environments free of light, and pyrethroids as a class have been implicated in 303(d) listings of sediment toxicity in urban creeks (BASMAA 2013). However, the ULV applications common to mosquito control and the limited use at ground-dwelling yellow jacket wasp nests (that pose an imminent threat to people or to pets) encourage dissipation rather than persistence in the environment.

Insecticides containing pyrethrins and pyrethroids usually also contain PBO as a synergist. PBO interferes with the insect’s ability to detoxify pyrethrins and pyrethroids, thus enhancing the product’s effectiveness. PBO has low toxicity to mammals but is a possible endocrine disruptor and is included in the final list of chemicals for screening under USEPA’s Endocrine Disruptor Screening Program. It is moderately to highly toxic to fish and is highly toxic to aquatic invertebrates. PBO is moderately mobile in soil and water but degrades rapidly in the environment by photolysis and through metabolism by soil microbes. Although it degrades rapidly, release of PBO to the environment may “activate” persistent pyrethroids that are already present in the sediment. However, PBO would have a less-than-significant impact on surface water or groundwater when applied following District BMPs and using ULV techniques, and when used in strict conformance with label requirements and the District’s PAP.

Impact WR-14: Application of the synergist PBO would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

The District applies pyrethrins in terrestrial and aquatic environments for adult mosquito control using ULV techniques. They are also used locally to treat ground-dwelling yellow jacket wasp nests. Pyrethrins quickly adsorb to suspended solids in the water column and adsorb strongly to soil surfaces making them immobile in soils and unlikely to leach into groundwater. They degrade via photolysis and are likely to persist under anaerobic conditions. Pyrethrins have low to moderate acute toxicity to mammals but are practically nontoxic to birds. They are very highly toxic to freshwater fish and invertebrates. Several studies have shown that pyrethrins applied using ULV techniques do not accumulate in water or sediment following repeated applications. These studies also determined that no toxicity is associated when exposure is limited to the amounts used when following ULV protocols for mosquito control (Lawler et al. 2008; Amweg et al. 2006). Pyrethrins would have a less-than-significant impact on surface water or groundwater, including their limited use near septic systems, when applied following District BMPs and using ULV techniques, and when used in accordance with label requirements and the District’s PAP.

Impact WR-15: Application of pyrethrins would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Allethrins (d-*trans* isomer) are Type I synthetic pyrethroids that are usually combined with synergists such as PBO. They are typically applied as an aerosol to yellow jacket wasp ground nests. Any material that gets into the air is rapidly degraded by photolysis in less than 8 hours. The toxicity of allethrin varies

depending on which of its four isomers are present. Allethrin is highly toxic to fish and invertebrates but degrades too quickly to result in substantial adverse effects to surface or groundwater when applied following District BMPs and used in accordance with label and PAP requirements. Use of allethrin would have a less-than-significant impact on surface water or groundwater.

Impact WR-16: Application of allethrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Permethrin is a Type I synthetic pyrethroid that is usually combined with synergists such as PBO to control adult mosquitoes using ULV techniques and for yellow jacket wasp control. It is hydrophobic and tends to partition to soil and sediment. Its primary degradation pathways include photolysis and aerobic metabolism and it may be persistent in environments free of light. Permethrin is slightly toxic to humans and has been included in the final list of chemicals for screening under USEPA's Endocrine Disruptor Screening Program. It has low toxicity to mammals and is practically nontoxic to birds, but is very highly toxic to fish, aquatic invertebrates, and honeybees.

Permethrin formulations are applied following District BMPs and used in strict conformance with label requirements such as aquatic habitat buffer zones. Permethrin has a strong repellent effect in the environment, which reduces toxic effects to bees under field conditions (Appendix B). Pesticides that could affect insect pollinators will not be applied in liquid or spray/fog forms over large areas (more than 0.25 acre) during the day when honeybees are present and active or when other pollinators are active (BMP H12). When applied in accordance with ULV label instructions, studies have shown rapid dissipation, low persistence, and no observed aquatic fish and invertebrate toxicity following aerial ULV applications (Appendix B). Although one study found higher levels of permethrin on the surface microlayer of the waterbody, corresponding water samples did not contain detected residues, and higher surface microlayer concentrations were not correlated with toxic effects in the waterbody. When applied directly to ground nests of yellow jacket wasps or around residences or parks for tick abatement, the product is used with careful techniques such as controlled applications to very small, localized areas.

Permethrin use is restricted to situations when it is absolutely necessary and in ULV applications that are designed to have the ingredients degrade rapidly and, thus, reduce the potential for impacts to nontarget ecological receptors. When District BMPs are implemented and when materials are applied according to the District's PAP using ULV techniques, the application of permethrin would have a less-than-significant impact on surface water or groundwater, including locations where receiving waters are 303(d) listed for pyrethroids or sediment toxicity because of the study results reported above (from Appendix B).

Impact WR-17: Application of permethrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Phenothrin (or sumithrin) is a Type I synthetic pyrethroid that is usually combined with synergists such as PBO to control adult mosquitoes and yellow jacket wasps. Phenothrin has low solubility and a relatively high affinity for binding to soil. It degrades through photolysis in water and aerobic metabolism in soil but is moderately persistent under aerobic conditions and persistent under anaerobic conditions. Phenothrin is not toxic to mammals or birds but is highly toxic to fish and freshwater invertebrates. When applied locally (for yellow jacket wasp control) or in ULV applications (for mosquito control) following District BMPs and used in accordance with label requirements and the District's PAP, phenothrin would not result in substantial adverse effects to surface water or groundwater. Use of phenothrin would have a less-than-significant impact on surface water or groundwater.

Impact WR-18: Application of phenothrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Prallethrin is a Type I synthetic pyrethroid. The only prallethrin-containing product registered for mosquito control in California is Duet, which also contains phenothrin and PBO. Prallethrin is also intermittently used to target yellow jacket wasp nests. Prallethrin readily sorbs to soils and sediments and degrades

quickly via photolysis in both water and soil. It is not toxic to mammals or birds but is highly toxic to fish and nontarget aquatic invertebrates. When applied locally (for yellow jacket wasp control) or in ULV applications (for mosquito control) following District BMPs and used in accordance with label requirements and the District's PAP, prallethrin would not result in substantial adverse effects to surface water or groundwater. Use of prallethrin would have a less-than-significant impact on surface water or groundwater.

Impact WR-19: Application of prallethrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Resmethrin is a Type I synthetic pyrethroid that is usually combined with synergists such as PBO to control adult mosquitoes in tree holes and using ULV techniques. Resmethrin has a high affinity to bind to soils, sediments, and organic carbon and it degrades rapidly when exposed to light. When not subject to photolysis, it may be environmentally persistent. Resmethrin has low toxicity to mammals but has been included in the final list of chemicals for screening under USEPA's Endocrine Disruptor Screening Program. It is moderately toxic to birds and highly toxic to fish and aquatic invertebrates.

Despite its relatively high toxicity and potential for persistence, studies have shown rapid dissipation, low persistence, and no observed aquatic fish and invertebrate toxicity following aerial ULV application (Appendix B). When District BMPs are implemented and materials are applied according to the District's PAP using ULV techniques, the application of resmethrin would have a less-than-significant impact on surface water or groundwater.

Impact WR-20: Application of resmethrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Tetramethrin is a Type I synthetic pyrethroid that the District may use in the future in very localized applications for the control of yellow jacket wasps. It is slightly mobile in soil but decomposes rapidly by photolysis and hydrolysis and is not considered persistent in the environment. Tetramethrin is practically nontoxic to birds and terrestrial mammals but meets the criteria for classification as a possible human carcinogen. It is highly toxic to fish, aquatic invertebrates, and honeybees. When applied following District BMPs and used according to label requirements and BMP application techniques that limit its release to aquatic systems, tetramethrin would not result in substantial adverse effects to surface water or groundwater. Use of tetramethrin would have a less-than-significant impact on surface water or groundwater.

Impact WR-21: Application of tetramethrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Deltamethrin is a longer lasting Type II synthetic pyrethroid that kills adult mosquitoes, yellow jacket wasps, and ticks on contact and through ingestion. It may be used in the future and applied directly to yellow jacket wasp nest openings or used for localized tick control. Deltamethrin is low to moderately toxic to humans and may cause prenatal damage. It is practically nontoxic to birds but is very highly toxic to fish and nontarget aquatic invertebrates. For this reason, it is not used in aquatic environments. It binds to soils and sediments and may be persistent in the environment. When applied locally to target yellow jacket wasp nests following District BMPs, deltamethrin would not result in substantial adverse effects to surface water or groundwater. Use of deltamethrin would have a less-than-significant impact on surface water or groundwater.

Impact WR-22: Application of deltamethrin would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Esfenvalerate is a relatively new Type II synthetic pyrethroid that is deployed above ground in bait stations for yellow jacket wasp control. It is practically insoluble in water and has a strong tendency to bind to sediments and soil. It degrades via photolysis and aerobic metabolism and does not appear to persist in the environment. Esfenvalerate is considered moderately toxic to mammals and birds, highly

toxic to fish, aquatic invertebrates, and honeybees, and is bioaccumulative in fish. Additionally, esfenvalerate has been included in the final list of chemicals for screening under USEPA's Endocrine Disruptor Screening Program. However, when applied following District BMPs and used according to label guidelines and BMP application techniques that limit its release to the soil surface and aquatic systems, esfenvalerate should not result in substantial adverse effects to surface water or groundwater. Use of esfenvalerate would have a less-than-significant impact on surface water or groundwater.

Impact WR-23 Application of esfenvalerate would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

Etofenprox is a pyrethroid-like insecticide that is used as a mosquito adulticide and is available in formulations that do not contain PBO. It is virtually insoluble in water and stable to hydrolysis but is rapidly degraded by photolysis. Residues of etofenprox are not likely to persist in the environment. It has low toxicity to mammals but is highly toxic to fish and aquatic invertebrates. Based on toxicity and environmental fate, etofenprox would not result in substantial adverse effects to surface water or groundwater when applied following District BMPs and used in accordance with label requirements and the District's PAP. Use of etofenprox would have a less-than-significant impact on surface water or groundwater.

Impact WR-24: Application of etofenprox would have a **less-than-significant** impact to surface and groundwater resources and no mitigation is required.

9.2.7.3 Yellow Jacket Wasp and Tick Abatement

Pyrethrins and pyrethroids are applied directly to yellow jack wasp nest openings and may be used for localized tick control in the future. The active ingredients the District uses are described under Mosquito Adulticides (Section 9.2.7.2).

9.2.8 Other Nonchemical Control/Trapping Alternative

This alternative includes the trapping of rodents and/or yellow jacket wasps that pose a threat to public health and welfare. For both species, tamper-resistant or baited traps are used, which limits the exposure of chemical-containing baits to the environment. This alternative would have no impact to surface water or groundwater.

Impact WR-25: The Nonchemical Control/Trapping Alternative collection techniques use tamper-resistant or baited traps, which limit the exposure of chemical-containing baits to the environment **no impact** would occur to surface water or groundwater.

9.2.9 Cumulative Impacts

Cumulative impacts to water resources are discussed in Section 13.7. In summary, several receiving waters in the Program Area are already included on the CWA 303(d) list as impaired by pesticides, pyrethroids, or sediment toxicity, with the likely cause being the use of common household insecticides containing pyrethroids by members of the public, not vector control activities the District conducts. Where receiving waters (such as San Pablo Bay or Central San Francisco Bay) have been designated as impaired by pesticides, pyrethroids, or sediment toxicity, an existing significant cumulative impact is associated with the combined applications of these pesticides. Therefore, **the District's use of any pyrethroid is contributing in less-than-significant incremental amounts to an existing cumulatively considerable impact to water resources by all users of pyrethroids in the Program Area.** No additional impacts were identified in association with the chemical and nonchemical Program alternatives, and **no additional cumulative impacts are anticipated to occur** (i.e., the District's less-than-significant contributions are not triggering a new cumulative impact).

9.2.10 Environmental Impacts Summary

Table 9-4 provides a summary of the identified impacts for each subgroup of practices and chemicals included in the Program.

Table 9-4 Summary of Water Resources Impacts by Alternative

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical/ Trapping
Effects on Water Resources						
Impact WR-1: The Surveillance Alternative would not result in increased soil erosion, so the impact to surface water would be less than significant . No mitigation is required.	LS	na	na	na	na	na
Impact WR-2: The Surveillance Alternative collection devices would not contact nor interact with the environment. No impact would occur to surface water or groundwater.	N	na	na	na	na	na
Impact WR-3: The Physical Control Alternative's activities to modify water circulation, remove sediment, and maintain water control facilities to reduce habitat conditions for mosquito production would have a less-than-significant impact on soil erosion and water resources and no mitigation is required.	na	LS	na	na	na	na
Impact WR-4: Mechanical removal of vegetation from aquatic habitats would have a less-than-significant impact to surface water and no impact to groundwater resources.	na	na	LS, N	na	na	na
Impact WR-5: Application of the herbicides imazapyr and glyphosate would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	LS	na	na	na
Impact WR-6: Application of the herbicide triclopyr would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	LS	na	na	na
Impact WR-6: Application of the herbicide triclopyr would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	LS	na	na	na
Impact WR-8: Application of modified plant oils and lecithins would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	LS	na	na	na

Table 9-4 Summary of Water Resources Impacts by Alternative

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical/ Trapping
Impact WR-9: The Biological Control Alternative’s use of mosquitofish limits wastewater discharges to the sanitary sewer or upland areas. Therefore, the use of mosquitofish would have a less-than-significant impact on surface and groundwater resources and no mitigation is required.	na	na	na	LS	na	na
Impact WR-10: The Biological Control Alternative’s use of mosquitofish is limited to man-made water features that are hydrologically isolated from receiving waters. Therefore, the use of mosquitofish would have a less-than-significant impact on surface and groundwater resources and no mitigation is required.	Na	na	na	LS	na	na
Impact WR-11: Application of the biological agents Bs, Bti, and spinosad would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-12: Application of methoprene would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-13: Application of the surfactant larvicides oxyethylene, mineral oils, and aliphatic petroleum hydrocarbons would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-14: Application of the synergist PBO would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-15: Application of pyrethrins would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-16: Application of allethrins would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-17: Application of permethrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na

Table 9-4 Summary of Water Resources Impacts by Alternative

Impact Statement	Surveillance	Physical Control	Vegetation Management	Biological Control	Chemical Control	Other Nonchemical/ Trapping
Impact WR-18: Application of phenothrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-19: Application of prallethrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-20: Application of resmethrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-21: Application of tetramethrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-22: Application of deltamethrin would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-23: Application of esfenvalerate would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-24: Application of etofenprox would have a less-than-significant impact to surface and groundwater resources and no mitigation is required.	na	na	na	na	LS	na
Impact WR-25: The Nonchemical Control/Trapping Alternative collection techniques use tamper-resistant or baited traps, which limit the exposure of chemical-containing baits to the environment no impact would occur to surface water or groundwater.	na	na	na	na	na	N

LS = Less-than-significant impact

N = No impact

na = Not applicable

SM = Potentially significant but mitigable impact

SU = Significant and unavoidable impact

9.2.11 Mitigation and Monitoring

The District implements product label requirements and District BMPs to avoid or otherwise minimize and reduce potential adverse effects to surface and groundwater resources from the applied chemicals during and following pesticide applications. The District applies all chemicals in strict conformance with label requirements that have been approved by CDPR for use in California, including restrictions on application rates and methods, storage, transportation, mixing, and container disposal. As applicable, insecticides are applied in conformance with the PAP, as required by the Vector Control Permit, and herbicide formulations will be applied in conformance with the APAP, as required by the Aquatic Weed Control Permit. The District also implements hazardous materials and spill management control measures to prevent and reduce potential exposure of spilled chemicals to surface and groundwater resources.

Because all impacts to water resources are less than significant, no mitigation is required. However, the District will continue surveillance and monitoring on a routine basis. Sites are monitored post-treatment to determine if the target vector or weeds were effectively controlled with minimum effect to the environment and nontarget organisms. This information is used to help design future treatment methods in the same season or future years to respond to changes in site conditions.