

# Statewide Plant Pest Prevention and Management Program EIR (PEIR)

## ADDENDUM NO. 5

### 1. Introduction

This document is Addendum Number 5 (Addendum) to the Statewide Plant Pest Prevention and Management Program Environmental Impact Report (PEIR) prepared by the California Department of Food and Agriculture (CDFA). The PEIR is intended to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the implementation of the Statewide Plant Pest Prevention and Management Program (Statewide Program). The PEIR was prepared in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and the State CEQA Guidelines (Cal. Code Regs., tit. 14 § 15000 et seq.) (CEQA Guidelines). The PEIR was certified on December 24, 2014 by the Secretary of CDFA, Karen Ross. CDFA was the lead agency, and a Notice of Determination was filed with the Office of Planning and Research. CDFA is proposing to change the PEIR and portions of the Statewide Program pertaining to the Pierce's Disease Control Program (PDCP) to include the foliar application of the insecticide Altus® in nursery, urban, and residential settings to control glassy-winged sharpshooter (GWSS). Under CEQA, an addendum may be prepared when changes are proposed to a project that has already been approved, and those changes will not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts (CEQA Guidelines, §§ 15162, 15163, 15164).

### 2. Purpose of Addendum

The purpose of this Addendum is to add to the PEIR, as part of the PDCP, the foliar application of Altus® (active ingredient: flupyradifurone) in multiple nursery, residential, and urban settings, and aerial application of Altus® to large nursery settings. Under CEQA, the lead agency or a responsible agency shall prepare an addendum to a previously-certified EIR if some changes or additions are necessary to the prior EIR, but none of the conditions calling for preparation of a subsequent or supplemental EIR have occurred. (CEQA Guidelines, § 15164). Once an EIR has been certified, several approaches can be used to achieve CEQA compliance for specific activities. A subsequent EIR is only required when the lead agency or responsible agency determines that one of the following conditions has been met:

- (1) Substantial changes are proposed in the project, or substantial changes occur with respect to the circumstances under which the project is undertaken, which require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (CEQA Guidelines, § 15162 (a)(1)-(2));
- (2) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

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

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

This Addendum has been prepared because the proposed modifications to the PEIR do not meet the conditions for a subsequent or supplemental EIR. This Addendum explains why the proposed modifications would not result in new significant environmental effects nor result in a substantial increase in the severity of previously-identified significant effects. There is no new information demonstrating that the proposed modifications would have new significant effects or substantially increase the severity of significant effects on the environment or would change the conclusions of the previously-certified PEIR.

An addendum does not need to be circulated for public review, but rather can be attached to the final EIR (CEQA Guidelines § 15164(c)).

### **3. Statewide Program Environmental Impact Report Overview**

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

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

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

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

The Statewide Program is administered by the CDFA Plant Health and Pest Prevention Division and the PDCP. The PDCP is implemented by the county agricultural commissioners under a CDFA-approved work plan that focuses on prevention and management of Pierce's disease. Pierce's disease is a deadly disease of grapevines caused by the bacterium *Xylella fastidiosa*, which is spread by the GWSS. The PDCP's role includes early detection, identification and diagnosis; rapid response; implementation of the integrated pest management (IPM) approach; use of biological controls; establishment and enforcement of PDCP quarantine regulations; and implementation of detection, eradication, exclusion, and control projects. The State legislature has twice enacted specific statutory provisions to address Pierce's disease and GWSS. Assembly Bill 1232, enacted in October 1999, mandated creation of an advisory task force and appropriated funds for three years for Pierce's disease research (FAC, §§ 6047.29, 6047.5, 6047.7). A second bill, Senate Bill 671, enacted in May 2000, mandated certain measures to control the disease (FAC, §§ 6045–6047). In response to the legislative recognition, facts, and circumstances that indicated the existence of an emergency, CDFA undertook immediate measures to mitigate and prevent damage from Pierce's disease and GWSS, and developed the PDCP. The mission of the PDCP is to minimize the statewide impact of Pierce's disease (FAC, §§ 6045 and 6046).

The Statewide Program is ongoing. This Addendum adds the foliar application of Altus® for the control of GWSS in multiple nursery, urban, and residential settings, and aerial application of Altus® for control of GWSS in large nursery settings, to the PEIR as part of PDCP. These activities are referred to herein as the "Proposed Program." The PEIR serves as both a program- and project-level document. The PEIR is intended to be a flexible and efficient foundation to facilitate implementation of the Statewide Program activities within its scope, and, if needed, preparation of a tiered, project-level CEQA analysis for activities that were not covered in the PEIR.

As part of the Statewide PEIR, 59 application scenarios were analyzed in the PDCP activities and an additional nine scenarios were assessed in Addendum 3 to the PEIR (CDFA 2020). These application-use scenarios describe the type of chemical, concentration of chemical, application method, rate of application, area of application settings, and duration/frequency of application. The chemical use scenarios are uniquely identified by program name, chemical and identifying number. No application scenarios in the Statewide PEIR or its addenda assessed Altus®.

## **4. Proposed Modification to Statewide Program Scenario**

As identified in the PEIR, to prevent the artificial movement of GWSS from existing infested areas of California, CDFA carries out the PDCP as mandated by FAC sections 6045 through 6047 and implemented by title 3 of the California Code of Regulations, subchapter 5 (“Pierce’s Disease Control Program”). CDFA has an active control and eradication program in place for any incipient populations of GWSS within partially infested areas and areas where new infestations are found.

Pursuant to the PDCP, traps are placed in non-infested areas to detect GWSS, and a single GWSS find in a trap may trigger a delimitation survey to further define the significance of the find. If further detection and trapping indicates that GWSS may be present in numbers or life stages above a specific threshold, and control and eradication is determined to be feasible, an eradication project may be initiated. The PEIR’s GWSS Program description and analysis includes foliar and soil applications with respect to GWSS residential treatments. Currently, the PEIR describes several products that can be applied as a foliar or soil drench using a backpack sprayer or mechanically pressurized system in urban and residential areas. It also describes several products that can be applied as a foliar or soil drench using a backpack sprayer or mechanically pressurized system to control the artificial movement of GWSS in nursery or bulk citrus shipments.

CDFA is proposing to include seven new application scenarios in this Addendum comprising foliar application of the insecticide Altus® in nursery, residential, and urban settings, and aerial application of Altus® in large nursery settings. Seven application scenarios comprising the Proposed Program are described and evaluated in the Ecological (ERA) Risk Assessment and seven are described and evaluated in the Human Health Risk Assessment (HHRA) (Appendix 5A).

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

The addition of Altus® is identified as the following seven scenarios: PDCP-79, PDCP-80, PDCP-81, PDCP-82, PDCP-83, PDCP-84a, and PDCP-84b. PDCP-84a and 84b are only evaluated in the HHRA—not the ERA—because they represent application in an indoor nursery loading dock where no exposure to ecological receptors is anticipated. The HHRA and ERA conducted for the seven PDCP scenarios of the Proposed Program found that the seven scenarios would not have any new significant impacts nor substantially increase the severity of significant impacts described in the PEIR. (See Appendix 5A [Executive Summary HHRA and ERA, Problem Statement HHRA and ERA, and Conclusions].)

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

Appendix 5A includes an ERA and HHRA. The ERA and HHRA were conducted to determine if the seven PDCP scenarios with Altus® would result in any additional or more severe environmental impacts other than those addressed in the PEIR. These scenarios were analyzed as applications using a mechanically pressurized hand sprayer, backpacker sprayer, boom sprayer, and aerial application, and consist of foliar treatments in nursery urban, and residential

settings. The methods used in the ERA and HHRA largely follow those methods used in the previous risk assessments in the PEIR. Where methods differ, the new assumptions or receptors are discussed in the assessments.

For nursery/urban/residential use of Altus®, the ERA along with the PEIR were used to assist CDFA in assessing the potential to affect particular species and develop, if necessary, site-specific measures to protect these species. This ERA did not identify new significant effects beyond those identified in the PEIR, or any substantial increase in the severity of impacts described in the PEIR. No alterations or mitigation measures to the PDCP-79 through PDCP-83 scenarios that were not already indicated for other scenarios in the PEIR are recommended for the protection of biological resources. (See Appendix 5A [ERA].)

For nursery/urban/residential use of Altus®, the HHRA along with the PEIR were used to assist CDFA in assessing potential impacts to human health. The HHRA did not identify any new significant human health impacts or any substantial increase in the severity of the significant effects identified in the PEIR. No alterations to PDCP-79 through PDCP-84b scenarios that were not already indicated for other scenarios in the PEIR are recommended for the protection of human health. (See Appendix 5A [HHRA].)

PDCP staff considered the findings and conclusions of the ERA and HHRA in the context of CEQA Appendix G environmental factors that may be potentially affected by the seven application scenarios that comprise this Addendum. These findings are discussed below in further detail.

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

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

The PEIR analyzed potential effects on air quality by conducting an emissions inventory of Statewide Program activities for each air basin in the state. The PEIR noted that while air pollutants could possibly increase over time in a particular air basin to a level that would be significant, no additional feasible measures exist beyond those outlined by CDFA to further reduce criteria air pollutant emissions below the threshold (PEIR Volume 1, Main Body). CDFA currently implements all feasible measures to minimize criteria air pollutant emissions. The health risk associated with the exposure to toxic air from the activities carried out under the Statewide Program was not determined to be significant with mitigating measures, and because of the short-term nature of the activities, such exposure would not be substantial (PEIR Volume 1 Main Body, Appendix 5A [HHRA]). The Proposed Program utilizes the same methods and equipment as scenarios previously evaluated in the PEIR (Volume 3, PEIR Appendix B). The use of Altus®, rather than products used in previously analyzed scenarios, would not result in new impacts on air quality, nor substantially increase the severity of significant impacts. (See

Appendix 5A [HHRA].) Therefore, the seven new scenarios would have no new significant impacts on air quality, nor substantially increase the severity of significant impacts identified in the PEIR.

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

Proposed Program activities would utilize management practices, mitigation measures, protocols, and equipment as the scenarios previously evaluated (PEIR Volume 2, Appendix A and Volume 3, Appendix B). However, the Proposed Program would utilize a new active ingredient (flupyradifurone) and different treatment frequencies as an alternative to the scenarios previously evaluated. The Proposed Program ERA (Appendix 5A) indicated that the seven new scenarios in the Proposed Program would have no new significant impacts on biological resources, nor substantially increase the severity of significant impacts identified in the PEIR.

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

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

Global climate change was considered in the PEIR and included quantifying greenhouse gas emissions from Statewide Program activities. Over the past twenty years, statewide PDCP activities that contribute to global climate change have remained the same or decreased, depending on location and scenario. The Proposed Program's new scenarios will replace existing scenarios, and this replacement will not result in increased activities (e.g., miles travelled) that are likely to have impacts on global climate change. The analysis in the PEIR concluded that emissions would decrease due to several factors, including federal and state regulations targeted at reducing emissions, and these factors will apply equally to the Proposed Program's new scenarios. However, the PEIR also explained that if the level of activity increases in the Statewide or Proposed Program, emissions could possibly increase to a level that would be significant and unavoidable. As discussed in the PEIR, if the level of activity increases under the Statewide or Proposed Program, no feasible mitigation measures would reduce the impact to a less-than-significant level. Therefore, the seven new scenarios in the Proposed Program would have no new significant impacts on global climate change, nor substantially increase the severity of significant impacts identified in the PEIR.

Hazards and hazardous materials were considered and addressed in the PEIR, including hazards associated with use of equipment and related hazardous materials (e.g., fuels), the risk to human health associated with pesticide applications, the potential to encounter site contamination during pest management activities, the impacts of activities conducted at or near schools and airports, and the potential for pest management activities to generate wildfires. The PEIR determined that Statewide Program impacts would be reduced to less-than-significant levels by following regulatory requirements and management practices for transport, storage, and use of hazardous substances, and implementing mitigation measures (PEIR Volume 1, Main Body).

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

Hydrology was considered in the PEIR. As in the Statewide Program, the Proposed Program would not require the use of ground or surface water and would not result in the obstruction or diversion of any waterbody. It would not require the construction of structures that could be subject to flooding or other hydrologic hazards. Although there could be certain host material removal activities that include the disposal of soils adhering to the root mass of a host plant, such activities would not include removal of soil in quantities that would have any potential effects on drainage patterns of agricultural fields or affect water retention. Therefore, the seven new scenarios in the Proposed Program would have no new significant impacts on hydrology, nor substantially increase the severity of significant impacts identified in the PEIR.

Water quality was also considered in the PEIR. This water quality analysis considered the extent that Statewide Program activities could result in violations of water quality standards,

impairment of beneficial uses, or degradation of water quality conditions that could be harmful to aquatic life or human health. It also considered applicable permits and relevant management practices designed to reduce the potential for drift, runoff, or erosion. As in the Statewide Program, chemical management activities in the Proposed Program are subject to a number of regulatory requirements, and the chemicals would have fate and transport properties that would make them unlikely to be found in water at concentrations that could exceed relevant standards or impair beneficial uses. While identifying that potential significant impacts would be possible in cases where parties who are affected by any quarantine implement certain activities in response to quarantines, in these cases, protective mitigation measures would be implemented by CDFA. Though the Proposed Program activities would utilize a new active ingredient and treatment frequency, they would utilize the same management methods, protocols, and equipment as the scenarios previously evaluated (PEIR Volume 2, Appendix A and Volume 3, Appendix B). Any differences in impacts resulting from the new active ingredient and treatment frequency would not result in new significant impacts nor a substantial increase in severity of impacts associated with the current scenarios. Therefore, the seven new scenarios would have no new significant impacts on water quality, nor substantially increase the severity of significant impacts identified in the PEIR.

Land use and planning was considered in the PEIR. As with the Statewide Program, the Proposed Program would not result in the creation of any structures or barriers that could divide an established community, nor result in any permanent land use changes or regulations. All activities conducted under the Proposed Program would require the necessary authorizations from the relevant land use authority or property owners and comply with applicable laws or policies of the area. These are the same authorizations and compliance required under the previously analyzed scenarios. Therefore, the seven new scenarios would have no new significant impacts on land use and planning, nor substantially increase the severity of significant impacts identified in the PEIR.

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

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

Population and housing were considered in the PEIR. As with the Statewide Program, the Proposed Program would not require additional staff for implementation, nor would it involve construction or movement of housing. It would also not result in the construction of infrastructure or involve activities that could indirectly alter population growth. Therefore, the seven new

scenarios would have no new significant impacts on population and housing, nor substantially increase the severity of significant impacts identified in the PEIR.

Public services were considered in the PEIR. As with the Statewide Program, the Proposed Program would have no effect on the demand for public facilities because it would not increase housing or involve activities that could cause a greater demand for public services. (See Hazards section for hazardous material spill response in PEIR Volume 2, Main Body.) It would also not include any activities that could interfere with provisions of public services. Therefore, the seven new scenarios would have no new significant impacts on public services, nor substantially increase the severity of significant impacts identified in the PEIR.

Recreation was considered in the PEIR. As concluded in the PEIR, although certain Proposed Program activities may be conducted near recreational sites, the Proposed Program does not include any activities that would permanently affect the use or availability of recreation sites. Because the Proposed Program would include minimal, if any, temporary closures to recreational sites because of Proposed Program activities, effects of the availability or the use of recreational facilities would be negligible. Therefore, the seven new scenarios would have no new significant impacts on recreation, nor substantially increase the severity of significant impacts identified in the PEIR.

Transportation was considered in the PEIR. As in the Statewide Program, anticipated on-road vehicle use under the Proposed Program would be associated with personnel and equipment transport to and from work sites. Such trips would be limited to the duration and needs of the management activity at any given site. The effects on increased traffic would be intermittent and dispersed and are not expected to have a substantial effect on regional or local roadways or the overall transportation system. In addition, many of these vehicle trips are already occurring as part of Statewide Program activities. Proposed Program activities would not conflict with an applicable congestion management program as they would entail fewer than 100 trips on roadways per day, nor would they result in increased hazards due to design features, incompatible uses, or inadequate emergency access. Proposed Program activities would be substantially similar or identical to current project-induced transport. Therefore, the seven new scenarios would have no new significant impacts on transportation and traffic, nor substantially increase the severity of significant impacts identified in the PEIR.

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

The ERA and HHRA (Appendix 5A), along with the Statewide PEIR, were used to assist CDFA in assessing potential impacts to the environment and human health. Neither the ERA nor HHRA identified any new significant environmental or human health impacts or any substantial increase in the severity of significant effects identified in the PEIR due to the use of these scenarios in addition to previously analyzed treatment scenarios.

## 6. Conclusions

PDCP staff, with the assistance of the ERA and HHRA, did not identify any new significant environmental effects or a substantial increase in the severity of significant effects identified in the PEIR. In addition, PDCP staff determined that no new information of substantial importance exists, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, that would require the preparation of a subsequent EIR. (See Appendix 5A.)

## 7. References

Food & Agricultural Code, Chapter 9, Article 8 Pierce's Disease and Glassy Winged Sharpshooter.

Title 3, California Code of Regulations, Subchapter 5 Pierce's Disease Control Program.

"Statewide Plant Prevention and Management Program Environmental Impact Report", certified December 24, 2014, California Department of Food and Agriculture, Plant Health and Pest Prevention Services. (Accessed March 13, 2019): <http://www.cdfa.ca.gov/plant/peir/>.

Statewide Pest Prevention and Management Program EIR: Addendum 3. April 16, 2020, California Department of Food and Agriculture. Accessed 3/22/2021: <https://www.cdfa.ca.gov/plant/peir/docs/addenda/3FinalEcoRiskReportCDFAPDCP.pdf>

Human Health Risk Assessment, February 2021, Blankinship & Associates.

Ecological Risk Assessment, February 2021, Blankinship & Associates.